

# **PUBLIC DISCLOSURE**

April 10, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Truist Bank  
Certificate Number: 9846

214 North Tryon Street  
Charlotte, NC 28202

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

10 Tenth Street, NE  
Suite 900  
Atlanta, GA 30309-3849

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

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## INSTITUTION RATING

**INSTITUTION’S CRA RATING:** This institution is rated **Outstanding**.

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

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

**The Lending Test is rated High Satisfactory.**

- Lending levels reflect good responsiveness to assessment areas’ credit needs.
- A high percentage of loans are made in the institution’s assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of borrowers reflects good penetration among retail customers of different income levels and businesses and farms of different sizes.
- The institution uses innovative and/or flexible lending practices in order to serve the assessment area credit needs.
- The institution is a leader in making community development loans.

**The Investment Test is rated Outstanding.**

- The institution has an excellent level of qualified investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and community economic development needs.
- The institution makes significant use of innovative and/or complex investments to support community development initiatives.



**The Service Test is rated Outstanding.**

- Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas.
- To the extent changes have been made, the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies, and/or to low- and moderate-income individuals.
- Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- Truist is a leader in providing community development services.

## DESCRIPTION OF INSTITUTION

Truist Bank (Truist) is a \$546.2 billion state-chartered financial institution, headquartered in Charlotte, North Carolina. Truist is owned by one of the largest financial holding companies in the United States, Truist Financial Corporation (Corporation). Truist is the largest subsidiary of the Corporation, which also operates non-bank subsidiaries offering brokerage activities throughout its market areas. Shares of the Corporation are traded on the New York Stock Exchange under the symbol “TFC”.

The bank’s lending-related subsidiaries include Grandbridge Real Estate Capital, LLC (Grandbridge), Prime Rate Premium Finance Corporation, Inc. (Prime Rate), Service Finance Company, LLC (Service Finance), and Regional Acceptance Corporation (Regional Acceptance). Grandbridge is a commercial real estate financing company, specializing in large-scale real estate construction and permanent financing, including multi-family housing projects. Prime Rate provides insurance premium financing. Service Finance offers home improvement loans to consumers through home improvement contractors. Regional Acceptance offers indirect automobile loans through dealers.

During the evaluation period, Truist acquired Service Finance on December 6, 2021. In addition, on October 1, 2022, Regional Acceptance, which was formerly a subsidiary of Truist Financial Corporation, became a subsidiary of Truist.

The bank originates a wide variety of commercial loans including owner-occupied commercial real estate, commercial investment property, commercial and industrial, and small business commercial loans primarily through their branch network. Truist also offers a wide range of lending products to consumers. In addition, the bank originates residential mortgage loans for sale in the secondary market, as well as for retention in its loan portfolio. Moreover, Truist offers a full range of banking services, including investment, trust, and cash management products and services to both commercial and individual customers. Although the bank has a diverse business strategy, the bank primarily focuses on building banking relationships through commercial and residential lending.

Truist operates 2,094 full-service branch offices throughout its assessment areas in 13 states and 11 multi-state metropolitan statistical areas. As discussed in more detail in *Accessibility of Delivery Systems*, the bank opened 36 branches and closed 853 branches. This activity resulted in a reduction of 21 branches located in low-income census tracts and 167 branches in moderate-income census tracts. Refer to *Description of Assessment Areas* for a summary of branches in each assessment area.

As of the December 31, 2022, Consolidated Report of Condition and Income, Truist had total assets of \$546.2 billion, total deposits of \$424.8 billion, and total loans of \$327.2 billion. Total loans represent 59.9 percent of total assets. As shown in the following table, commercial real estate (nonfarm nonresidential properties) and commercial and industrial loans comprise 38.6 percent of total loans, while 1-4 family residential properties comprise 21.0 percent of total loans and represent the primary lending categories.

<b>Loan Portfolio Distribution as of 12/31/2022</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	8,877,000	2.7
Secured by Farmland	480,000	0.2
Secured by 1-4 Family Residential Properties	68,650,000	21.0
Secured by Multi-family (5 or more) Residential Properties	4,921,000	1.5
Secured by Non-farm Non-residential Properties	39,721,000	12.1
<b>Total Real Estate Loans</b>	<b>122,649,000</b>	<b>37.5</b>
Commercial and Industrial	86,632,000	26.5
Agricultural, Production, and Other Loans to Farmers	376,000	0.1
Consumer Loans	63,225,000	19.3
Obligations of State and Political Subdivisions in the U.S.	14,023,000	4.3
Lease Financing Receivables	2,285,000	0.7
Other Loans	38,033,000	11.6
<b>Total Loans</b>	<b>327,223,000</b>	<b>100.0</b>
<i>Source: Reports of Income and Condition – 12/31/2022</i>		

There are no financial, legal, or other impediments that would limit the bank's ability to meet the credit needs of its assessment areas.

The bank received an Outstanding rating at the previous FDIC Performance Evaluation dated February 18, 2020, based on Interagency Large Institution Examination Procedures.

## DESCRIPTION OF ASSESSMENT AREAS

### Economic and Demographic Data

Truist has 146 assessment areas, which are located in 13 states and 11 multi-state Metropolitan Statistical Areas (MSAs). Examiners rated bank performance in each state and multi-state MSA separately and combined the counties that are not part of an MSA to form state-wide non-MSAs for this CRA evaluation. In each MSA or Metropolitan Division (MD) where Truist operates a branch, bank management designated the entire MSA or MD as the assessment area. The following table provides a description of the assessment areas.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
<b>Florida</b>			
Cape Coral-Fort Myers, FL MSA (Cape Coral MSA)	Lee County	167	18
Crestview-Fort Walton Beach-Destin, FL MSA (Crestview MSA)	Okaloosa and Walton Counties	55	4
Deltona-Daytona Beach-Ormond Beach, FL MSA (Deltona MSA)	Flagler and Volusia Counties	135	18
Fort Lauderdale-Pompano Beach-Sunrise, FL MD (Fort Lauderdale MD)	Broward County	362	43
Gainesville, FL MSA (Gainesville MSA)	Alachua, Gilchrist, and Levy Counties	71	5
Homosassa Springs, FL MSA (Homosassa Springs MSA)	Citrus County	28	6
Jacksonville, FL MSA (Jacksonville MSA)	Baker, Clay, Duval, Nassau, and St. Johns Counties	262	29
Lakeland-Winter Haven, FL MSA (Lakeland MSA)	Polk County	154	14
Miami-Miami Beach-Kendall, FL MD (Miami MD)	Miami-Dade County	519	44
Naples-Marco Island, FL MSA (Naples MSA)	Collier County	74	10
North Port-Sarasota-Bradenton, FL MSA (North Port MSA)	Manatee and Sarasota Counties	174	26
Ocala, FL MSA (Ocala MSA)	Marion County	63	8
Orlando-Kissimmee-Sanford, FL MSA (Orlando MSA)	Lake, Orange, Osceola, and Seminole Counties	390	59
Palm Bay-Melbourne-Titusville, FL MSA (Palm Bay MSA)	Brevard County	114	14
Panama City, FL MSA (Panama City MSA)	Bay County	44	3
Pensacola-Ferry Pass-Brent, FL MSA (Pensacola MSA)	Escambia and Santa Rosa Counties	98	4
Port St. Lucie, FL MSA (Port St. Lucie MSA)	Martin and St. Lucie Counties	81	8
Punta Gorda, FL MSA (Punta Gorda MSA)	Charlotte County	39	4
Sebastian-Vero Beach, FL MSA (Sebastian MSA)	Indian River	31	4

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Sebring-Avon Park, FL MSA (Sebring MSA)	Highlands	27	3
Tallahassee, FL MSA (Tallahassee MSA)	Gadsden, Jefferson, Leon, and Wakulla Counties	86	7
Tampa-St. Petersburg- Clearwater, FL MSA (Tampa MSA)	Hernando, Hillsborough, Pasco, and Pinellas Counties	746	85
The Villages, FL MSA (The Villages MSA)	Sumter County	19	5
West Palm Beach-Boca Raton- Delray Beach, FL MD (West Palm Beach MSA)	Palm Beach County	338	38
FL Non-MSA	Desoto, Jackson, Monroe, and Okeechobee Counties	63	5
<b>Florida Subtotal</b>		<b>4,140</b>	<b>464</b>
<b>North Carolina</b>			
Asheville, NC MSA (Asheville MSA)	Buncombe, Haywood, Henderson and Madison Counties	105	8
Burlington, NC MSA (Burlington MSA)	Alamance County	36	4
Durham-Chapel Hill, NC MSA (Durham MSA)	Chatham, Durham, Granville, Orange, and Person Counties	121	19
Fayetteville, NC MSA (Fayetteville MSA)	Cumberland, Harnett, and Hoke Counties	104	14
Goldsboro, NC MSA (Goldsboro MSA)	Wayne County	26	3
Greensboro-High Point, NC MSA (Greensboro MSA)	Guilford, Randolph, and Rockingham Counties	168	24
Greenville, NC MSA (Greenville MSA)	Pitt County	32	6
Hickory-Lenoir-Morganton, NC MSA (Hickory MSA)	Alexander, Burke, Caldwell, and Catawba Counties	73	9
Jacksonville, NC MSA (Jacksonville MSA)	Onslow County	32	2
New Bern, NC MSA (New Bern MSA)	Craven, Jones, and Pamlico Counties	29	5
Raleigh-Cary, NC MSA (Raleigh MSA)	Franklin, Johnston, and Wake Counties	224	36
Rocky Mount, NC MSA (Rocky Mount MSA)	Edgecombe and Nash Counties	32	3
Wilmington, NC MSA (Wilmington MSA)	New Hanover and Pender Counties	61	7
Winston-Salem, NC MSA (Winston-Salem MSA)	Davidson, Davie, Forsyth, Stokes, and Yadkin Counties	150	20
NC Non-MSA	Alleghany, Avery, Bladen, Carteret, Cherokee, Chowan, Cleveland, Columbus, Dare, Duplin, Halifax, Jackson, Lee, Lenoir, McDowell, Martin, Montgomery, Moore, Pasquotank, Richmond, Robeson, Rutherford, Sampson, Scotland, Stanly, Surry, Tyrell, Vance, Warren, Washington, Watauga, Wilkes, and Wilson Counties.	393	65
<b>North Carolina Subtotal</b>		<b>1,586</b>	<b>225</b>
<b>Georgia</b>			
Albany, GA MSA (Albany MSA)	Dougherty, Lee, Terrell, and Worth Counties	41	4
Athens-Clark County, GA MSA (Athens MSA)	Clarke, Madison, Oconee, and Oglethorpe Counties	46	5

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Atlanta-Sandy Springs- Alpharetta, GA MSA (Atlanta MSA)	Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton Counties	951	140
Augusta-Richmond County, GA MSA (Augusta MSA)	Burke, Columbia, Lincoln, Mcduffie, and Richmond	80	6
Brunswick, GA MSA (Brunswick MSA)	Brantley, Glynn, and McIntosh Counties	24	2
Dalton, GA MSA (Dalton MSA)	Murray and Whitfield Counties	26	3
Gainesville, GA MSA (Gainesville MSA)	Hall County	36	7
Macon-Bibb County, GA MSA (Macon MSA)	Bibb, Crawford, Jones, Monroe, and Twiggs Counties	60	7
Rome, GA MSA (Rome MSA)	Floyd	20	2
Savannah, GA MSA (Savannah MSA)	Bryan, Chatham, and Effingham Counties	89	11
Valdosta, GA MSA (Valdosta MSA)	Brooks, Echols, Lanier, and Lowndes Counties	34	1
Warner Robins, GA MSA (Warner Robins MSA)	Houston and Peach Counties	29	4
GA Non-MSA	Appling, Baldwin, Bulloch, Candler, Chattooga, Coffee, Cook, Emanuel, Fannin, Franklin, Gilmer, Gordon, Greene, Lumpkin, Macon, Polk, Putnam, Screven, Taylor, Thomas, Tift, Toombs, Troup, Ware, and Wayne Counties	168	25
<b>Georgia Subtotal</b>		<b>1,604</b>	<b>217</b>
<b>Virginia</b>			
Blacksburg-Christiansburg, VA MSA (Blacksburg MSA)	Giles, Montgomery, Pulaski, and Radford City Counties	33	5
Charlottesville, VA MSA (Charlottesville MSA)	Albemarle, Charlottesville City, Fluvanna, Greene, and Nelson Counties	44	11
Harrisonburg, VA MSA (Harrisonburg MSA)	Harrisonburg City and Rockingham Counties	30	5
Lynchburg, VA MSA (Lynchburg MSA)	Amherst, Appomattox, Bedford, Campbell, and Lynchburg City Counties	60	12
Richmond, VA MSA (Richmond MSA)	Amelia, Charles City, Chesterfield, Colonial Heights City, Dinwiddie, Goochland, Hanover, Henrico, Hopewell City, King and Queen, King William, New Kent, Petersburg City, Powhatan, Prince George, Richmond City, and Sussex Counties	290	44
Roanoke, VA MSA (Roanoke MSA)	Botetourt, Craig, Franklin, Roanoke, Roanoke City, and Salem City Counties	65	14
Staunton, VA MSA (Staunton MSA)	Augusta, Staunton City, and Waynesboro City Counties	24	3
Virginia Beach-Norfolk- Newport News, VA-NC MSA (Virginia Beach MSA)	Chesapeake City, Franklin City, Gloucester, Hampton City, Isle of Wight, James City, Mathews, Newport News City, Norfolk City, Poquoson City, Portsmouth City, Southampton, Suffolk City, Virginia Beach City, Williamsburg City, and York Counties	418	40
Winchester, VA-WV MSA (Winchester MSA)	Frederick and Winchester City Counties	19	4
GA Non-MSA	Accomack, Alleghany, Bath, Bland, Buena Vista City, Carroll, Charlotte, Covington City, Danville City, Dickenson, Emporia City, Galax City, Grayson, Halifax, Henry, King George, Lexington City, Louisa, Martinsville City, Mecklenburg, Middlesex, Northampton, Nottoway, Orange, Page, Patrick, Pittsylvania, Prince Edward, Rockbridge, Russell, Shenandoah, Smyth, Tazewell, Westmoreland, Wise, and Wythe Counties	225	46
<b>Virginia Subtotal</b>		<b>1,208</b>	<b>184</b>

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
<b>Maryland</b>			
Baltimore-Columbia-Towson, MD MSA (Baltimore MSA)	Anne Arundel, Baltimore, Baltimore City, Carroll, Harford, Howard, and Queen Anne's Counties	683	61
California-Lexington Park, MD MSA (California MSA)	St. Mary's County	18	2
Frederick-Gaithersburg-Rockville, MD MD (Frederick MD)	Frederick and Montgomery Counties	276	40
Salisbury, MD-DE MSA (Salisbury MSA)	Somerset, Wicomico, and Worcester Counties	44	4
Wilmington, DE-MD-NJ MD (Wilmington MD)	Cecil County	19	1
MD Non-MSA	Caroline, Dorchester, Garrett, Kent, and Talbot Counties	43	7
<b>Maryland Subtotal</b>		<b>1,083</b>	<b>115</b>
<b>Texas</b>			
Austin-Round Rock-Georgetown, TX MSA (Austin MSA)	Bastrop, Caldwell, Hays, Travis, and Williamson Counties	350	13
College Station-Bryan, TX MSA (College Station MSA)	Brazos, Burleson, and Robertson Counties	52	5
Dallas-Plano-Irving, TX MD (Dallas MD)	Collin, Dallas, Denton, Ellis, Hunt, Kaufman, and Rockwall Counties	897	41
Fort Worth-Arlington-Grapevine, TX MD (Fort Worth MD)	Johnson, Parker, Tarrant, and Wise Counties	415	10
Houston-The Woodlands-Sugar Land, TX MSA (Houston MSA)	Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties	1,072	21
Midland, TX MSA (Midland, TX)	Martin and Midland Counties	29	2
Odessa, TX MSA (Odessa MSA)	Ector County	28	3
San Antonio-New Braunfels, TX MSA (San Antonio MSA)	Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson Counties	457	9
<b>Texas Subtotal</b>		<b>3,300</b>	<b>104</b>
<b>Pennsylvania</b>			
Allentown-Bethlehem-Easton, PA-NJ MSA (Allentown MSA)	Carbon, Lehigh, and Northampton Counties	156	20
Chambersburg-Waynesboro, PA MSA (Chambersburg MSA)	Franklin County	27	5
East Stroudsburg, PA MSA (East Stroudsburg MSA)	Monroe County	33	1
Gettysburg, PA MSA (Gettysburg MSA)	Adams County	23	2
Harrisburg-Carlisle, PA MSA (Harrisburg MSA)	Cumberland, Dauphin, and Perry Counties	124	10
Lancaster, PA MSA (Lancaster MSA)	Lancaster County	98	21
Lebanon, PA MSA (Lebanon MSA)	Lebanon County	31	2
Montgomery County-Bucks County-Chester County, PA MD (Montgomery County MD)	Bucks, Chester, and Montgomery Counties	470	41

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Philadelphia, PA MD (Philadelphia MD)	Delaware and Philadelphia Counties	528	12
Reading, PA MSA (Reading MSA)	Berks County	90	13
Scranton-Wilkes-Barre, PA MSA (Scranton MSA)	Lackawanna, Luzerne, and Wyoming Counties	170	4
State College, PA MSA (State College MSA)	Centre County	31	2
Williamsport, PA MSA (Williamsport MSA)	Lycoming County	29	2
York-Hanover, PA MSA (York MSA)	York County	90	10
PA Non-MSA	Bedford, Fulton, Northumberland, Schuylkill, and Snyder Counties	86	8
<b>Pennsylvania Subtotal</b>		<b>1,986</b>	<b>153</b>
<b>South Carolina</b>			
Charleston-North Charleston, SC MSA (Charleston MSA)	Berkeley, Charleston, and Dorchester Counties	156	13
Columbia, SC MSA (Columbia MSA)	Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda Counties	191	19
Florence, SC MSA (Florence MSA)	Darlington and Florence Counties	49	2
Greenville-Anderson, SC MSA (Greenville MSA)	Anderson, Greenville, Laurens, and Pickens Counties	195	24
Hilton Head Island-Bluffton, SC MSA (Hilton Head Island (MSA))	Beaufort and Jasper Counties	46	5
Spartanburg, SC MSA (Spartanburg MSA)	Spartanburg County	69	7
Sumter, SC MSA (Sumter MSA)	Clarendon and Sumter Counties	35	2
SC Non-MSA	Colleton, Georgetown, Hampton, McCormick, Newberry, Oconee, and Orangeburg Counties	76	9
<b>South Carolina Subtotal</b>		<b>817</b>	<b>81</b>
<b>Tennessee</b>			
Cleveland, TN MSA (Cleveland MSA)	Bradley and Polk Counties	24	3
Johnson City, TN MSA (Johnson City MSA)	Carter, Unicoi, and Washington Counties	44	2
Knoxville, TN MSA (Knoxville MSA)	Anderson, Blount, Campbell, Knox, Loudon, Morgan, Roane, and Union Counties	199	19
Morristown, TN MSA (Morristown MSA)	Grainger, Hamblen, and Jefferson Counties	26	3
Nashville-Davidson- Murfreesboro-Franklin, TN MSA (Nashville MSA)	Cannon, Cheatham, Davidson, Dickson, Macon, Maury, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties	374	35
TN Non-MSA	Franklin, Giles, Greene, Hardin, Lawrence, McMinn, Monroe, and Sevier Counties	84	9
<b>Tennessee Subtotal</b>		<b>751</b>	<b>71</b>
<b>Alabama</b>			
Anniston-Oxford, AL MSA (Anniston MSA)	Calhoun County	31	3
Auburn-Opelika, AL MSA (Auburn MSA)	Lee County	27	2
Birmingham-Hoover, AL MSA (Birmingham MSA)	Bibb, Blount, Chilton, Jefferson, Shelby, and St. Clair Counties	246	19



<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Daphne-Fairhope-Foley, AL MSA (Daphne MSA)	Baldwin County	32	5
Dothan, AL MSA (Dothan MSA)	Geneva, Henry, and Houston Counties	34	0 #
Florence-Muscle Shoals, AL MSA (Florence MSA)	Colbert and Lauderdale Counties	36	2
Gadsden, AL MSA (Gadsden MSA)	Etowah County	30	1
Huntsville, AL MSA (Huntsville MSA)	Limestone and Madison Counties	89	6
Mobile, AL MSA (Mobile MSA)	Mobile and Washington Counties	120	4
Montgomery, AL MSA (Montgomery MSA)	Autauga, Elmore, Lowndes, and Montgomery Counties	96	6
Tuscaloosa, AL MSA (Tuscaloosa MSA)	Greene, Hale, Pickens, and Tuscaloosa Counties	61	1
AL Non-MSA	Butler, Chambers, Clay, Conecuh, Covington, Crenshaw, Dale, Escambia, Jackson, Marshall, Pike, Tallapoosa, and Walker Counties	135	8
<b>Alabama Subtotal</b>		<b>937</b>	<b>57</b>
<b>New Jersey</b>			
Atlantic City-Hammonton, NJ MSA (Atlantic City MSA)	Atlantic County	70	2
Camden, NJ MD (Camden MD)	Burlington, Camden, and Gloucester Counties	304	13
New Brunswick-Lakewood, NJ MD (New Brunswick MD)	Middlesex, Monmouth, Ocean, and Somerset Counties	513	1
Trenton-Princeton, NJ MSA (Trenton MSA)	Mercer County	77	2
Vineland-Bridgeton, NJ MSA (Vineland MSA)	Cumberland County	35	5
<b>New Jersey Subtotal</b>		<b>999</b>	<b>23</b>
<b>West Virginia</b>			
Beckley, WV MSA (Beckley MSA)	Fayette and Raleigh Counties	29	2
Charleston, WV MSA (Charleston MSA)	Boone, Clay, Jackson, Kanawha, Lincoln Counties	75	9
Huntington-Ashland, WV-KY-OH MSA (Huntington MSA)	Cabell, Putnam, and Wayne Counties	50	3
Morgantown, WV MSA (Morgantown MSA)	Monongalia and Preston Counties	32	4
Parkersburg-Vienna, WV MSA (Parkersburg MSA)	Wirt and Wood Counties	28	3
Wheeling, WV-OH MSA (Wheeling MSA)	Marshall and Ohio Counties	27	3
WV Non-MSA	Greenbrier, Harrison, Logan, Marion, Mercer, Mingo, Nicholas, and Taylor Counties	90	14
<b>West Virginia Subtotal</b>		<b>331</b>	<b>38</b>
<b>Kentucky</b>			
Bowling Green, KY MSA (Bowling Green MSA)	Allen, Butler, Edmonson, and Warren Counties	39	4
Clarksville, TN-KY MSA (Clarksville MSA)	Christian and Trigg Counties	24	1
Lexington-Fayette, KY MSA (Lexington MSA)	Bourbon, Clark, Fayette, Jessamine, Scott, and Woodford Counties	129	6

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Owensboro, KY MSA (Owensboro MSA)	Daviess, Hancock, and McLean Counties	29	4
KY Non-MSA	Barren, Calloway, Floyd, Harlan, Johnson, Knox, Laurel, Logan, Lyon, McCracken, Pike, Pulaski, Russell, Washington, and Wayne Counties	139	14
<b>Kentucky Subtotal</b>		<b>360</b>	<b>29</b>
<b>Washington-Arlington-Alexandria, DC-MD-VA-WV Multi-state MSA (Washington MSA)</b>	District of Columbia, Calvert, Charles, Prince George's, Alexandria City, Arlington, Clarke, Culpeper, Fairfax, Fairfax City, Falls Church City, Fauquier, Fredericksburg City, Loudoun, Madison, Manassas City, Manassas Park City, Prince William, Rappahannock, Spotsylvania, Stafford, Warren, and Jefferson Counties	<b>1,085</b>	<b>152</b>
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
<b>Charlotte-Concord-Gastonia, NC-SC Multi-state MSA (Charlotte MSA)</b>	Anson, Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Union, Chester, Lancaster, and York Counties	<b>545</b>	<b>67</b>
<b>Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA (Myrtle Beach MSA)</b>	Brunswick and Horry Counties	<b>105</b>	<b>19</b>
<b>Louisville-Jefferson County, KY-IN Multi-state MSA (Louisville MSA)</b>	Clark, Floyd, Harrison, Washington, Bullitt, Henry, Jefferson, Oldham, Shelby, and Spencer Counties	<b>299</b>	<b>20</b>
<b>Chattanooga, TN-GA Multi-state MSA (Chattanooga MSA)</b>	Catoosa, Dade, Hamilton, Marion, Sequatchie, and Walker Counties	<b>119</b>	<b>16</b>
<b>Cincinnati, OH-KY-IN Multi-state MSA (Cincinnati MSA)</b>	Boone, Bracken, Campbell, Gallatin, Grant, Kenton, Pendleton, Brown, Butler, Clermont, Hamilton, and Warren Counties	<b>484</b>	<b>15</b>
<b>Memphis, TN-MS-AR Multi-state MSA (Memphis MSA)</b>	Crittenden, Desoto, Fayette, Marshall, Shelby, Tate, Tipton, and Tunica Counties	<b>312</b>	<b>18</b>
<b>Hagerstown-Martinsburg, MD-WV Multi-state MSA (Hagerstown MSA)</b>	Washington, Berkeley, and Morgan Counties	<b>50</b>	<b>11</b>
<b>Columbus, GA-AL Multi-state MSA (Columbus MSA)</b>	Russell, Chattahoochee, Harris, Marion, Muscogee, Stewart, and Talbot Counties	<b>83</b>	<b>5</b>
<b>Kingsport-Bristol, TN-VA Multi-state MSA (Kingsport MSA)</b>	Hawkins, Sullivan, Bristol City, Scott, and Washington Counties	<b>75</b>	<b>7</b>
<b>Cumberland MD-WV Multi-state MSA (Cumberland MSA)</b>	Alleghany and Mineral Counties	<b>30</b>	<b>3</b>
<b>Total</b>			<b>2,094</b>
<i>Source: Bank records.  Assessment areas are as of 12/31/2022.  Branch data is as of 12/31/2022.  Census tracts are as of the 2015 American Community Survey.  # - Bank only operates a deposit-taking ATM in the Dothan MSA assessment area.</i>			

Refer to the individual rated-area and assessment area sections for specific economic and demographic information.

## SCOPE OF EVALUATION

### General Information

In evaluating Truist’s Community Reinvestment Act (CRA) performance, examiners used the Large Institution CRA Examination Procedures, which consist of three tests: Lending, Investment, and Service. Examiners used the procedures to evaluate the bank’s CRA performance in its designated assessment areas. The evaluation period was from January 1, 2020, to December 31, 2022. Subsidiary lending activity of Grandbridge has been combined with the bank’s own data for presentation purposes.

The lending test considers an institution’s performance with respect to its lending activity and assessment area concentration; geographic distribution and borrower profile characteristics; innovative or flexible lending practices; and community development lending. The investment test considers the nature of an institution’s qualified investments, grants, and donations. In particular, the investment test considers the level, responsiveness, innovativeness, and complexity of these activities. Lastly, the service test analyzes an institution’s retail services in relation to accessibility of delivery systems; branch locations, including openings and closures; and reasonableness of business hours and services. The service test also evaluates an institution’s level of community development services.

While reviewing lending in all assessment areas, examiners evaluated the bank’s lending data, deposit activity, and the number of branches to determine which rated areas would receive the most weight in the overall analysis, conclusions, and ratings. As shown in the following table, Florida, North Carolina, Georgia, the Washington-Arlington-Alexandria, DC-VA-MD-WV Multi-state MSA, Virginia, and Maryland have the most lending, deposits, and branching networks. Consequently, examiners gave the most weight to those rated areas. Additionally, within each state, examiners reviewed the level of lending, deposits, and branching activity to determine which assessment areas to review using full-scope examination procedures and the assessment areas to review using limited-scope examination procedures. The full-scope assessment areas were selected for each state or multi-state MSA as such accounted for significant operations within the rated-area.

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
Tampa MSA *	1,433,243	2.7	16.3	11,081	3.7	17.7	16,736,281	3.8	19.3	85	4.1	18.3
Orlando MSA *	1,300,490	2.4	14.8	8,852	2.9	14.1	16,590,232	3.8	19.2	59	2.8	12.7
Miami MD *	823,262	1.5	9.4	5,834	1.9	9.3	8,241,097	1.9	9.5	44	2.1	9.5
Fort Lauderdale MD *	778,338	1.4	8.9	5,530	1.8	8.8	10,479,280	2.4	12.1	43	2.1	9.3
West Palm Beach MD *	584,246	1.1	6.7	4,581	1.5	7.3	4,980,798	1.1	5.7	38	1.8	8.2
Jacksonville MSA	818,478	1.5	9.3	3,186	1.1	5.1	3,235,666	0.7	3.7	29	1.4	6.3
North Port MSA	577,929	1.1	6.6	3,665	1.2	5.8	4,464,834	1.0	5.2	26	1.2	5.6
Deltona MSA	257,994	0.5	2.9	2,926	1.0	4.7	3,015,887	0.7	3.5	18	0.9	3.9

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
Cape Coral MSA	231,519	0.4	2.6	2,439	0.8	3.9	3,295,485	0.8	3.8	18	0.9	3.9
Palm Bay MSA	289,587	0.5	3.3	2,396	0.8	3.8	2,700,817	0.6	3.1	14	0.7	3.0
Lakeland MSA	156,086	0.3	1.8	1,785	0.6	2.9	2,245,210	0.5	2.6	14	0.7	3.0
Naples MSA	197,688	0.4	2.3	1,090	0.4	1.7	1,080,375	0.2	1.2	10	0.5	2.2
Port St Lucie MSA	148,709	0.3	1.7	1,483	0.5	2.4	1,100,027	0.3	1.3	8	0.4	1.7
Ocala MSA	108,060	0.2	1.2	1,213	0.4	1.9	2,051,080	0.5	2.4	8	0.4	1.7
Tallahassee MSA	118,303	0.2	1.3	854	0.3	1.4	1,233,993	0.3	1.4	7	0.3	1.5
FL Non-MSA	187,695	0.2	2.1	575	0.2	0.9	672,618	0.1	0.8	5	0.2	1.1
Pensacola MSA	148,070	0.3	1.7	823	0.3	1.3	774,036	0.2	0.9	4	0.2	0.9
Crestview MSA	211,620	0.4	2.4	686	0.2	1.1	277,147	0.1	0.3	4	0.2	0.9
Homosassa Springs MSA	82,737	0.2	0.9	840	0.3	1.3	834,869	0.2	1.0	6	0.3	1.3
Gainesville MSA	83,554	0.2	1.0	577	0.2	0.9	429,511	0.1	0.5	5	0.2	1.1
Punta Gorda MSA	81,336	0.2	0.9	867	0.3	1.4	919,765	0.2	1.1	4	0.2	0.9
The Villages MSA	48,478	0.1	0.6	410	0.1	0.7	440,257	0.1	0.5	5	0.2	1.1
Sebastian MSA	47,645	0.1	0.5	396	0.1	0.6	318,903	0.1	0.4	4	0.2	0.9
Panama City MSA	39,102	0.1	0.4	377	0.1	0.6	283,851	0.1	0.3	3	0.1	0.6
Sebring MSA	14,286	0.0	0.2	248	0.1	0.4	227,980	0.1	0.3	3	0.1	0.6
<b>Florida</b>	<b>8,768,452</b>	<b>16.3</b>	<b>100.0</b>	<b>62,714</b>	<b>20.8</b>	<b>100.0</b>	<b>86,629,999</b>	<b>19.9</b>	<b>100.0</b>	<b>464</b>	<b>22.2</b>	<b>100.0</b>
Raleigh MSA *	1,735,313	3.2	28.3	8,725	2.9	22.0	7,837,783	1.8	18.8	36	1.7	16.0
NC Non-MSA *	948,330	1.9	15.5	7,600	2.5	19.1	9,054,720	2.0	21.8	65	3.1	28.9
Durham MSA *	807,136	1.5	13.2	4,383	1.4	11.0	4,465,689	1.0	10.7	19	0.9	8.4
Greensboro MSA *	561,326	1.0	9.2	3,880	1.3	9.8	4,501,617	1.0	10.8	24	1.2	10.7
Winston-Salem MSA	488,476	0.9	8.0	3,542	1.2	8.9	4,247,513	1.0	10.2	20	1.0	8.9
Asheville MSA	337,442	0.6	5.5	1,855	0.6	4.7	1,689,898	0.4	4.1	8	0.4	3.6
Wilmington MSA	355,843	0.7	5.8	1,965	0.6	5.0	2,142,753	0.5	5.1	7	0.3	3.1
Hickory MSA	209,465	0.4	3.4	1,862	0.6	4.7	1,751,133	0.4	4.2	9	0.4	4.0
Fayetteville MSA	174,939	0.3	2.9	2,028	0.7	5.1	2,124,299	0.5	5.1	14	0.7	6.2
Greenville MSA	157,571	0.3	2.6	1,013	0.3	2.6	756,303	0.2	1.8	6	0.3	2.7
New Bern MSA	101,410	0.2	1.7	797	0.3	2.0	736,514	0.2	1.8	5	0.2	2.2
Burlington MSA	69,665	0.1	1.1	616	0.2	1.6	681,115	0.2	1.6	4	0.2	1.8
Goldsboro MSA	63,178	0.1	1.0	568	0.2	1.4	906,755	0.2	2.2	3	0.1	1.3
Rocky Mount MSA	67,170	0.1	1.1	517	0.2	1.3	437,293	0.1	1.1	3	0.1	1.3
Jacksonville MSA	44,998	0.1	0.7	330	0.1	0.8	291,304	0.1	0.7	2	0.1	0.9
<b>North Carolina</b>	<b>6,122,262</b>	<b>11.4</b>	<b>100.0</b>	<b>39,681</b>	<b>13.1</b>	<b>100.0</b>	<b>41,624,689</b>	<b>9.6</b>	<b>100.0</b>	<b>225</b>	<b>10.7</b>	<b>100.0</b>

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
Atlanta MSA *	4,487,696	8.3	80.2	25,969	8.6	74.5	56,886,799	13.1	82.8	140	6.8	64.5
GA Non-MSA *	211,620	0.5	3.8	1,948	0.7	5.6	1,935,502	0.4	2.8	25	1.2	11.5
Savannah MSA	224,998	0.4	4.0	1,479	0.5	4.2	2,391,698	0.5	3.5	11	0.5	5.1
Athens MSA	139,762	0.3	2.5	821	0.3	2.4	813,903	0.2	1.2	5	0.2	2.3
Augusta MSA	152,035	0.3	2.7	955	0.3	2.7	855,710	0.2	1.2	6	0.3	2.8
Gainesville MSA	119,981	0.2	2.1	1,034	0.3	3.0	1,408,546	0.3	2.0	7	0.3	3.2
Macon MSA	49,378	0.1	0.9	645	0.2	1.8	1,517,105	0.3	2.2	7	0.3	3.2
Dalton MSA	50,715	0.1	0.9	451	0.1	1.3	1,005,080	0.2	1.5	3	0.1	1.4
Warner Robins MSA	56,593	0.1	1.0	520	0.2	1.5	535,099	0.1	0.8	4	0.2	1.8
Brunswick MSA	51,755	0.1	0.9	309	0.1	0.9	723,239	0.2	1.0	2	0.1	0.9
Rome MSA	23,113	0.0	0.4	268	0.1	0.8	243,730	0.1	0.4	2	0.1	0.9
Albany MSA	19,369	0.0	0.3	355	0.1	1.0	321,312	0.1	0.5	4	0.2	1.8
Valdosta MSA	11,751	0.0	0.2	113	0.0	0.3	54,973	0.1	0.1	1	0.1	0.5
<b>Georgia</b>	<b>5,598,765</b>	<b>10.4</b>	<b>100.0</b>	<b>34,867</b>	<b>11.5</b>	<b>100.0</b>	<b>68,692,696</b>	<b>15.8</b>	<b>100.0</b>	<b>217</b>	<b>10.4</b>	<b>100.0</b>
Richmond MSA *	1,186,882	2.2	33.8	7,574	2.5	31.1	11,228,494	2.6	34.8	44	2.1	23.9
Virginia Beach MSA *	1,207,701	2.2	34.4	6,883	2.3	28.2	8,664,466	2.0	26.8	40	2.0	21.7
VA Non-MSA *	309,818	0.5	8.8	3,231	1.1	13.2	2,946,885	0.7	9.1	46	2.2	25.0
Roanoke MSA	161,699	0.3	4.6	1,635	0.5	6.7	3,116,259	0.7	9.6	14	0.7	7.6
Charlottesville MSA	219,124	0.4	6.2	1,529	0.5	6.3	1,601,282	0.4	5.0	11	0.5	6.0
Lynchburg MSA	141,757	0.3	4.0	1,339	0.5	5.5	1,500,976	0.3	4.6	12	0.6	6.5
Harrisonburg MSA	87,110	0.2	2.5	683	0.2	2.8	969,882	0.2	3.0	5	0.2	2.7
Winchester MSA	86,393	0.2	2.5	637	0.2	2.6	1,390,636	0.3	4.3	4	0.2	2.2
Blacksburg MSA	50,228	0.1	1.4	392	0.1	1.6	538,849	0.1	1.7	5	0.2	2.7
Staunton MSA	58,556	0.1	1.7	482	0.2	2.0	335,207	0.1	1.0	3	0.1	1.6
<b>Virginia</b>	<b>3,509,266</b>	<b>6.5</b>	<b>100.0</b>	<b>24,385</b>	<b>8.1</b>	<b>100.0</b>	<b>32,292,936</b>	<b>7.4</b>	<b>100.0</b>	<b>184</b>	<b>8.8</b>	<b>100.0</b>
Baltimore MSA *	2,713,335	5.0	50.0	11,078	3.7	53.7	11,695,877	2.7	61.9	61	2.9	53.0
Frederick MD *	2,426,568	4.5	44.7	8,048	2.7	39.0	6,137,277	1.4	32.5	40	1.9	34.8
MD Non-MSA	113,691	0.2	2.1	557	0.2	2.7	323,128	0.1	1.7	7	0.3	6.1
Salisbury MSA	86,961	0.2	1.6	482	0.1	2.4	506,266	0.1	2.7	4	0.2	3.5
California MSA	66,383	0.1	1.2	311	0.1	1.5	201,288	0.0	1.1	2	0.1	1.7
Wilmington MD	23,291	0.1	0.4	141	0.0	0.7	32,054	0.0	0.2	1	0.1	0.9
<b>Maryland</b>	<b>5,430,229</b>	<b>10.1</b>	<b>100.0</b>	<b>20,617</b>	<b>6.8</b>	<b>100.0</b>	<b>18,895,890</b>	<b>4.3</b>	<b>100.0</b>	<b>115</b>	<b>5.5</b>	<b>100.0</b>
Dallas MD *	1,586,693	2.9	35.4	5,781	1.9	34.8	2,629,633	0.6	31.6	41	2.0	39.4
Houston MSA *	1,071,691	2.0	23.9	4,081	1.4	24.6	2,859,061	0.7	34.4	21	1.0	20.2
Austin MSA *	828,517	1.5	18.5	2,444	0.8	14.7	661,175	0.2	7.9	13	0.7	12.5
Fort Worth MD	597,653	1.1	13.4	2,278	0.8	13.7	540,276	0.1	6.5	10	0.5	9.6

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
San Antonio MSA	268,780	0.6	6.0	1,298	0.4	7.8	289,079	0.1	3.5	9	0.4	8.7
College Station MSA	69,125	0.1	1.5	432	0.1	2.6	1,074,291	0.2	12.9	5	0.2	4.8
Midland MSA	47,706	0.1	1.1	199	0.1	1.2	119,976	0.0	1.4	2	0.1	1.9
Odessa MSA	6,210	0.0	0.1	96	0.0	0.6	147,191	0.0	1.8	3	0.1	2.9
<b>Texas</b>	<b>4,476,376</b>	<b>8.3</b>	<b>100.0</b>	<b>16,609</b>	<b>5.5</b>	<b>100.0</b>	<b>8,320,682</b>	<b>1.9</b>	<b>100.0</b>	<b>104</b>	<b>5.0</b>	<b>100.0</b>
Montgomery County MD *	1,007,724	1.9	44.5	4,201	1.4	32.0	4,276,017	1.0	27.1	41	1.9	26.8
Lancaster MSA *	211,864	0.4	9.4	1,558	0.5	11.9	2,806,270	0.6	17.8	21	1.0	13.7
Allentown MSA *	214,637	0.4	9.5	1,593	0.5	12.1	2,472,963	0.6	15.7	20	0.9	13.1
Philadelphia MD *	270,945	0.5	12.0	1,196	0.4	9.1	844,241	0.2	5.4	12	0.6	7.8
Reading MSA	106,396	0.2	4.7	890	0.3	6.8	1,727,529	0.4	11.0	13	0.6	8.5
York MSA	143,913	0.3	6.4	966	0.3	7.4	1,222,410	0.3	7.8	10	0.5	6.5
Harrisburg MSA	92,028	0.2	4.1	690	0.2	5.3	343,747	0.1	2.2	10	0.5	6.5
PA Non-MSA	43,469	0.1	1.9	529	0.2	4.1	571,318	0.1	3.6	8	0.4	5.2
Chambersburg MSA	33,014	0.1	1.5	322	0.1	2.5	395,708	0.1	2.5	5	0.2	3.3
Scranton MSA	27,365	0.0	1.2	310	0.1	2.4	361,187	0.1	2.3	4	0.2	2.6
Gettysburg MSA	39,238	0.1	1.7	268	0.1	2.0	82,648	0.0	0.5	2	0.1	1.3
Lebanon MSA	20,887	0.0	0.9	176	0.1	1.3	50,170	0.0	0.3	2	0.1	1.3
Williamsport MSA	15,172	0.0	0.7	161	0.1	1.2	200,941	0.0	1.3	2	0.1	1.3
State College MSA	20,709	0.0	0.9	123	0.0	0.9	350,238	0.1	2.2	2	0.1	1.3
East Stroudsburg MSA	18,023	0.0	0.8	135	0.0	1.0	58,454	0.0	0.4	1	0.1	0.7
<b>Pennsylvania</b>	<b>2,265,384</b>	<b>4.2</b>	<b>100.0</b>	<b>13,118</b>	<b>4.3</b>	<b>100.0</b>	<b>15,763,841</b>	<b>3.6</b>	<b>100.0</b>	<b>153</b>	<b>7.3</b>	<b>100.0</b>
Greenville MSA *	537,502	1.0	28.0	3,625	1.2	31.6	4,479,083	1.0	33.1	24	1.2	29.6
Charleston MSA *	588,181	1.1	30.7	2,569	0.8	22.4	2,172,994	0.5	16.1	13	0.6	16.0
Columbia MSA *	296,665	0.6	15.5	2,139	0.7	18.7	3,361,116	0.8	24.8	19	0.9	23.5
Spartanburg MSA	166,229	0.3	8.7	1,119	0.4	9.8	1,648,028	0.4	12.2	7	0.3	8.6
SC Non-MSA	126,990	0.2	6.6	760	0.2	6.6	609,372	0.1	4.5	9	0.5	11.1
Hilton Head MSA	145,494	0.3	7.6	766	0.3	6.7	755,530	0.2	5.6	5	0.2	6.2
Florence MSA	36,998	0.1	1.9	279	0.1	2.4	406,868	0.1	3.0	2	0.1	2.5
Sumter MSA	19,565	0.0	1.0	210	0.1	1.8	104,778	0.0	0.8	2	0.1	2.5
<b>South Carolina</b>	<b>1,917,624</b>	<b>3.6</b>	<b>100.0</b>	<b>11,467</b>	<b>3.8</b>	<b>100.0</b>	<b>13,537,769</b>	<b>3.1</b>	<b>100.0</b>	<b>81</b>	<b>3.9</b>	<b>100.0</b>
Nashville MSA *	1,036,427	1.9	66.6	5,440	1.8	57.1	8,596,889	1.9	59.1	35	1.7	49.3
Knoxville MSA *	364,391	0.7	23.4	2,465	0.8	25.9	4,006,642	0.9	27.5	19	0.9	26.8
TN Non-MSA	70,765	0.1	4.5	653	0.2	6.9	684,299	0.1	4.7	9	0.5	12.7

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
Johnson City MSA	34,407	0.1	2.2	382	0.1	4.0	678,812	0.2	4.7	2	0.1	2.8
Cleveland MSA	28,347	0.1	1.8	279	0.1	2.9	316,481	0.1	2.2	3	0.1	4.2
Morristown MSA	22,539	0.0	1.4	301	0.1	3.2	274,257	0.0	1.9	3	0.1	4.2
<b>Tennessee</b>	<b>1,556,876</b>	<b>2.9</b>	<b>100.0</b>	<b>9,520</b>	<b>3.1</b>	<b>100.0</b>	<b>14,557,380</b>	<b>3.2</b>	<b>100.0</b>	<b>71</b>	<b>3.4</b>	<b>100.0</b>
Birmingham MSA *	268,367	0.5	32.9	1,612	0.6	31.4	1,664,379	0.4	36.0	19	0.9	33.3
Huntsville MSA *	143,224	0.3	17.6	670	0.2	13.0	419,923	0.1	9.1	6	0.3	10.5
Daphne MSA *	86,863	0.2	10.7	530	0.2	10.3	170,331	0.0	3.7	5	0.2	8.8
Montgomery MSA *	40,428	0.1	5.0	395	0.1	7.7	319,832	0.1	6.9	6	0.3	10.5
AL Non-MSA	38,451	0.1	4.7	418	0.1	8.1	985,698	0.2	21.3	8	0.3	14.0
Mobile MSA	52,701	0.1	6.5	367	0.1	7.2	272,101	0.1	5.9	4	0.2	7.0
Auburn MSA	58,741	0.1	7.2	284	0.1	5.5	295,177	0.1	6.4	2	0.1	3.5
Tuscaloosa MSA	56,117	0.1	6.9	314	0.1	6.1	78,232	0.0	1.7	1	0.1	1.8
Florence MSA	29,308	0.0	3.6	191	0.1	3.7	199,531	0.0	4.3	2	0.1	3.5
Anniston MSA	17,147	0.0	2.1	171	0.1	3.3	185,867	0.0	4.0	3	0.1	5.3
Dothan MSA	11,176	0.0	1.4	103	0.0	2.0	0	0.0	0.0	0	0.0	0.0
Gadsden MSA	12,719	0.0	1.6	89	0.0	1.7	31,182	0.0	0.7	1	0.1	1.8
<b>Alabama</b>	<b>815,242</b>	<b>1.5</b>	<b>100.0</b>	<b>5,144</b>	<b>1.7</b>	<b>100.0</b>	<b>4,622,253</b>	<b>1.0</b>	<b>100.0</b>	<b>57</b>	<b>2.7</b>	<b>100.0</b>
New Brunswick MD *	879,727	1.6	73.9	2,559	0.8	55.0	46,256	0.0	1.6	1	0.1	4.3
Camden MD *	182,923	0.3	15.4	1,190	0.4	25.5	554,591	0.1	19.1	13	0.6	56.5
Vineland MSA	24,728	0.1	2.1	278	0.1	6.0	2,132,634	0.5	73.3	5	0.2	21.7
Atlantic City MSA	51,138	0.1	4.3	350	0.1	7.5	111,885	0.0	3.8	2	0.1	8.7
Trenton MSA	52,587	0.1	4.4	279	0.1	6.0	64,336	0.0	2.2	2	0.1	8.7
<b>New Jersey</b>	<b>1,191,104</b>	<b>2.2</b>	<b>100.0</b>	<b>4,656</b>	<b>1.5</b>	<b>100.0</b>	<b>2,909,972</b>	<b>0.6</b>	<b>100.0</b>	<b>23</b>	<b>1.1</b>	<b>100.0</b>
WV Non-MSA *	88,068	0.2	23.9	920	0.3	28.3	1,624,294	0.4	27.5	14	0.7	36.8
Charleston MSA *	90,459	0.2	24.5	779	0.3	24.0	2,395,922	0.6	40.6	9	0.5	23.7
Morgantown MSA *	53,688	0.1	14.6	417	0.1	12.9	398,233	0.1	6.8	4	0.2	10.5
Huntington MSA	48,303	0.1	13.1	389	0.1	12.0	622,344	0.1	10.6	3	0.1	7.9
Beckley MSA	43,458	0.1	11.8	326	0.1	10.0	198,852	0.0	3.4	2	0.1	5.3
Wheeling MSA	31,987	0.1	8.7	247	0.1	7.6	415,078	0.1	7.0	3	0.1	7.9
Parkersburg MSA	12,609	0.0	3.4	169	0.1	5.2	242,234	0.1	4.1	3	0.1	7.9
<b>West Virginia</b>	<b>368,572</b>	<b>0.8</b>	<b>100.0</b>	<b>3,247</b>	<b>1.1</b>	<b>100.0</b>	<b>5,896,957</b>	<b>1.4</b>	<b>100.0</b>	<b>38</b>	<b>1.8</b>	<b>100.0</b>
KY Non-MSA *	90,153	0.2	24.9	908	0.3	31.0	878,314	0.2	30.0	14	0.6	48.3
Lexington MSA *	118,314	0.2	32.7	711	0.2	24.3	612,993	0.1	20.9	6	0.3	20.7
Bowling Green MSA	104,956	0.2	29.0	820	0.3	28.0	740,806	0.2	25.3	4	0.2	13.8

**Assessment Area Breakdown of Loans, Deposits, and Branches**

Assessment Area	Loans						Deposits			Branches		
		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area		Bank	Rated Area
	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%
Owensboro MSA	38,300	0.1	10.6	372	0.1	12.7	416,187	0.1	14.2	4	0.2	13.8
Clarksville MSA	9,958	0.0	2.8	117	0.0	4.0	281,103	0.1	9.6	1	0.1	3.4
<b>Kentucky</b>	<b>361,681</b>	<b>0.7</b>	<b>100.0</b>	<b>2,928</b>	<b>1.0</b>	<b>100.0</b>	<b>2,929,403</b>	<b>0.7</b>	<b>100.0</b>	<b>29</b>	<b>1.4</b>	<b>100.0</b>
Washington MSA	7,238,497	13.4		26,961	8.9		35,947,757	8.3		152	7.3	
Charlotte MSA	2,269,831	4.2		12,867	4.3		67,798,038	15.6		67	3.2	
Myrtle Beach MSA	536,642	1.0		3,316	1.1		2,299,211	0.5		19	0.9	
Louisville MSA	254,467	0.5		1,926	0.6		3,172,808	0.7		20	1.0	
Chattanooga MSA	207,732	0.4		1,962	0.6		2,499,268	0.6		16	0.8	
Cincinnati MSA	318,262	0.6		1,793	0.6		1,910,243	0.4		15	0.7	
Memphis MSA	384,371	0.7		1,875	0.6		1,881,067	0.4		18	0.8	
Hagerstown MSA	127,774	0.2		1,068	0.4		1,244,533	0.3		11	0.5	
Columbus MSA	60,981	0.1		673	0.2		1,314,450	0.3		5	0.2	
Kingsport MSA	43,700	0.0		515	0.2		433,096	0.2		7	0.3	
Cumberland MSA	11,322	0.0		144	0.0		268,060	0.2		3	0.1	
<b>Total</b>	<b>53,835,412</b>	<b>100.0</b>		<b>302,053</b>	<b>100.0</b>		<b>435,442,998</b>	<b>100.0</b>		<b>2,094</b>	<b>100.0</b>	

Source: 2021 HMDA and CRA Data.

Branch data is as of 12/31/2022.

FDIC Summary of Deposits as of 6/30/2022.

\*Assessment Areas Reviewed using Full-Scope Examination Procedures.

Due to rounding columns may not total.

**Activities Reviewed**

This evaluation includes a review of loans reported pursuant to the Home Mortgage Disclosure Act (HMDA) and the CRA for 2020, 2021, and 2022. The tables in Appendix D present 2021 lending data as this is the most recent year for which aggregate data is available for comparison purposes. The written analysis of lending includes 2021 lending; however, examiners also reviewed lending performance for 2020 and 2022 and discuss any significant performance variances under the *Geographic Distribution* and *Borrower Profile* performance criteria. In addition, lending analysis primarily considers the number of loans rather than the dollar amount for CRA evaluations as the number of loans is a better indicator of the number of families, businesses, and farms impacted. However, the evaluation also consider the dollar amount of lending. Lastly, the *Geographic Distribution* and *Borrower Profile* discussion focuses only on loans originated and purchased within the assessment areas and rated-areas.

Federal banking agencies rely on U.S. Census data that is updated every five years for purposes of CRA evaluations, and this evaluation covers two census tabulations. Therefore, the bank’s 2020 and 2021 loan data is compared to the 2015 American Community Survey (ACS) Census data, and the 2022 loan data is compared to the 2020 U.S. Census data. In addition, the bank’s performance



is compared to aggregate HMDA and CRA data from 2020 and 2021 and 2020, 2021, and 2022 business demographic data from D&B.

When weighing the loan products’ effect on the conclusions, examiners evaluated home mortgage, small business, and small farm loans on the volume of lending over the review period. As shown in the following table, Truist’s reportable loans by number reflect a fairly similar emphasis on home mortgage and small business loans. However, by dollar volume, the bank originated a significantly higher dollar volume of home mortgage loans. Since the bank primarily focuses on commercial and home mortgage lending, examiners placed similar weight on the distribution of small business and home mortgage loans. However, in some rated areas, the bank’s lending distributions were more heavily weighted on one product; and, therefore examiners placed more weight on a particular product and the weighting is discussed under the rated area *Scope of Evaluation*. The bank originated a nominal number and dollar volume of small farm loans; thus, small farm lending performance is only included in the assessment areas with a sufficient volume of loans for analysis, namely, the Montgomery County MD, Lancaster MSA, and NC Non-MSA assessment areas. Due to the nominal amount of small farm lending, less emphasis was placed on small farm lending performance.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Universe</b>		<b>Reviewed</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Home Mortgage	580,683	187,236,661	580,683	187,236,661
Small Business	497,766	26,780,196	497,766	26,780,196
Small Farm	3,571	447,993	3,571	447,993

*Source: 2020, 2021, and 2022 HMDA and CRA Data.*

Additionally, a review of the delivery systems for retail banking services and the impact of any branch openings or closures was completed. Retail banking services were reviewed to ensure that the needs of the assessment areas are being met, especially for low- and moderate-income borrowers, small businesses, and small farms. The branch office distribution period is from January 1, 2020, through December 31, 2022. Furthermore, the evaluation period for community development loans, qualified investments, and community development services is January 1, 2020, through December 31, 2022. Any qualified investment originated prior to the last evaluation and still outstanding is also considered.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

The overall Lending Test rating for this institution is High Satisfactory. Lending levels reflect good responsiveness to the assessment areas’ credit needs, and a high percentage of the loans are made in the institution’s assessment areas. The geographic distribution of loans reflects good penetration throughout the assessment areas, and the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses and farms of different size. The institution uses innovative and flexible lending practices in order to serve the assessment area credit needs and is a leader in making community development loans. Overall, the conclusions for the institution are

consistent with the rated-area ratings. All rated-areas were considered as High Satisfactory with the exception of Maryland, Alabama, and New Jersey where performance was considered Outstanding.

### Lending Activity

Lending levels reflect good responsiveness to the assessment areas' credit needs. During the evaluation period, Truist had an average net loan-to-deposit ratio of 73.3 percent. The net loan-to-deposit ratio ranged from a low of 65.3 percent March 31, 2022, to a high of 86.8 percent on March 31, 2020. Home mortgage lending volumes decreased substantially in 2021 and 2022, which is primarily attributable to the rise in interest rates and economic conditions. Small business lending volumes also decreased in 2021 and 2022. This is primarily attributed to the discontinuation of the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP).

### Assessment Area Concentration

A high percentage of loans were made in the assessment areas. The following table presents the lending inside and outside of the assessment areas.

<b>Lending Inside and Outside of the Assessment Areas</b>											
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans</b>				<b>Total \$(000s)</b>	
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>		
<b>Home Mortgage</b>											
2020	167,433	71.6	66,423	28.4	233,856	46,240,813	67.9	21,875,575	32.1	68,116,388	
2021	152,047	72.8	56,731	27.2	208,778	45,683,102	66.7	22,853,529	33.3	68,536,631	
2022	105,679	76.6	32,370	23.4	138,049	34,650,346	68.5	15,933,297	31.5	50,583,643	
<b>Subtotal</b>	<b>425,159</b>	<b>73.2</b>	<b>155,524</b>	<b>26.8</b>	<b>580,683</b>	<b>126,574,261</b>	<b>67.1</b>	<b>60,662,401</b>	<b>32.9</b>	<b>187,236,662</b>	
<b>Small Business</b>											
2020	163,453	87.1	24,307	12.9	187,760	12,285,685	94.9	661,371	5.1	12,947,056	
2021	148,855	84.3	27,740	15.7	176,595	8,018,083	92.9	616,673	7.1	8,634,756	
2022	104,598	78.4	28,813	21.6	133,411	4,651,379	89.5	547,005	10.5	5,198,384	
<b>Subtotal</b>	<b>416,906</b>	<b>83.8</b>	<b>80,860</b>	<b>16.2</b>	<b>497,766</b>	<b>24,955,147</b>	<b>93.2</b>	<b>1,825,049</b>	<b>6.8</b>	<b>26,780,196</b>	
<b>Small Farm</b>											
2020	1,553	92.6	124	7.4	1,677	191,330	91.6	17,574	8.4	208,904	
2021	1,151	91.3	110	8.7	1,261	134,226	90.3	14,443	9.7	148,669	
2022	563	88.9	70	11.1	633	80,238	88.7	10,182	11.3	90,420	
<b>Subtotal</b>	<b>3,267</b>	<b>91.5</b>	<b>304</b>	<b>8.5</b>	<b>3,571</b>	<b>405,794</b>	<b>90.6</b>	<b>42,199</b>	<b>9.4</b>	<b>447,993</b>	
<b>Total</b>	<b>845,332</b>	<b>78.1</b>	<b>236,688</b>	<b>21.9</b>	<b>1,082,020</b>	<b>151,935,202</b>	<b>70.8</b>	<b>62,529,649</b>	<b>29.2</b>	<b>214,464,851</b>	
<i>Source: 2020, 2021, and 2020 HMDA and CRA Data.</i>											

## **Geographic Distribution**

The overall geographic distribution of loans reflects good penetration throughout the assessment areas. The tables in Appendix D detail the geographic distribution of loans for each state and multi-state MSA. Performance was consistent among most of the rated areas. However, geographic distribution performance was adequate among the Chattanooga, Louisville, and Columbus Multi-state MSAs.

### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment areas. The bank's performance in low- and moderate-income census tracts was similar to the demographic and aggregate lending data in most assessment areas. Performance was considered good among all rated areas with the exception of the Chattanooga and Louisville Multi-state MSAs where performance was adequate.

### *Small Business Loans*

The geographic distribution of small business loans reflects good penetration throughout the assessment areas. The bank's performance in low- and moderate-income census tracts for small business loans was similar to the demographic and aggregate lending data in most assessment areas. The geographic distribution was good in all rated areas with the exception of the Chattanooga, Columbus, and Louisville Multi-state MSAs where performance was adequate.

### *Small Farm Loans*

The geographic distribution of small farm loans reflects good penetration throughout the assessment areas. In most assessment areas, Truist originated too few small farm loans to perform a meaningful analysis. As a result, small farm lending was only reviewed in the following assessment areas: Montgomery County MD, Lancaster MSA; and NC Non-MSA. Performance was consistent among the rated areas.

Additional detail is available in the analyses of each assessment area by state and multi-state MSA contained in this Performance Evaluation.

## **Borrower Profile**

The overall distribution of borrowers reflects good penetration. Penetration is good among retail customers of different income levels and excellent among businesses of different sizes. In addition, lending to small farms reflects excellent penetration. Performance varied across assessment areas. Specifically, performance was good among rated areas but was excellent in Florida, Maryland, Alabama, New Jersey, West Virginia, the Washington Multi-state MSA, the Cincinnati Multi-state MSA, and the Columbus Multi-state MSA. Performance generally compared favorably to the aggregate lending and demographic data.

### Home Mortgage Loans

Borrower distribution of home mortgage loans reflects good penetration among retail customers of different income levels. In most assessment areas, Truist's lending performance to low- and moderate-income borrowers was similar to the aggregate lending data and the percent of low- and moderate-income families. Performance was good in the rated areas with the exception of Maryland, Alabama, New Jersey, and the Washington and Cincinnati Multi-state MSAs where performance was excellent.

### Small Business Loans

The distribution of borrowers reflects excellent penetration among businesses of different sizes. In each of the rated areas, the bank's performance was well above the aggregate lending data but below the demographic data. Performance was consistent among all rated areas.

### Small Farm Loans

The distribution of borrowers reflects excellent penetration among farms of different sizes. The bank's small farm lending performance was generally well above the aggregate lending data but slightly below demographic data. Performance varied among rated areas but was either good or excellent.

Additional detail is available in the analyses of each assessment area by state and multi-state MSA contained in this Performance Evaluation.

## **Innovative and/or Flexible Lending Practices**

Truist uses innovative and/or flexible lending programs in order to serve the assessment areas' credit needs. Detailed below is a summary of the programs offered. The programs are available in all assessment areas with the exception of the Truist Mortgage Grant and State Housing Agencies, which were offered in certain assessment areas.

### Mortgage Loan Programs

Truist offers flexible and affordable housing loans through the following Federal government agencies: Federal Housing Administration (FHA), Veterans Administration (VA), and United States Department of Agriculture (USDA) Rural Development. These programs provide affordable home ownership opportunities to low- and moderate-income families. The programs also offer flexible underwriting criteria, government guarantees, lower down-payment requirements, and closing cost assistance. Truist also offers mortgages through various state housing agencies. These programs target first-time homebuyers and low- and moderate-income borrowers and provide below market interest rates and flexible terms.

Truist also participates in Freddie Mac's Home Possible and Fannie Mae's HomeReady first-time homebuyer (FTHB) programs. These programs provide affordable home ownership opportunities to low- and moderate-income families. Both programs offer flexible underwriting criteria, lower

down-payment requirements, and reduced mortgage insurance coverage. During the evaluation period, Truist originated over 12,000 loans totaling \$2.4 million to support low- and moderate-income, first-time homebuyers.

Truist also offers a down-payment assistance grant, Truist Mortgage Grant. Truist Mortgage Grant helps low- and moderate-income borrowers purchase a primary home through Fannie Mae's HomeReady program. The grants are offered in assessment areas with high housing costs that create financial difficulties for low- and moderate-income borrowers. The grants help low- and moderate-income borrowers meet down-payment requirements for the purchase of a home. Truist Mortgage Grant offers eligible borrowers a 3.0 percent of the purchase price or appraised value, whichever is less, up to a maximum amount of \$7,500. During the evaluation period, Truist provided over 3,400 grants totaling \$21.8 million throughout 41 assessment areas. In addition, Truist partnered with the Federal Home Loan Bank (FHLB) of Atlanta's Affordable Housing Program. The FHLB of Atlanta's Affordable Housing Program provides a down-payment and closing-cost assistance subsidy for low- and moderate-income homebuyers funded through the FHLB. During the evaluation period, Truist originated 266 mortgage loans through the partnership, which provided \$1.8 million in grants to low- and moderate-income individuals.

Truist further offers Community Homeownership Incentive Program (CHIP), a proprietary affordable mortgage loan product. CHIP is targeted to low- and moderate-income individuals and provides long-term fixed rate financing. Private mortgage insurance is not required, lower down-payment options are available, and underwriting requirements are more flexible than conventional mortgage loans. Throughout the evaluation period, Truist provided over \$187.3 million in CHIP loans to more than 1,100 low- and moderate-income individuals.

The number of loans originated through these programs represents approximately 4.4 percent of all HMDA loans originated during the evaluation period. Detailed in the following table, are loans originated under innovative and/or flexible mortgage loan programs for this CRA evaluation period.

Innovative and/or Flexible Lending Programs								
Type of Program	2020		2021		2022		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
CHIP	896	142,525	182	30,897	78	13,898	1,156	187,320
Truist Mortgage Grant	773	3,875	1,293	8,737	1,378	9,237	3,444	21,849
FHLB Grants	164	921,470	48	412,500	54	442,500	266	1,776,470
State Housing Agencies*	114	13,382	85	10,914	110	6,323	309	30,619
Freddie Mac and Fannie Mae (FTHB)^	3,775	707,408	5,698	1,165,938	2,564	544,633	12,037	2,417,979
FHA	1,028	215,113	619	136,616	580	136,140	2,227	487,869
VA	2,933	879,784	1,782	539,232	739	253,531	5,454	1,672,547
USDA	408	67,666	273	52,162	127	23,312	808	143,140
<b>Totals</b>	<b>10,091</b>	<b>2,951,223</b>	<b>9,980</b>	<b>2,356,996</b>	<b>5,630</b>	<b>1,429,574</b>	<b>25,701</b>	<b>6,737,793</b>

Source: Bank Records  
\*2020: Virginia, North Carolina, Maryland, Florida, Kentucky, West Virginia, South Carolina, Georgia, Texas  
\*2021: Virginia, North Carolina, Maryland, Florida, Kentucky, West Virginia, South Carolina, Tennessee  
\*2022: Virginia, North Carolina, Maryland, Florida, Georgia, Texas, Alabama, Tennessee  
^Home Possible and HomeReady

### Business Loan Programs

Truist offers several flexible small business programs for sole proprietors and businesses that would otherwise not qualify for standard commercial loans. Truist is a Preferred Lender for the SBA and offers the following loan programs: Express, Small Loan Advantage, 7(a), and 504. During the COVID-19 pandemic, Truist participated in the SBA PPP. The program provided forgivable loans to eligible businesses to maintain employees on the payroll during the COVID-19 pandemic. Of the total PPP loans originated, 93.5 percent by number and 84.8 percent by dollar amount were either small business, small farm, or community development loans demonstrating responsiveness to community credit needs. The following table shows loans made through flexible small business loan programs during this evaluation period.

Innovative and/or Flexible Small Business and Farm Loan Programs								
Type of Program	2020		2021		2022		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
SBA-non PPP	251	266,660	222	309,421	176	313,530	649	889,611
PPP	82,047	12,631,619	37,843	3,657,552	0	0	119,890	16,289,171
<b>Totals</b>	<b>82,298</b>	<b>12,898,279</b>	<b>38,065</b>	<b>3,966,973</b>	<b>176</b>	<b>313,530</b>	<b>120,539</b>	<b>17,178,782</b>

Source: Bank Records

### Small Dollar Loan Programs

Truist offers two small dollar loan programs: Truist Cash Reserve and Truist Ready Now Loan. Truist Cash Reserve is an unsecured, revolving line of credit up to \$750 intended to help prevent declined transactions and/or overdraft fees and to provide financing for emergency needs. Truist began offering Truist Cash Reserve in December 2022. There is no credit inquiry for opening the account, no prepayment penalties, and no late fees associated with the line of credit. All advances

are subject to an annual percentage rate of 18.0 percent, and advances are repaid from a Truist checking account in 4 monthly payments. During the evaluation period, Truist advanced \$9.4 million to 18,268 accountholders.

Truist Ready Now Loan is an unsecured loan available in \$100 increments, up to \$1,000 with a 6-month payment term. Truist began offering the Ready Now Loan in October 2021. There is a \$5 origination fee per \$100 borrowed. The Ready Now Loan does not charge any interest, late fees, or prepayment penalties. During the evaluation period, Truist originated 958 Ready Now Loans totaling \$792,900.

### **Community Development Loans**

Truist is a leader in making community development loans. The institution originated 7,174 community development loans totaling \$16.1 billion during the evaluation period. This performance represents 5.3 percent of average total loans (\$302.6 billion) and 3.1 percent of average total assets (\$515.1 billion) as of December 31, 2022. Further, community development lending performance is generally favorable when compared to the performance of three similarly-situated institutions. Specifically, comparable bank ratios of community development loans to average total loans ranged from 2.7 percent to 8.1 percent. The ratios of community development loans to average total assets ranged from 1.6 percent to 5.0 percent.

Since the prior evaluation, the number and dollar volume of community development loans increased by 304.6 percent and 154.7 percent, respectively. Further, the bank originated 24 community development loans totaling \$915.0 million outside the assessment areas. Since these loans benefit the broader regional or state-wide areas, which include the assessment area and the bank was responsive to the needs of the assessment areas, these loans were included in the overall community development lending performance.

Truist's community development lending continues to provide a source of capital that impacts community and social economic needs. Since the previous evaluation, the bank has identified and responded to community needs by financing affordable housing, community service needs, economic development initiatives, and revitalization and stabilization efforts, including disaster recovery. These loans were highly responsive to the opportunities for community development lending, especially in the rated areas of Florida, North Carolina, Washington Multi-state MSA, Georgia, Texas, Virginia, and Maryland.

The following tables present community development lending by purpose and year, as well as rated area.

Community Development Lending by Activity Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020	176	1,321,576	227	832,487	3,171	4,075,554	387	965,719	3,961	7,195,336
2021	152	1,236,982	284	1,306,236	2,085	1,273,427	91	681,686	2,612	4,498,331
2022	190	2,008,330	145	707,218	123	529,784	143	1,190,223	601	4,435,555
<b>Total</b>	<b>518</b>	<b>4,566,888</b>	<b>656</b>	<b>2,845,941</b>	<b>5,379</b>	<b>5,878,765</b>	<b>621</b>	<b>2,837,628</b>	<b>7,174</b>	<b>16,129,222</b>
<i>Source: Bank Records</i>										

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Florida	77	713,250	115	992,430	1,160	1,099,621	157	671,229	1,509	3,476,530
North Carolina	73	221,697	116	259,518	744	768,607	63	383,622	996	1,633,444
Georgia	60	627,790	60	292,224	414	580,848	166	583,073	700	2,083,935
Virginia	50	268,857	66	161,382	513	451,878	17	144,211	646	1,026,328
Maryland	26	177,977	29	119,481	410	456,909	8	50,606	473	804,973
Texas	32	571,041	13	71,966	146	271,542	15	119,466	206	1,034,015
Pennsylvania	25	21,298	41	126,318	247	269,014	8	55,952	321	472,582
South Carolina	24	63,319	30	64,497	169	232,028	32	100,597	255	460,441
Tennessee	21	179,774	15	32,262	220	191,041	57	182,938	313	586,015
Alabama	6	53,637	10	24,560	51	90,512	14	234,420	81	403,129
New Jersey	11	40,476	8	9,257	54	101,150	3	2,488	76	153,371
West Virginia	5	1,041	44	22,852	66	62,141	10	29,966	125	116,000
Kentucky	0	0	6	27,468	28	35,199	11	27,803	45	90,470
Washington MSA	32	537,267	34	160,965	742	730,677	7	59,221	815	1,488,130
Charlotte MSA	51	332,861	33	52,558	195	212,087	14	41,528	293	639,034
Myrtle Beach MSA	1	540	1	7,500	17	54,920	2	1,950	21	64,910
Louisville MSA	0	0	3	25,269	25	27,199	0	0	28	52,468
Chattanooga MSA	2	22,200	3	8,258	44	43,897	16	35,550	65	109,905
Cincinnati MSA	3	18,529	4	4,448	36	89,017	3	39,293	46	151,287
Memphis MSA	0	0	12	197,161	64	61,531	16	73,667	92	332,359
Hagerstown MSA	1	225	6	4,200	14	17,335	0	0	21	21,760
Columbus MSA	0	0	2	5,141	10	1,492	2	48	14	6,681
Kingsport MSA	0	0	0	0	5	5,059	0	0	5	5,059
Cumberland MSA	1	130	1	1,250	2	50	0	0	4	1,430
Regional Activities	17	714,979	4	174,976	3	25,011	0	0	24	914,966
<b>Total</b>	<b>518</b>	<b>4,566,888</b>	<b>656</b>	<b>2,845,941</b>	<b>5,379</b>	<b>5,878,765</b>	<b>621</b>	<b>2,837,628</b>	<b>7,174</b>	<b>16,129,222</b>
<i>Source: Bank Records</i>										



The following are examples of community development loans that benefitted the larger regional area.

- \$5.0 million loan to refinance educational and childcare facilities that serve children from low- and moderate-income families in North Carolina, Texas, South Carolina, Tennessee, and Florida.
- \$5.0 million loan to a non-profit organization that supports micro and small business lending in Alabama, Georgia, Maryland, and Texas.
- \$4.0 million loan to a non-profit organization that provides funding for CDFIs supporting affordable housing in the Appalachian region.

Performance was considered Outstanding in the rated-areas with the exception of Kentucky and the Myrtle Beach, Louisville, Hagerstown, Columbus, Kingsport, and Cumberland Multi-state MSAs where performance was High Satisfactory. The rated areas and full-scope assessment areas include detailed discussions of community development lending activities.

## **INVESTMENT TEST**

The overall Investment Test rating for Truist is Outstanding. The bank has an excellent level of qualified investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. In addition, the bank exhibits excellent responsiveness to credit and community development needs and makes significant use of innovative and/or complex investments to support community development initiatives. The bank demonstrated excellent Investment Test performance throughout a majority of its rated areas, particularly in the states where most of the bank's deposits and branches are located. The overall performance of Outstanding is consistent among 15 of the 24 rated areas. The other 9 rated areas are considered High Satisfactory. Also, contributing to the overall Outstanding rating are the bank-wide investments, which are not specifically included or allocated to the rated areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. During the evaluation period, the bank made 6,143 qualified investments totaling nearly \$5.8 billion. Of the total amount, \$4.1 billion are new qualified investments, \$1.4 billion are prior period investments, and \$274.3 million are grants and donations. Investment activity represents 1.1 percent of average total assets and 4.7 percent of average total securities as of December 31, 2022. In addition, the level of qualified investments provided during the current evaluation period is significantly higher than the \$1.8 billion provided during the prior evaluation period, where investments consisted of 0.8 percent of average total assets and 3.7 percent of average total securities.

The bank primarily fulfills its qualified investment objectives through a combination of Low-Income Housing Tax Credit (LIHTC) investments in funds and projects with several organizations; government mortgage-backed securities (MBS); SBA bond and loan pool securities; and, investments in Small Business Investment Companies (SBIC) and Community Development

Financial Institutions (CDFI). Additionally, the bank provided a large number of qualified grants, charitable donations, and in-kind donations.

Bank-wide investments account for \$498.5 million of the total qualified investments. These investments impact multiple rated areas and assessment areas and are only discussed in the overall narrative as applicable. The bulk of the nationwide investments supports economic development for \$433.1 million. Most of these are through SBICs, which are investment funds licensed and regulated by the SBA. SBIC's use their capital plus funds borrowed with an SBA-guarantee to make equity and debt investments into qualifying small businesses throughout the bank's footprint. These investments enable small businesses, who may not normally qualify for conventional financing, to obtain financial support, which is an identified need in many areas.

The following tables show qualified investments by rated area, purpose, and year. The bulk of investments by dollar volume support affordable housing; however, community services represent the largest category by number due to the large number of community service grants. Further details and examples of specific qualified investment, grant, and donation activities are provided under each rated area and full-scope assessment area.

<b>Qualified Investments by Year</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Prior Period	438	1,376,576	-	-	-	-	-	-	<b>438</b>	<b>1,376,576</b>
2020	110	639,526	8	33,065	39	84,249	6	9,902	<b>163</b>	<b>766,742</b>
2021	255	1,092,151	6	13,822	136	491,455	21	40,845	<b>418</b>	<b>1,638,273</b>
2022	333	1,270,201	4	18,080	252	354,440	7	53,640	<b>596</b>	<b>1,696,361</b>
<b>Subtotal</b>	<b>1,136</b>	<b>4,378,454</b>	<b>18</b>	<b>64,967</b>	<b>427</b>	<b>930,144</b>	<b>34</b>	<b>104,387</b>	<b>1,615</b>	<b>5,477,952</b>
Qualified Grants & Donations	475	21,711	3,343	143,843	643	100,414	67	8,310	<b>4,528</b>	<b>274,278</b>
<b>Total</b>	<b>1,611</b>	<b>4,400,165</b>	<b>3,361</b>	<b>208,810</b>	<b>1,070</b>	<b>1,030,558</b>	<b>101</b>	<b>112,697</b>	<b>6,143</b>	<b>5,752,230*</b>

Source: Bank Records  
 \*Total does not match the following table due to rounding

Qualified Investments by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Florida	298	950,650	569	17,381	253	211,113	9	40,177	1,129	1,219,321
North Carolina	230	535,562	513	19,634	93	71,859	14	12,257	850	639,312
Georgia	211	824,698	273	30,355	99	103,586	10	15,471	593	974,110
Virginia	178	391,657	239	12,235	90	36,006	3	1,374	510	441,272
Maryland	86	310,268	171	8,581	51	8,781	1	6	309	327,636
Texas	76	96,736	168	4,351	48	13,689	5	3,581	297	118,357
Pennsylvania	57	105,033	256	19,301	76	47,437	15	2,452	404	174,223
South Carolina	60	103,176	134	4,119	36	15,337	4	4,759	234	127,391
Tennessee	52	166,809	126	6,917	33	18,883	3	25	214	192,634
Alabama	33	49,404	91	6,612	39	19,870	7	7,623	170	83,509
New Jersey	10	7,780	33	887	12	1,889	2	100	57	10,656
West Virginia	48	50,217	115	2,215	42	2,656	8	118	213	55,206
Kentucky	25	31,774	46	713	17	573	6	180	94	33,240
Washington MSA	102	448,039	179	24,682	42	11,117	4	4,328	327	488,166
Charlotte MSA	44	158,328	156	13,168	22	8,938	0	0	222	180,434
Myrtle Beach MSA	10	14,603	9	98	3	1,578	2	125	24	16,404
Louisville MSA	22	36,988	39	1,561	10	4,280	0	0	71	42,829
Chattanooga MSA	9	21,237	33	759	10	14,351	0	0	52	36,347
Cincinnati MSA	12	20,656	55	683	18	1,604	2	20	87	22,963
Memphis MSA	14	32,171	52	9,163	9	2,247	0	0	75	43,581
Hagerstown MSA	9	12h,284	17	748	2	25	0	0	28	13,057
Columbus MSA	9	1,955	10	134	9	1,557	1	1,722	29	5,368
Kingsport MSA	6	3,510	12	122	4	57	0	0	22	3,689
Cumberland MSA	2	10	6	3,945	3	35	0	0	11	3,990
Bank-wide Activities	8	26,620	59	20,447	49	433,090	5	18,380	121	498,537
<b>Total</b>	<b>1,611</b>	<b>4,400,165</b>	<b>3,361</b>	<b>208,811</b>	<b>1,070</b>	<b>1,030,558</b>	<b>101</b>	<b>112,698</b>	<b>6,143</b>	<b>5,752,232</b>

Source: Bank Data  
 \*Total does not match the previous table due to rounding

The rated areas and full-scope assessment areas include detailed discussions of qualified investment activities. The following are examples of qualified investments that benefitted the larger regional area.

- \$125,000 grant to a non-profit organization that serves community CDFIs in the Appalachian region.
- \$10.0 million investment in a CDFI that provides small business lending in low- and moderate-income areas throughout the assessment areas.
- \$5.0 million investment in a SBIC that supports economic development in 13 states within the bank's footprint.

## **Responsiveness to Credit and Community Development Needs**

Truist exhibits overall excellent responsiveness to credit and community development needs. Since the prior evaluation, bank management made a concerted effort to ensure new investments and donations were concentrated in the assessment areas, which further supports the bank's responsiveness to assessment area community development needs. The bank continues to be responsive in providing for affordable housing, social service, and small business community development needs primarily through investments in LIHTCs, MBSs, SBA bonds and loan pools, SBICs, New Market Tax Credits (NMTC), CDFIs, and Minority and Women-Owned Depository Institutions (MDI).

Truist continues to invest in LIHTCs through syndicators of tax credits for affordable housing throughout their footprint. The syndicators create new investment funds to finance multi-family developments that utilize tax incentives provided through the LIHTC program. These syndicators are typically non-profit organizations that promote homeownership by investing equity capital in qualified LIHTC projects. LIHTCs are considered particularly responsive as these investments enable developers to gain access to capital markets to complete a project that would not otherwise be financially feasible. The community gains quality affordable housing, which attracts residents and businesses in areas that would not traditionally attract such investments without enhanced incentives. In addition, the present examination period saw a shrinking supply of affordable housing, which was exacerbated by higher home prices and rental costs in nearly all the assessment areas. The bidding process for investing in LIHTCs has also become increasingly competitive as banks and insurance companies look to provide for community needs while maintaining a nominal rate of return. During the evaluation period, Truist invested in 275 LIHTCs projects for over \$2.0 billion. In addition, nearly all the prior-period investments were LIHTCs.

Similarly, MBSs are also an investment that provides liquidity and leverage to the affordable housing capital markets to enable the origination of additional affordable mortgage loans. MBSs help meet community needs in both rural and urban areas throughout the assessment areas as they are typically pools of much smaller loans, while LIHTCs are primarily concentrated on larger projects in more urban areas. MBSs are considered responsive as additional affordable housing was a near universal need in the assessment areas over the evaluation period. During the evaluation period, Truist invested in 435 MBSs for nearly \$900.0 million.

Truist continues to expand its support of economic development efforts through investments in SBA bonds and loan pools throughout the bank's footprint. As a Federal agency, the SBA offers loan guarantees through its loan programs, assisting small businesses that are unable to otherwise secure financing through normal lending channels. This was identified as a significant small business credit need in the assessment areas. The bank made investments in these bonds and loan pools totaling \$324.0 million over the evaluation period.

A SBIC is a privately-owned and managed investment fund licensed and regulated by the SBA. A SBIC uses its capital, plus funds borrowed with a SBA guarantee, to make equity and debt investments in qualifying small businesses. Investments in SBICs are considered responsive to credit needs as they provide access to loans and capital to small businesses that would not normally

qualify for conventional financing, which is an expressed need in the assessment areas. Truist has invested in several SBICs totaling \$491.0 million during the examination period.

CDFIs are federally-regulated depository institutions with a primary mission of community development. CDFIs are required to have at least 60.0 percent of their financing activities targeted to low- and moderate-income populations or underserved communities. CDFI equity investments help support greater access to capital for projects that strengthen underserved communities, such as by providing affordable housing, healthcare, education, youth services, assistance for the unhoused, and access to healthy and fresh food. Truist has invested in CDFIs totaling \$15.0 million during the examination period.

The NMTC is an investment program under the CDFI Fund that attracts private capital into low-income and distressed communities by permitting investors to receive a tax credit against their Federal income tax in exchange for making equity investments in specialized financial intermediaries called Community Development Entities. Truist uses these investments to address unmet credit needs in communities to help create jobs, provide education, healthcare, and other critical services to underserved areas. During the evaluation period, the bank invested in 69 NMTC projects totaling \$185.0 million.

Truist has 140 Community Advisory Boards (CAB) across its footprint in order to better understand and be more responsive to community needs. The purpose of these boards is to help fulfill Truist's corporate purpose, mission, and values. They also help strengthen customer relationships and provide the bank valuable feedback through outreach activities in the assessment areas. This enables the bank to identify and target investment opportunities that are particularly responsive to unmet financial needs in the assessment areas. In addition, in 2019, the bank made a three-year commitment to low- and moderate-income and majority-minority communities through the Community Benefits Plan (CBP). The CBP is tailored to support affordable housing, non-profit organizations, and small businesses. It was developed after several community listening sessions and with advice and input from CAB members, leaders from non-profit organizations, CDFIs, and other community advocates.

Grants and donations are particularly responsive to charitable and/or community-based organizations. Many organizations rely on these contributions to continue providing services. The bank made 4,528 qualified donations, including in-kind donations, and grants totaling \$274.3 million during the review period. For example, the bank launched the Truist Cares initiative at the start of the COVID pandemic, providing more than \$50.0 million in philanthropic support to aid charities meeting basic needs, furnishing medical supplies, and addressing financial hardships across the assessment areas.

As the bank's responsiveness is overall excellent throughout the rated areas and assessment areas, the Investment Test conclusions with regards to responsiveness are not further discussed in detail. Additional comments are only provided in the rated areas and full-scope assessment areas where the bank's performance differs from the overall level of performance.

## **Community Development Initiatives**

The bank makes significant use of innovative and/or complex investments to support community development initiatives. LIHTC, MBSs, SBA pools, and SBIC investments make up the majority of qualified investments since the prior evaluation. Although these types of investments are not considered particularly innovative, they are considered complex as they are often collateralized specifically to benefit a particular assessment area. In addition, since the last evaluation, Truist has established numerous relationships with community development partners to leverage their capacity. In several of the bank's community development projects, not only is Truist providing additional capital across multiple investment types, such as LIHTCs, but they also layer additional support by providing private equity investment funds, project financing, and philanthropic support, for example. These complex arrangements make it possible to further extend the bank's capacity to meet community development needs in even the most underserved and distressed areas.

As the bank makes significant use of innovative and/or complex investments throughout the rated areas and assessment areas, the Investment Test conclusions with regards to this performance criteria are not further discussed in detail. Additional comments are only provided in the rated areas and full-scope assessment areas where the bank's performance differs from the overall level of performance.

## **SERVICE TEST**

The overall Service Test rating for this institution is Outstanding. Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas, and the opening and closing of branches throughout the assessment areas has generally not adversely affected the accessibility of its delivery systems. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies, and/or individuals. In addition, Truist is a leader in providing community development services. Performance in the rated areas was generally consistent with the overall performance as 18 of the 24 rated areas are also considered Outstanding with 5 rated areas noted as High Satisfactory and 1 rated area considered Low Satisfactory.

## **Accessibility of Delivery Systems**

Truist's delivery systems are accessible to essentially all portions of the institution's assessment areas. As of December 31, 2022, Truist operated 2,094 branches with 1,357 or 64.8 percent located in Florida, North Carolina, Georgia, Virginia, Maryland, and the Washington Multi-state MSA. Consequently, examiners placed more weight on the performance in these 6 areas.

Overall, Truist's branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. Refer to the rated areas' and assessment areas' conclusion sections for additional details regarding each area's branch distribution. The following table details the branch distribution by geographic income level.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	1,877	7.0	6,503,691	5.9	119	5.7	1	2.8	22	2.6
Moderate	6,391	23.7	25,239,732	22.9	453	21.6	14	38.9	181	21.2
Middle	10,335	38.4	43,819,833	39.7	838	40.0	9	25.0	317	37.2
Upper	7,599	28.2	33,422,475	30.3	648	31.0	10	27.8	321	37.6
NA	736	2.7	1,341,781	1.2	36	1.7	2	5.5	12	1.4
<b>Totals</b>	<b>26,938</b>	<b>100.0</b>	<b>110,327,512</b>	<b>100.0</b>	<b>2,094</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>853</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.*

### **Changes in Branch Locations**

To the extent changes have been made, Truist’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies, and/or to low- and moderate-income individuals. As shown in the table above, the bank opened 36 branches with 2.8 percent in low-income census tracts and 38.9 percent in moderate-income census tracts. The bank closed 853 branches with 2.6 percent in low-income census tracts and 21.2 percent in moderate-income census tracts. This activity resulted in a reduction of 21 branches located in low-income census tracts and 167 branches in moderate-income census tracts. However, the closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger with SunTrust Bank as of December 7, 2019. Consequently, the remaining branch offices are located in close proximity to the closing branches, minimizing concerns regarding accessibility to banking services.

Changes in branch locations are only discussed in the assessment areas where changes occurred.

### **Reasonableness of Business Hours and Services**

Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies, and/or individuals. Truist offers a diverse range of products and services tailored to meet the needs of its assessment areas. These include consumer and commercial loan products, such as affordable home mortgage programs, government-sponsored loan programs for home mortgage borrowers and small businesses, and cost-effective deposit products for consumers, small businesses, and non-profit organizations.

Although business hours vary at some locations, business hours are generally 9:00 a.m. to 5:00 p.m. on Monday through Friday, with select locations open on Saturdays. Additionally, branch drive thru hours either mirror business hours or are extended to meet each assessment area’s needs.

Truist provides multiple delivery channels to serve its customers. In addition to its branch network, Truist operated 3,162 automated teller machines (ATMs) as of December 31, 2022, including 650

stand-alone ATMs. Customers can access a range of additional services such as online banking, bill payment, mobile banking, a customer care center, and a toll-free 24-hour automated telephone-banking center. The online banking services are accessible 24-hours a day, allowing customers to check account balances, transfer money between accounts, make loan payments, and pay bills.

Truist's website provides free resources, including financial calculators, home purchasing information, and resources for small businesses. Finally, Truist has 800 multi-cultural branches focused on meeting the needs and representing the diversity of cultures and languages of the communities served.

This performance is generally consistent throughout all assessment areas. Therefore, the Service Test conclusions for each rated area and full-scope assessment area omit further discussion of business hours and services.

### **Community Development Services**

Truist is a leader in providing community development services. The bank demonstrated excellent leadership by assessing community development needs and implementing initiatives to address those needs. Truist based these initiatives on information from CRA committees, capacity building efforts, and active involvement with non-profit organizations.

During the evaluation period, bank employees completed 12,938 services that met the definition of community development. This represents an increase of 55.2 percent compared to the 8,334 activities reported in the previous evaluation. Truist's directors, officers, and employees supported these efforts by providing financial expertise and technical assistance to local and state-wide organizations whose missions are consistent with the definition of community development. The type and level of financial and technical assistance provided varied depending on the employee and organization. However, the assistance generally continued from year-to-year and was targeted to low- and moderate-income individuals and areas and small businesses. In addition to the activities in each rated area, 49 of the community development services were conducted within the broader regional areas predominantly consisting of virtual financial literacy sessions for low- and moderate-income individuals during the Covid-19 pandemic.

Truist's total community development services equate to approximately 2.1 community development services per branch per year. Furthermore, 81.5 percent of the community development services are categorized as community services activities. The following tables provide the community services by rated area and purpose and then by activity year and purpose.



Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Florida	151	2,381	202	74	<b>2,808</b>
North Carolina	79	1,075	99	7	<b>1,260</b>
Georgia	113	939	186	6	<b>1,244</b>
Virginia	72	1,019	57	0	<b>1,148</b>
Maryland	114	520	82	1	<b>717</b>
Texas	41	433	156	2	<b>632</b>
Pennsylvania	62	714	81	2	<b>859</b>
South Carolina	28	658	79	0	<b>765</b>
Tennessee	18	366	60	0	<b>444</b>
Alabama	25	352	21	1	<b>399</b>
New Jersey	7	125	15	0	<b>147</b>
West Virginia	19	159	91	17	<b>286</b>
Kentucky	4	213	19	3	<b>239</b>
Washington MSA	30	632	168	1	<b>831</b>
Charlotte MSA	27	380	23	2	<b>432</b>
Myrtle Beach MSA	0	100	21	0	<b>121</b>
Louisville MSA	9	108	4	0	<b>121</b>
Chattanooga MSA	3	91	9	0	<b>103</b>
Cincinnati MSA	3	51	22	4	<b>80</b>
Memphis MSA	6	85	13	0	<b>104</b>
Hagerstown MSA	20	36	3	0	<b>59</b>
Columbus MSA	8	15	8	2	<b>33</b>
Kingsport MSA	5	31	4	0	<b>40</b>
Cumberland MSA	2	15	0	0	<b>17</b>
Regional Activities	5	43	1	0	<b>49</b>
<b>Total</b>	<b>851</b>	<b>10,541</b>	<b>1,424</b>	<b>122</b>	<b>12,938</b>

*Source: Bank records from January 1, 2020 through December 31, 2022*

Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020	299	1,396	469	18	<b>2,182</b>
2021	343	3,520	692	25	<b>4,580</b>
2022	209	5,625	263	79	<b>6,176</b>
<b>Total</b>	<b>851</b>	<b>10,541</b>	<b>1,424</b>	<b>122</b>	<b>12,938</b>

*Source: Bank records from January 1, 2020 through December 31, 2022*

The rated areas and full-scope assessment areas include detailed discussions of community development services. The following are examples of community development services that benefitted the larger regional area.

- A bank officer serves on the Board of Directors of a non-profit organization that supports affordable housing in Virginia, Maryland, West Virginia, and the District of Columbia.
- Three bank employees conducted a virtual technical assistance seminar on the affordable housing grant process. The seminar reached 36 non-profit organizations serving the Appalachian region.
- A bank employee conducted a virtual financial literacy seminar for students in schools that primarily serve children from low- and moderate-income families. The seminar reached students in North Carolina, Virginia, South Carolina, and the District of Columbia.

Truist's community development service activities demonstrate excellent responsiveness, innovation, and complexity. These efforts are exemplified by their collaborative capacity building initiatives with partnership organizations. In addition, the bank has displayed leadership and responsiveness by promoting financial literacy through its education initiatives. An overview of the bank's community development service initiatives is provided below.

## **Financial Education**

### Operation Hope

Truist partners with Operation Hope, whose mission is to fight poverty by bringing financial literacy and equity programs to low- and moderate-income individuals. In April of 2021, Truist announced a \$20 million commitment to Operation HOPE over 4 years. Through this partnership, Truist will support and amplify Operation HOPE's work across its programs.

- Operation HOPE coaches - Truist currently has 760 branches with financial coaches who help clients learn about and solve every day financial challenges. Coaches offer one-on-one sessions and group workshops on topics such as access to mainstream credit, how to accelerate savings, debt reduction, how to start a business, and paths to homeownership. Truist has also completed 214 volunteer hours in support of Operation HOPE's 1 Million Black Businesses volunteer initiative.
- NFL + Operation HOPE + Week of Care - Truist teamed up with National Football League teams, including the Atlanta Falcons and Miami Dolphins, for the Operation HOPE "Week of Care" event. Truist and the National Football League collaborated with local community organizations to host programs that supported low- and moderate-income individuals and families.
- HOPE Carried Forward - Truist donated the Tucker, GA branch to Operation HOPE, which is turning it into a community hub with offices, conference rooms, and flexible open spaces for educational discussions and group gatherings. Operation HOPE coaches will also have space to provide financial counseling and answer financial questions. The donation of the branch was part of Truist's broader \$20 million investment to Operation HOPE to support financial education and other major initiatives.

### Truist Financial Foundations

Since 2010, Truist has collaborated with the digital learning company EverFi to offer the Truist Financial Foundations online educational courses for high school and college students as well as

adults. These courses enhance individuals' decision-making abilities and knowledge on subjects such as how credit scores work, how to plan for loans and repayment terms, and how to budget. Notably, between 2020 and 2022, Truist Financial Foundations for high school students reached over 521,000 students, including 142,000 low- and moderate-income students. The College Financial Wellness program reached over 9,000 college students and the Financial Foundations for Adults program reached more than 4,000 adults.

### *Bank on Your Success*

Truist continued to expand its proprietary Bank on Your Success curriculum. The multiple-module curriculum is available in several languages and has a topic library that includes Banking and Budgeting Basics, Growing Your Business, Becoming a Homeowner, and Budgeting During a Crisis. Truist has taught and collaborated on sessions of Bank on Your Success at its branches, minority churches, community groups, and colleges and universities across its footprint. Since the last evaluation, the bank has held over 6,000 sessions, reaching more than 104,000 individuals.

### *FDIC Money Smart*

Truist uses the FDIC Money Smart financial education program to support its initiatives for consumer and small business education. Since the previous evaluation, the bank has utilized Money Smart for Adults, Money Smart for Young Adults, and Money Smart for Small Business during various financial literacy events. This comprehensive suite of programs helps the bank empower consumers and small businesses to improve financial literacy and foster beneficial banking relationships.

## **Other Initiatives**

### *Truist One Banking*

Truist offers a range of personal and commercial deposit products designed to meet customer financial needs. In 2022, Truist introduced two new deposit accounts designed to eliminate overdraft fees.

Truist One Checking is the flagship checking account that eliminates overdraft and overdraft-related fees, such as negative account balance fees and returned item fees. It features a \$100 negative balance buffer for qualifying customers that allows them to overdraw their account by up to \$100 without incurring any charges. Additionally, Truist One Checking offers a deposit-based line of credit up to \$750 without relying on traditional credit scores. Customers can repay the line of credit over several months. Truist One Checking has a monthly maintenance fee that Truist waives for clients engaging in a minimal level of monthly account activity.

Truist Confidence Account is an alternative account created for customers seeking simplicity and control without overdraft fees. This product complements Truist's existing "Bank On" certified demand deposit products making mainstream banking more accessible to customers and helping them avoid high fees associated with check-cashing services and payday lenders. The Truist Confidence Account has a nominal monthly maintenance fee that Truist waives for clients engaging in a minimal amount of monthly account activity.

In addition to the new Truist One Banking products, Truist took action to benefit its existing deposit account clients. In 2022, Truist eliminated returned item fees, overdraft protection transfer fees, and negative account balance fees on its deposit accounts. Truist also reduced the number of potential daily overdraft fees from six to three.

#### Multi-cultural Banking Centers and Multi-cultural Banking Leaders

Truist has a network of 800 multi-cultural branches across 24 geographic regions. These branches are dedicated to serving and reflecting the diversity of African American, Asian American, Pacific Islander, and Hispanic communities. Moreover, each region has a multi-cultural committee committed to fostering an inclusive, culturally-sensitive banking experience. The bank also has 6 multi-cultural banking leaders that serve as community ambassadors and cultural influencers. Truist's Multi-cultural Banking Office has established strong relationships with over 600 diverse community partners, including faith-based organizations, ethnic chambers of commerce, community action groups, and educational institutions. This network helps Truist better understand the needs of the communities it serves.

#### Community Development Advisory Groups

Truist established Community Development Advisory Groups to provide a platform to cross-share mission focused initiatives, community and organizational updates, programs, and best practices. Truist strategically selects the Advisory Group members to align with the needs of the communities the bank serves.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners evaluated the bank's compliance with the antidiscrimination laws and regulations, as well as various other consumer protection laws and regulations.

Findings from a 2021 Consumer Financial Protection Bureau targeted review resulted in a violation of the Equal Credit Opportunity Act. The violations were limited to one loan product, with minimal impact. The bank implemented changes to policies, procedures, and training programs to help prevent future discriminatory credit practices.

In addition, the FDIC identified lending-related violations of Section 5 of the Federal Trade Commission Act regarding Unfair or Deceptive Acts or Practices. The impact and severity of the violations was minimal compared to the overall scale of the bank's lending activity. To correct each of the violations, Truist implemented changes to loan agreements, systems, and policies and procedures to help prevent future illegal credit practices from occurring. The bank also voluntarily provided restitution to affected customers.

The violations were considered in the CRA rating. Based on the bank's CRA performance, extent and impact of the findings, and appropriate corrective actions taken, a downgrade of the CRA rating was not warranted.

## FLORIDA

### CRA RATING FOR FLORIDA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

The evaluation of performance in Florida considered the operations of Truist in 25 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 464, or 22.2 percent, of its total branch offices in Florida. Florida accounts for 19.9 percent of bank-wide deposits, 16.3 percent of bank-wide lending by dollar volume, and 20.8 percent of bank-wide loans by number. Overall, Truist ranks 3<sup>rd</sup> in the state in deposit market share at 9.9 percent. Competitor institutions in the Florida assessment areas include Bank of America, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A.

### SCOPE OF EVALUATION – FLORIDA

Based on the lending and deposit volume and branching, examiners conducted full-scope reviews of the bank's performance in the Tampa and Orlando MSA assessment areas and the Miami, Fort Lauderdale, and West Palm Beach MD assessment areas. Limited scope areas included the North Port, Jacksonville, Deltona, Cape Coral, Palm Bay, Lakeland, Port St. Lucie, Ocala, Naples, Tallahassee, Homosassa Springs, Pensacola, Punta Gorda, Crestview, Gainesville, Sebastian, The Villages, Panama City, and Sebring MSA assessment areas, and the FL Non-MSA assessment area. Home mortgage and small business loans constitute the primary loan types. During the review period, small business loans were given more weight when considering the number and dollar volume of these products in the state.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

#### LENDING TEST

The Lending Test is rated High Satisfactory for Florida. Lending levels reflect good responsiveness to the Florida assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects excellent distribution. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Florida assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Florida assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Good performance is consistent among the five full-scope assessment areas, which supports the conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of small business loans is excellent among businesses of different sizes in the five full-scope assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels in the five full-scope assessment areas. Overall excellent performance among the five full-scope assessment areas is consistent and supports the conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in Florida. During this evaluation period, the bank originated 1,509 community development loans totaling \$3.5 billion. This performance represents 21.0 percent by number and 21.6 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 252 community development loans totaling \$1.2 billion were made.

Since the previous evaluation, Truist has originated 11 loans totaling \$111.3 million benefitting a broader state-wide area that includes the assessment areas. Examples of the state-wide loans are provided below.

- three loans totaling \$92.1 million to a regional health services entity that provides its services primarily to low- and moderate-income families.
- \$10.0 million loan to invest capital in a state-wide CDFI, whose mission is to support innovative lending programs as well as provide financial and technical assistance to entities that support community development initiatives.
- \$1.0 million loan to a state-wide CDFI, whose mission is to provide affordable small dollar loans primarily to low- and moderate-income persons, who are unable to obtain financing in the private credit marketplace

Performance is consistent among the full-scope assessment areas. The analysis for each full-scope Florida assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding for Florida. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments, and occasionally serves in a leadership position. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Florida. The bank provided 1,129 qualified investments for \$1.2 billion. This represents 21.2 percent of bank-wide qualified investments, which exceeds the 19.9 percent of branches and 16.3 percent of deposits in the state. Of the total qualified investments, 295 were new investments for \$886.3 million, 69 were prior-period investments for \$307.2 million, and 765 were grants for \$25.8 million. The bulk of qualified investments in Florida supports affordable housing.

On a state-wide level, the bank provided 17 grants for \$3.3 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Florida. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited. Limited-scope assessment areas only include the total number and dollar volume of new investments, prior-period investments, and grants.

### **SERVICE TEST**

The Service Test rating for Florida is Outstanding. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 464 branches in Florida, which represents 22.2 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects branch distribution by tract income level.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	229	4.6	824,700	3.9	18	3.9	0	0.0	5	2.3
Moderate	1,249	24.9	5,232,872	24.8	102	22.0	7	38.9	41	18.8
Middle	1,910	38.0	8,288,266	39.4	174	37.5	6	33.3	86	39.4
Upper	1,471	29.3	6,465,993	30.7	161	34.7	4	22.2	84	38.5
NA	164	3.3	246,352	1.2	9	1.9	1	5.6	2	0.9
<b>Totals</b>	<b>5,023</b>	<b>100.0</b>	<b>21,058,183</b>	<b>100.0</b>	<b>464</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>218</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or individuals. As shown in the table above, the bank opened 18 and closed 218 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in Florida. Bank records show that employees participated in 2,808 community development services since the last evaluation. This performance represents 21.7 percent of bank-wide activities, which is consistent with the state-wide share of branches at 22.2 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated area needs. Examples of community development services are provided under each full-scope assessment area; however, Florida had 6 community development services that benefited the entire state. The following are examples of community development services that benefited the entire state.

- A bank employee serves on the Board of a non-profit economic development organization that supports Hispanic small businesses.
- A bank employee serves on the Board of a non-profit organization that provides services to low- and moderate-income individuals experiencing food insecurity.
- A bank employee serves on the Board of a non-profit organization that seeks to increase the number of first-time Hispanic homebuyers by supporting programs and policies that expand down-payment assistance.

The following table details the number of community development services, by assessment area and community development purpose.



<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Tampa MSA	33	513	13	2	561
Orlando MSA	11	244	53	1	309
Miami MD	12	262	17	0	291
Fort Lauderdale MD	57	193	22	0	272
West Palm Beach MD	4	187	17	0	208
Jacksonville MSA	15	116	19	0	150
North Port MSA	2	153	9	0	164
Deltona MSA	1	97	20	0	118
Cape Coral MSA	3	34	6	70	113
Palm Bay MSA	0	68	4	0	72
Lakeland MSA	0	74	4	0	78
Naples MSA	0	81	0	0	81
Port St Lucie MSA	0	33	8	0	41
Ocala MSA	0	39	3	0	42
Tallahassee MSA	3	33	0	0	36
FL Non-MSA	1	22	4	1	28
Pensacola MSA	0	26	1	0	27
Crestview MSA	0	35	0	0	35
Homosassa Springs MSA	1	30	0	0	31
Gainesville MSA	0	26	0	0	26
Punta Gorda MSA	6	15	0	0	21
The Villages MSA	0	29	0	0	29
Sebastian MSA	0	25	0	0	25
Panama City MSA	1	28	0	0	29
Sebring MSA	0	15	0	0	15
State-wide Activities	1	3	2	0	6
<b>Total</b>	<b>151</b>	<b>2,381</b>	<b>202</b>	<b>74</b>	<b>2,808</b>
<i>Source: Bank Records</i>					

## TAMPA MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA MSA ASSESSMENT AREA

The Tampa MSA assessment area consists of all 4 counties within the Tampa-St. Petersburg-Clearwater, FL MSA. The bank operates 85, or 18.3 percent, of its Florida branch offices in the Tampa MSA assessment area. The assessment area also represents 16.3 percent of the rated-area loans by dollar volume. 17.7 percent of rated-area lending by number of loans, and 19.3 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. However, the moderate-income tracts contain a fair level of owner-occupied housing and businesses. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 3.2 million, and the number of census tracts increased to 788. Regarding housing costs, the median housing value increased significantly to \$221,635, and the median gross rent increased to \$1,184. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Tampa MSA Assessment Area</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	746	5.5	26.1	36.3	29.8	2.3
Population by Geography	2,888,458	4.5	24.4	38.0	32.7	0.4
Housing Units by Geography	1,368,924	4.3	25.4	39.2	30.9	0.2
Owner-Occupied Units by Geography	737,411	1.9	21.9	39.7	36.5	0.1
Occupied Rental Units by Geography	408,090	8.5	29.3	38.6	23.2	0.4
Vacant Units by Geography	223,423	4.7	30.0	38.8	26.3	0.1
Businesses by Geography	538,242	4.2	20.7	34.1	40.7	0.3
Farms by Geography	12,646	3.1	24.8	38.9	33.1	0.1
Family Distribution by Income Level	702,244	21.6	17.9	19.1	41.4	0.0
Household Distribution by Income Level	1,145,501	24.0	16.3	17.5	42.2	0.0
Median Family Income - Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$155,283
			Median Gross Rent			\$979
			Families Below Poverty Level			11.2%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Tampa MSA assessment area was 2.8 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and retail trade. The top employers were BayCare Health System, Publix Super Markets Incorporated, Hillsborough County School District, HCA West Florida Division, and MacDill Air Force Base.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 54 FDIC-insured institutions operated 615 branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 12.8 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from economic development organizations within the Tampa MSA assessment area were referenced. Both contacts indicated a need for small business lending and financial counseling. One contact also identified multiple opportunity zones in distressed communities in need of economic development through affordable housing and job creation.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data and information from community contacts, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less at 92.9 percent supports this conclusion. Additionally, affordable housing represents a need as 39.5 percent of the families are low- or moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE TAMPA MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the Tampa MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent lending distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Small business loans received greater weight than home mortgage loans when considering the

number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending performance in moderate-income census tracts increased to 26.0 percent, which was consistent with demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, lending performance increased to 25.7 percent, which was above demographic data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families even when families below the poverty level are considered. However, the bank's performance was similar to the aggregate lending data. Lending to moderate-income borrowers was consistent with both demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The bank originated 74.0 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 87.0 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Tampa MSA assessment area. The bank originated 258 community development loans totaling \$425.7 million. This amount represents 17.1 percent by number and 12.2 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 14 loans supported affordable housing, 24 loans supported community services, 176 loans supported economic development, and 44 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$16.1 million construction loan to develop a multifamily housing project providing 108 units of affordable housing. This was a complex transaction that also included a \$19.0 million LIHTC equity investment by Truist.
- \$12.9 million loan for a multifamily apartment complex providing 96 units of affordable housing for low- and moderate-income families.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Tampa MSA assessment area. Qualified investments total \$229.9 million, or 4.0 percent, of bank-wide qualified investments which is comparable to the percent of deposits, 3.8, and branches, 4.1, in this assessment area. Investments included 83 new investments for \$195.2 million, 10 prior-period investments for \$31.8 million, and 106 grants totaling \$2.9 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$27.3 million in LIHTCs to finance a 108-unit affordable multifamily housing development. The property is located in a moderate-income census tract and all units are restricted for low-income residents.
- \$19.0 million in LIHTCs to finance the construction of a 108-unit affordable multifamily housing development. All units are restricted to households earning 60 percent or less of the area median income.
- \$16.9 million in LIHTCs to finance the construction of a 230-unit affordable multifamily housing development. All units are restricted to households earning 70 percent or less of the area median income.
- \$11.5 million in MBSs to finance a 300-unit affordable multifamily housing development for senior citizens. All units are restricted to households earning 60 percent or less of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 17 low-income and 92 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	37	4.7	121,046	3.8	5	5.9	0	0.0	1	3.4
Moderate	220	27.9	832,924	26.2	18	21.2	0	0.0	8	27.6
Middle	289	36.7	1,189,966	37.5	35	41.2	1	100.0	10	34.5
Upper	217	27.5	1,000,406	31.5	26	30.6	0	0.0	9	31.0
NA	25	3.2	30,933	1.0	1	1.2	0	0.0	1	3.4
<b>Totals</b>	<b>788</b>	<b>100.0</b>	<b>3,175,275</b>	<b>100.0</b>	<b>85</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 1 and closed 29 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 561 community development services. This performance represents 20.0 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 18.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a community health center that provides strategically targeted services to underserved, low-income, uninsured, and underinsured communities.
- A bank employee serves on the Board of a community service organization that provides financial literacy, work readiness, and entrepreneurship learning experiences to low- and moderate-income individuals.
- A bank employee serves on the Board of an economic development organization that facilitates the redevelopment and general improvement of low- and moderate-income areas.

## ORLANDO MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ORLAND MSA ASSESSMENT AREA

The Orlando MSA assessment area consists of all 4 counties within the Orlando-Kissimmee-Sanford, FL MSA. The bank operates 59, or 12.7 percent, of its Florida branch offices in the Orlando MSA assessment area. The assessment area also represents 14.8 percent of the rated-area loans by dollar volume, 14.1 percent of rated-area lending by number of loans, and 19.2 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts, with a good level in the moderate-income tracts and significantly less in the low-income tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.7 million, and the number of census tracts increased to 490. Regarding housing costs, the median housing value increased significantly to \$242,858, and the median gross rent increased to \$1,294. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Orlando MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	390	3.6	29.7	35.9	30.3	0.5
Population by Geography	2,277,816	2.5	28.2	36.9	32.4	0.0
Housing Units by Geography	964,253	2.7	28.0	38.6	30.7	0.0
Owner-Occupied Units by Geography	487,196	1.0	21.1	39.1	38.8	0.0
Occupied Rental Units by Geography	310,972	5.2	37.9	35.6	21.4	0.0
Vacant Units by Geography	166,085	2.9	29.7	43.1	24.3	0.0
Businesses by Geography	493,068	1.7	26.1	35.1	37.1	0.0
Farms by Geography	10,389	1.2	25.0	41.1	32.5	0.2
Family Distribution by Income Level	532,416	21.5	18.1	19.2	41.2	0.0
Household Distribution by Income Level	798,168	23.0	16.9	18.4	41.7	0.0
Median Family Income - Orlando-Kissimmee-Sanford, FL MSA	\$57,304		Median Housing Value			\$162,453
			Median Gross Rent			\$1,056
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.                      Due to rounding, totals may not equal 100.0 percent.                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Orlando MSA assessment area was 3.0 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, leisure and hospitality services, and education and health services. The top employers were Walt Disney World Resort, Advent Health, Universal Studios Florida, Orlando Health, and Orlando International Airport.

### **Competition**

Competition in the assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 42 FDIC-insured institutions operated 469 branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 21.6 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from economic development organizations with the Orlando MSA assessment area were referenced. Both contacts identified a need for financial counseling to small business owners and prospective owners. In addition, one contact identified a need to assist small businesses with obtaining seed capital, venture debt, and equity financing. Also, the contact indicated that the greatest economic weakness is affordable housing.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data and information from the community contacts, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less at 93.4 percent supports this conclusion. Additionally, affordable housing represents a need as 39.6 percent of the families are low- or moderate-income. Information from the community contacts also provides similar needs within the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ORLANDO MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the Orlando MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution lending among borrowers of different income levels and business of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Small business loans received greater weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.



### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending performance in moderate-income census tracts increased to 20.7 percent, which was similar to demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Lending performance in moderate-income census tracts was slightly below both demographic and aggregate lending data. However, in 2020, lending performance in moderate-income census tracts was consistent with both demographic and aggregate lending data. In 2022, lending performance increased to 24.9 percent, which was consistent with demographic data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families even when families below the poverty level are considered. However, the bank's performance was similar to the aggregate lending data. Lending to moderate-income borrowers was consistent with demographic data and exceeded aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The bank originated 81.0 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Orlando MSA assessment area. The bank originated 255 community development loans totaling \$815.8 million. This amount represents 16.9 percent by number and 23.5 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 15 loans supported affordable housing, 15 loans supported community services, 207 loans supported economic development, and 18 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$75.2 million loan to a school district for capital improvement projects, such as construction and renovation of educational facilities. The school district predominantly serves low- and moderate-income students.
- \$52.8 million loan and a \$23.0 million loan to construct multifamily housing developments that provided 331 and 138 units, respectively. All units at both properties will provide

affordable housing for low- and moderate-income senior citizens.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Orlando MSA assessment area. Qualified investments total \$255.4 million, or 4.4 percent of bank-wide qualified investments, which exceeds the percent of deposits, 3.8, and the percent of branches, 2.8, in this assessment area. Investments included 21 new investments for \$171.9 million, 9 prior-period investments for \$77.5 million, and 100 grants totaling \$6.0 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$39.8 million in LIHTCs to finance the construction of a 331-unit affordable multifamily housing development for senior citizens. The property is located in a moderate-income census tract and all units are restricted to households earning 60 percent or less of the area median income.
- \$26.7 million in LIHTCs to support the renovation of a 384-unit affordable multifamily housing development. All units are restricted to households earning 60 percent or less of the area median income, including 96 units set aside for households earning less than 33 percent of the area median income.
- \$18.8 million in LIHTCs to finance the construction of a 138-unit affordable multifamily housing development. All units are restricted to households earning 70 percent or less of the area median income.
- \$17.8 million in MBSs to finance the renovation of a 256-unit affordable multifamily housing development. All units are restricted to households earning 30 percent or less of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 5 low-income and 29 moderate-income tracts. The ATM distribution is

consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	20	4.1	100,202	3.7	3	5.1	0	0.0	1	3.7
Moderate	141	28.8	713,773	26.7	13	22.0	0	0.0	7	25.9
Middle	172	35.1	952,799	35.6	18	30.5	0	0.0	10	37.0
Upper	151	30.8	879,212	32.9	24	40.7	1	100.0	9	33.3
NA	6	1.2	27,390	1.0	1	1.7	0	0.0	0	0.0
<b>Totals</b>	<b>490</b>	<b>100.0</b>	<b>2,673,376</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 1 and closed 27 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 309 community development services. This performance represents 11.0 percent of all activities in the state, which is below the assessment area’s share of state-wide branches at 12.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of an economic development organization that advocates for greater access to credit, capital, and other financial products for underserved small businesses.
- A bank employee serves on the Board of a non-profit organization that specializes in providing loans and technical assistance to minority and underserved small businesses.
- Bank employees facilitated multiple sessions of a financial literacy course for low- and moderate-income students that covered financial management

## MIAMI MD ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MIAMI MD ASSESSMENT AREA

The Miami MD assessment area consists of Miami-Dade County, which is the only county within the Miami-Miami Beach-Kendall, FL MD. The bank operates 44, or 9.5 percent, of its Florida branch offices in the Miami MD assessment area. The assessment area also represents 9.4 percent of the rated-area loans by dollar volume, 9.3 of rated-area loans by number of loans, and 9.5 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts; however, the moderate-income tracts also contain a good level of owner-occupied housing and businesses. Significantly lower levels of owner-occupied housing and businesses are located in the low-income tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.7 million, and the number of census tracts increased to 707. Regarding housing costs, the median housing value increased significantly to \$346,191, and the median gross rent increased to \$1,418. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Miami MD Assessment Area</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	519	5.8	27.7	28.9	34.1	3.5
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	791,580	3.1	20.8	26.3	47.5	2.3
Farms by Geography	7,895	3.9	23.7	27.1	44.5	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.5	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income - Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Miami MD assessment area was 2.6 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and retail trade. The top employers were Publix Super Markets, Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University.

### **Competition**

Competition in the assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 56 FDIC-insured institutions operated 589 branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> in total deposits with a market share of 4.2 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations within the Miami MD assessment area were referenced. One contact from a housing agency indicated a need for affordable multifamily properties and homes. The contact indicated the housing crisis caused many low- and moderate-income individuals to leave the market. Another contact from a non-profit organization indicated a need for small business lending, more specifically, start-up funding, revolving loan funds, and grant programs.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data and community contact information, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less at 94.7 percent supports this conclusion. Additionally, affordable housing represents a need as 40.6 percent of the families are low- or moderate-income. The community contacts also provided that affordable housing and small business lending are needed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MIAMI MD ASSESSMENT AREA**

### **LENDING TEST**

Lending Test performance in the Miami MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Small business loans received greater weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. However, in 2020 lending performance was above aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families even when families below the poverty level are considered. However, the bank's performance was similar to the aggregate lending data. Lending to moderate-income borrowers was below demographic data but consistent with aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The bank originated 76.5 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Miami MD assessment area. The bank originated 146 community development loans totaling \$389.9 million. This amount represents 9.7 percent by number and 11.2 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 12 loans supported affordable housing, 16 loans supported community services, 102 loans supported economic development, and 16 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans totaling \$48.1 million to acquire and rehabilitate a multifamily apartment complex providing 334 units of affordable housing. This was a complex transaction that also included an \$18.7 million LIHTC equity investment by Truist.
- \$4.0 million bridge loan to support the land acquisition of a new headquarters for a non-

profit entity in a moderate-income geography designated as an Opportunity Zone, which also promotes job creation.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Miami MD assessment area. Qualified investments total \$130.2 million, or 2.3 percent of bank-wide qualified investments, which exceeds the percent of deposits, 1.9, and the percent of branches, 2.1, in this assessment area. Investments included 18 new investments for \$73.2 million, 13 prior-period investments for \$53.6 million, and 85 grants totaling \$3.4 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$18.7 million in LIHTCs to finance the renovation of a 334-unit affordable multifamily housing development for senior citizens. All units are restricted to households earning 65 percent or less of the area median income.
- \$9.3 million in LIHTCs to finance the renovation of a 288-unit affordable multifamily housing development. All units are restricted to households earning 60 percent or less of the area median income.
- \$8.9 million in LIHTCs to finance a 214-unit affordable multifamily housing development. All units are restricted to households earning 70 percent or less of the area median income.
- \$7.3 million in MBSs to support the renovation of a mixed-use property in a low-income area. The property includes 78 units for low-income tenants and other retail spaces.

## **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts. However, the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 4 low-income and 21 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	34	4.8	128,841	4.8	0	0.0	0	0.0	1	3.4
Moderate	176	24.9	705,173	26.1	11	25.0	2	33.3	6	20.7
Middle	221	31.3	873,882	32.3	10	22.7	2	33.3	4	13.8
Upper	243	34.4	936,847	34.7	18	40.9	1	16.7	18	62.1
NA	33	4.7	57,024	2.1	5	11.4	1	16.7	0	0.0
<b>Totals</b>	<b>707</b>	<b>100.0</b>	<b>2,701,767</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 6 and closed 29 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 291 community development services. This performance represents 10.4 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 9.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the loan committee of a non-profit organization that originates microloans to entrepreneurs and low-interest loans to low- and moderate-income families.
- A bank employee served as an instructor at a workshop targeted to first-time homebuyers and low- and moderate-income families.
- Several bank employees provided financial literacy training for low- and moderate-income students that included banking basics and family budgeting.



## FORT LAUDERDALE MD ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FORT LAUDERDALE MD ASSESSMENT AREA

The Fort Lauderdale MD assessment area consists of Broward County, which is the sole county within the Fort Lauderdale-Pompano Beach-Sunrise, FL MD. The bank operates 43, or 9.3 percent, of its Florida branch offices in the Fort Lauderdale MD assessment area. The assessment area also represents 8.9 percent of the rated-area loans by dollar volume, 8.8 percent of rated-area loans by number of loans, and 12.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels also in the moderate-income census tracts. Owner-occupied housing and businesses in the low-income census tract are limited. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.9 million, and the number of census tracts increased to 417. Regarding housing costs, the median housing value increased significantly to \$291,831, and the median gross rent increased to \$1,479. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Fort Lauderdale MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	362	5.5	29.3	32.3	32.3	0.6
Population by Geography	1,843,152	5.1	28.9	32.7	33.3	0.0
Housing Units by Geography	814,454	5.4	28.7	33.2	32.7	0.0
Owner-Occupied Units by Geography	425,691	2.8	24.8	34.0	38.4	0.0
Occupied Rental Units by Geography	244,593	9.4	34.6	33.2	22.9	0.0
Vacant Units by Geography	144,170	6.6	30.2	30.7	32.4	0.0
Businesses by Geography	512,701	4.9	25.0	30.6	39.6	0.0
Farms by Geography	6,220	5.4	29.4	29.1	36.1	0.0
Family Distribution by Income Level	425,680	22.3	17.3	18.7	41.7	0.0
Household Distribution by Income Level	670,284	24.4	16.1	17.3	42.2	0.0
Median Family Income - Fort Lauderdale- Pompano Beach-Sunrise, FL MD	\$61,809	Median Housing Value				\$206,124
		Median Gross Rent				\$1,233
		Families Below Poverty Level				11.2%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Fort Lauderdale MD assessment area was 2.9 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and retail trade. The top employers were Nova Southeastern University, First Service Residential, HEICO, Spirit Airlines, and American Express.

### **Competition**

Competition in the assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 44 FDIC-insured institutions operated 390 branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 13.0 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from an affordable housing organization within the Fort Lauderdale MD assessment area was referenced. The contact indicated a need for affordable housing due to high demand and low supply of homes, which is causing the rent and home prices to significantly increase.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data and information from the community contact, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less at 94.3 percent supports this conclusion. Additionally, affordable housing represents a need as 39.6 percent of the families are low- or moderate-income. The community contact also stated that affordable housing is needed given the increase in rent and home prices.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE FORT LAUDERDALE MD ASSESSMENT AREA**

### **LENDING TEST**

Lending Test performance in the Fort Lauderdale MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Small business loans received greater weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending performance in moderate-income census tracts increased to 27.7 percent, which exceeded demographic lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered. However, the bank's performance was similar to the aggregate lending data. Lending to moderate-income borrowers was below demographic data but consistent with aggregate lending data. In 2020, lending performance in moderate-income census tracts was consistent with demographic data and well above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The bank originated 74.2 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Fort Lauderdale MD assessment area. The bank originated 182 community development loans totaling \$387.3 million. This amount represents 12.1 percent by number and 11.1 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 12 loans supported affordable housing, 14 loans supported community services, 141 loans supported economic development, and 15 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$43.0 million loan to a healthcare company that primarily serves low- and moderate-income children for the purpose of acquiring another healthcare company and expanding business operations.
- \$20.8 million loan to support an organization's mission, which is to revitalize and stabilize multiple low-income geographies through its redevelopment projects.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Fort Lauderdale MD assessment area. Qualified investments total \$131.6 million, or 2.3 percent of bank-wide qualified investments, which is comparable to the percent of deposits, 2.4, and the percent of branches, 2.1, in this assessment area. Investments included 12 new investments for \$99.8 million, 5 prior-period investments for \$28.5 million, and 85 grants totaling \$3.3 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$27.5 million in LIHTCs to finance the construction of a 121-unit affordable multifamily housing development. The property is located in a low-income census tract and all units are restricted to households earning 70 percent or less of the area median income.
- \$14.0 million in MBSs to support the renovation of a mixed-use property in a moderate-income census tract. The property is located in an Opportunity Zone and includes 142 units of affordable housing and retail and commercial space.
- \$12.7 million in LIHTCs to finance the construction of a 78-unit affordable multifamily housing development. The property is located in a moderate-income census tract and all units are restricted to households earning 70 percent or less of the area median income.
- \$7.8 million in LIHTCs to finance the construction of an 88-unit affordable multifamily housing development for senior citizens. All units are restricted to households earning 60 percent or less of the area median income.

## **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 6 low-income and 22 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	20	4.8	72,746	3.7	2	4.7	0	0.0	0	0.0
Moderate	120	28.8	585,564	30.1	11	25.6	0	0.0	3	15.8
Middle	125	30.0	575,580	29.6	11	25.6	0	0.0	6	31.6
Upper	144	34.5	690,035	35.5	19	44.2	0	0.0	9	47.4
NA	8	1.9	20,450	1.1	0	0.0	0	0.0	1	5.3
<b>Totals</b>	<b>417</b>	<b>100.0</b>	<b>1,944,375</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed 19 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 272 community development services. This performance represents 9.7 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 9.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides early childhood education programs for low-income children.
- A bank employee serves on the Board of a non-profit organization that provides programs to support work readiness, entrepreneurship, and financial literacy skills for low- and moderate-income students.
- A bank employee serves on the Board of a non-profit organization that provides afterschool programs for low- and moderate-income children.

## WEST PALM BEACH MD ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WEST PALM BEACH MD ASSESSMENT AREA

The West Palm Beach MD assessment area consists of Palm Beach County, which is the sole county within the West Palm Beach-Boca Raton-Delray Beach, FL MD. The bank operates 38, or 8.2 percent, of its Florida branch offices in the West Palm Beach MD assessment area. The assessment area also represents 6.7 percent of the rated-area loans by dollar volume, 7.3 percent of rated-area loans by number of loans, and 5.7 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. Moderate-income census tracts contain a good level of owner-occupied housing units and businesses while significantly lower levels are found within the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.5 million, and the number of census tracts increased to 373. Regarding housing costs, the median housing value increased significantly to \$321,748, and the median gross rent increased to \$1,481. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the West Palm Beach MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	338	7.7	27.8	27.2	34.0	3.3
Population by Geography	1,378,806	7.3	27.5	30.9	33.9	0.4
Housing Units by Geography	671,317	6.0	27.5	30.4	35.8	0.3
Owner-Occupied Units by Geography	369,521	3.1	23.3	32.7	40.6	0.2
Occupied Rental Units by Geography	165,084	12.3	35.9	29.8	21.7	0.4
Vacant Units by Geography	136,712	6.0	28.7	25.0	39.9	0.4
Businesses by Geography	361,739	5.3	21.6	29.3	43.1	0.6
Farms by Geography	7,093	6.1	23.3	32.7	37.5	0.4
Family Distribution by Income Level	332,725	22.8	17.3	17.8	42.1	0.0
Household Distribution by Income Level	534,605	24.5	16.1	16.9	42.5	0.0
Median Family Income - West Palm Beach-Boca Raton-Boynton Beach, FL MD		\$65,914	Median Housing Value			\$230,203
			Median Gross Rent			\$1,229
			Families Below Poverty Level			10.5%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the West Palm Beach MD assessment area was 2.8 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and leisure and hospitality services. The top employers were Tenet Healthcare Corporation, NextEra Energy/Florida Power and Light Company, Florida Atlantic University, Hospital Corporation of America, and Boca Raton Regional Hospital.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 48 FDIC-insured institutions operated 393 branches within this area. Of these institutions, Truist ranked 5<sup>th</sup> in total deposits with a market share of 6.6 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the West Palm Beach MD assessment area. One contact identified a need for small business lending and financial literacy. Additionally, the contact indicated a need for funding and support for small business development, workforce development, housing, and human services. Another contact indicated the need for access to capital and flexible loans for small businesses.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.1 percent of the families are low- and moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN WEST PALM BEACH MD ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the West Palm Beach MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment

area. Small business loans received greater weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending performance in moderate-income census tracts increased to 27.2 percent, which exceeded demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. The bank's performance in low-income census tracts was consistent with both demographic and aggregate lending data. Lending performance in moderate-income census tracts was consistent with demographic lending data but below aggregate lending data. In 2020, lending performance was consistent with both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families, even when families below the poverty level are considered. However, the bank's performance was similar to the aggregate lending data. Lending to moderate-income borrowers was below demographic lending data; however, consistent with aggregate lending data. In 2020 and 2022, lending performance was consistent with demographic lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The bank originated 75.4 percent of small business loans to businesses with annual gross revenues of \$1.0 million or less. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 80.0 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the West Palm Beach MD assessment area. The bank originated 130 community development loans totaling \$206.3 million. This amount represents 8.6 percent by number and 5.9 percent by dollar volume of total community development loans originated in Florida. Regarding the community development purpose, 2 loans supported affordable housing, 7 loans supported community services, 104 loans supported economic development, and 17 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$11.0 million loan to an organization whose mission is to revitalize and stabilize a community comprised of low- and moderate-income census tracts. This financing supports a redevelopment project for road improvements.



- \$9.8 million loan to finance construction of a commercial retail center, which provides commercial space for businesses and jobs for low- and moderate-income persons.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the West Palm Beach MD assessment area. Qualified investments total \$66.8 million, or 1.2 percent of bank-wide qualified investments, which is comparable to the percent of deposits, 1.1 but below the percent of branches, 1.8, in this assessment area. Investments included 14 new investments for \$45.2 million, 5 prior-period investments for \$20.7 million, and 68 grants totaling \$963,137. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$14.5 million in MBSs to finance a 330-unit affordable multifamily housing development. All units are restricted to households earning 50 percent or less of the area median income.
- \$10.9 million in LIHTCs to finance the construction of a 144-unit affordable multifamily housing development. The property is located in a low-income census tract and all units are restricted to households earning 60 percent or less of the area median income.
- \$9.5 million in LIHTCs to finance a 160-unit affordable multifamily housing development for senior citizens. The property is located in a low-income census tract and all units are restricted to households earning 70 percent or less of the area median income.
- \$4.2 million in LIHTCs to finance a 99-unit affordable multifamily housing development for senior citizens. All units are restricted to households earning 70 percent or less of the area median income.

## **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low- and moderate-income census tracts is below the percent of the population in the respective tracts but within a reasonable range. Further, branches in middle- and upper-income census tracts serve approximately 6 low-income and 23 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	25	6.7	87,659	5.9	1	2.6	0	0.0	0	0.0
Moderate	98	26.3	426,440	28.6	9	23.7	3	75.0	1	5.0
Middle	110	29.5	480,583	32.2	15	39.5	1	25.0	10	50.0
Upper	125	33.5	482,030	32.3	13	34.2	0	0.0	9	45.0
NA	15	4.0	15,479	1.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>373</b>	<b>100.0</b>	<b>1,492,191</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 4 and closed 20 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 208 community development services. This performance represents 7.4 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 8.2 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a community development organization that acquires, rehabilitates, and operates affordable housing for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that operates group homes and provides life skills and vocational training programs for low- and moderate-income adults.
- Several bank employees participated as instructors in housing finance workshops for first-time, and low- and moderate-income homebuyers.

## OTHER FLORIDA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the 20 Florida assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
North Port MSA	Consistent	Consistent	Consistent
Jacksonville MSA	Consistent	Consistent	Below
Deltona MSA	Consistent	Consistent	Consistent
Cape Coral MSA	Consistent	Consistent	Consistent
Palm Bay MSA	Consistent	Consistent	Consistent
Lakeland MSA	Consistent	Consistent	Consistent
Port St. Lucie MSA	Consistent	Below	Consistent
Ocala MSA	Consistent	Consistent	Below
Naples MSA	Consistent	Below	Consistent
Tallahassee MSA	Consistent	Consistent	Consistent
Homosassa Springs MSA	Consistent	Below	Consistent
Pensacola MSA	Consistent	Consistent	Consistent
Punta Gorda MSA	Consistent	Consistent	Consistent
Crestview MSA	Consistent	Consistent	Consistent
FL Non-MSA	Consistent	Consistent	Consistent
Gainesville MSA	Below	Consistent	Below
Sebastian MSA	Consistent	Below	Consistent
The Villages MSA	Exceeds	Below	Consistent
Panama City MSA	Consistent	Consistent	Consistent
Sebring MSA	Consistent	Consistent	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exception of the Jacksonville MSA, Ocala MSA, and Gainesville MSA assessment areas, which are below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

### North Port MSA Assessment Area

The North Port MSA assessment area consists of Manatee and Sarasota Counties. Truist operates 26 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	5,786	\$244.0 million
Home Mortgage Loans	4,334	\$1.3 billion
Small Farm Loans	3	\$188 thousand
Community Development Loans	75	\$109.8 million
Investments (New)	10	\$50.5 million
Investments (Prior Period)	6	\$21.4 million
Donations	31	\$356 thousand
CD Services	164	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the North Port MSA assessment area are in Appendix D.

### Jacksonville MSA Assessment Area

The Jacksonville MSA assessment area consists of Baker, Clay, Duval, Nassau, and St. Johns Counties. Truist operates 29 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	4,339	\$251.8 million
Home Mortgage Loans	4,969	\$1.7 billion
Small Farm Loans	6	\$644 thousand
Community Development Loans	70	\$212.5 million
Investments (New)	3	\$27.6 million
Investments (Prior Period)	7	\$47.7 million
Donations	61	\$1.6 million
CD Services	150	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Jacksonville MSA assessment area are in Appendix D.

### Deltona MSA Assessment Area

The Deltona MSA assessment area consists of Flagler and Volusia Counties. Truist operates 18 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	5,059	\$188.8 million
Home Mortgage Loans	3,028	\$622.0 million
Small Farm Loans	7	\$911 thousand
Community Development Loans	51	\$44.0 million
Investments (New)	26	\$28.3 million
Investments (Prior Period)	4	\$12.4 million
Donations	23	\$495 thousand
CD Services	118	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Deltona MSA assessment area are in Appendix D.

### Cape Coral MSA Assessment Area

The Cape Coral MSA assessment area consists of Lee County. Truist operates 18 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	4,594	\$162.0 million
Home Mortgage Loans	2,667	\$594.8 million
Small Farm Loans	9	\$860 thousand
Community Development Loans	57	\$307.8 million
Investments (New)	27	\$42.5 million
Investments (Prior Period)	0	\$0
Donations	20	\$297 thousand
CD Services	113	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Cape Coral MSA assessment area are in Appendix D.

### **Palm Bay MSA Assessment Area**

The Palm Bay MSA assessment area consists of Brevard County. Truist operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	3,766	\$181.0 million
Home Mortgage Loans	2,791	\$652.1 million
Small Farm Loans	4	\$204 thousand
Community Development Loans	51	\$36.9 million
Investments (New)	10	\$22.5 million
Investments (Prior Period)	5	\$7.7 million
Donations	20	\$414 thousand
CD Services	72	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Palm Bay MSA assessment area are in Appendix D.

### **Lakeland MSA Assessment Area**

The Lakeland MSA assessment area consists of Polk County. Truist operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	3,127	\$93.8 million
Home Mortgage Loans	1,694	\$378.6 million
Small Farm Loans	5	\$522 thousand
Community Development Loans	37	\$27.8 million
Investments (New)	16	\$28.8 million
Investments (Prior Period)	2	\$2.6 million
Donations	17	\$322 thousand
CD Services	78	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Lakeland MSA assessment area are in Appendix D.

### Port St. Lucie MSA Assessment Area

The Port St. Lucie MSA assessment area consists of Martin and St. Lucie Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,463	\$79.0 million
Home Mortgage Loans	1,751	\$358.3 million
Small Farm Loans	3	\$128 thousand
Community Development Loans	24	\$21.3 million
Investments (New)	10	\$13.1 million
Investments (Prior Period)	0	\$0
Donations	13	\$137 thousand
CD Services	41	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Port St. Lucie MSA assessment area are in Appendix D.

### Ocala MSA Assessment Area

The Ocala MSA assessment area consists of Marion County. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,817	\$72.5 million
Home Mortgage Loans	1,498	\$280.4 million
Small Farm Loans	9	\$1.3 million
Community Development Loans	18	\$6.9 million
Investments (New)	9	\$17.2 million
Investments (Prior Period)	0	\$0
Donations	12	\$153 thousand
CD Services	42	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Ocala MSA assessment area are in Appendix D.

## Naples MSA Assessment Area

The Naples MSA assessment area consists of Collier County. Truist operates ten branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,896	\$60.9 million
Home Mortgage Loans	1,365	\$525.4 million
Small Farm Loans	3	\$98 thousand
Community Development Loans	15	\$25.3 million
Investments (New)	1	\$3.0 million
Investments (Prior Period)	0	\$0
Donations	32	\$356 thousand
CD Services	81	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Naples MSA assessment area are in Appendix D.

## Tallahassee MSA Assessment Area

The Tallahassee MSA assessment area consists of Gadsden, Jefferson, Leon, and Wakulla Counties. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	959	\$50.4 million
Home Mortgage Loans	1,426	\$295.8 million
Small Farm Loans	2	\$144 thousand
Community Development Loans	33	\$113.8 million
Investments (New)	3	\$34.8 million
Investments (Prior Period)	0	\$0
Donations	21	\$456 thousand
CD Services	36	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Tallahassee MSA assessment area are in Appendix D.



## Homosassa Springs MSA Assessment Area

The Homosassa Springs MSA assessment area consists of Citrus County. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,190	\$36.1 million
Home Mortgage Loans	1,065	\$176.7 million
Small Farm Loans	1	\$15 thousand
Community Development Loans	5	\$3.1 million
Investments (New)	5	\$3.5 million
Investments (Prior Period)	0	\$0
Donations	3	\$23 thousand
CD Services	31	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Homosassa Springs MSA assessment area are in Appendix D.

## Pensacola MSA Assessment Area

The Pensacola MSA assessment area consists of Escambia and Santa Rosa Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,053	\$49.5 million
Home Mortgage Loans	1,307	\$353.0 million
Small Farm Loans	8	\$2.2 million
Community Development Loans	21	\$23.7 million
Investments (New)	3	\$2.1 million
Investments (Prior Period)	0	\$0
Donations	7	\$431 thousand
CD Services	27	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Pensacola MSA assessment area are in Appendix D.

### **Punta Gorda MSA Assessment Area**

The Punta Gorda MSA assessment area consists of Charlotte County. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,240	\$33.7 million
Home Mortgage Loans	1,066	\$200.6 million
Small Farm Loans	1	\$44 thousand
Community Development Loans	4	\$3.0 million
Investments (New)	6	\$7.8 million
Investments (Prior Period)	0	\$0
Donations	5	\$74 thousand
CD Services	21	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Punta Gorda MSA assessment area are in Appendix D.

### **Crestview MSA Assessment Area**

The Crestview MSA assessment area consists of Okaloosa and Walton Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	778	\$22.5 million
Home Mortgage Loans	1,203	\$598.1 million
Small Farm Loans	0	\$0
Community Development Loans	12	\$21.1 million
Investments (New)	1	\$2.7 million
Investments (Prior Period)	1	\$1.1 million
Donations	3	\$13 thousand
CD Services	35	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Crestview MSA assessment area are in Appendix D.

### FL Non-MSA Assessment Area

The FL Non-MSA assessment area consists of Desoto, Jackson, Monroe, and Okeechobee Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,130	\$70.0 million
Home Mortgage Loans	493	\$306.5 million
Small Farm Loans	9	\$620 thousand
Community Development Loans	13	\$50.1 million
Investments (New)	4	\$8.4 million
Investments (Prior Period)	0	\$0
Donations	14	\$218 thousand
CD Services	28	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the FL Non-MSA assessment area are in Appendix D.

### Gainesville MSA Assessment Area

The Gainesville MSA assessment area consists of Alachua, Gilchrist, and Levy Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	800	\$35.2 million
Home Mortgage Loans	781	\$204.8 million
Small Farm Loans	1	\$350 thousand
Community Development Loans	17	\$56.9 million
Investments (New)	6	\$5.9 million
Investments (Prior Period)	0	\$0
Donations	9	\$141 thousand
CD Services	26	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Gainesville MSA assessment area are in Appendix D.

### Sebastian MSA Assessment Area

The Sebastian MSA assessment area consists of Indian River County. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	737	\$22.5 million
Home Mortgage Loans	494	\$117.5 million
Small Farm Loans	1	\$38 thousand
Community Development Loans	4	\$2.4 million
Investments (New)	1	\$145 thousand
Investments (Prior Period)	0	\$0
Donations	7	\$70 thousand
CD Services	25	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Sebastian MSA assessment area are in Appendix D.

### The Villages MSA Assessment Area

The Villages MSA assessment area consists of Sumter County. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	527	\$16.8 million
Home Mortgage Loans	604	\$119.4 million
Small Farm Loans	1	\$38 thousand
Community Development Loans	6	\$2.3 million
Investments (New)	1	\$132 thousand
Investments (Prior Period)	0	\$0
Donations	0	\$0
CD Services	29	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for The Villages MSA assessment area are in Appendix D.

### **Panama City MSA Assessment Area**

The Panama City MSA assessment area consists of Bay County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	677	\$28.3 million
Home Mortgage Loans	377	\$97.4 million
Small Farm Loans	0	\$0
Community Development Loans	8	\$60.2 million
Investments (New)	1	\$89 thousand
Investments (Prior Period)	2	\$2.2 million
Donations	5	\$33 thousand
CD Services	29	--
Source: 2020-2022 HMDA and CRA LARs; Bank data from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Panama City MSA assessment area are in Appendix D.

### **Sebring MSA Assessment Area**

The Sebring MSA assessment area consists of Highlands County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	403	\$6.3 million
Home Mortgage Loans	316	\$48.0 million
Small Farm Loans	0	\$0
Community Development Loans	4	\$7.7 million
Investments (New)	4	\$2.2 million
Investments (Prior Period)	0	\$0
Donations	1	\$5 thousand
CD Services	15	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Sebring MSA assessment area are in Appendix D.

## NORTH CAROLINA

### CRA RATING FOR NORTH CAROLINA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

The evaluation of the North Carolina performance considered the operations of Truist in 15 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 225, or 10.7 percent, of its total branch offices in North Carolina. North Carolina also accounts for 9.6 percent of the bank-wide deposits, 11.4 percent of bank-wide loans by dollar volume, and 13.1 percent of bank-wide lending by number of loans. Overall, Truist ranks 2<sup>nd</sup> in the state in deposit market share at 20.1 percent. Competitor institutions in the North Carolina assessment areas include Bank of America, N.A., Wells Fargo, N.A., and First-Citizens Bank & Trust Company.

### SCOPE OF EVALUATION – NORTH CAROLINA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Raleigh MSA, NC Non-MSA, Durham MSA, and Greensboro-MSA assessment areas. Limited scope areas include the Winston-Salem, Asheville, Wilmington, Hickory, Fayetteville, Greenville, New Bern, Burlington, Goldsboro, Rocky Mount, and Jacksonville MSA assessment areas. Home mortgage and small business loans constitute the primary loan types. Based on the minimal number of loans, small farm loans were only reviewed for the NC Non-MSA assessment area.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH CAROLINA

#### LENDING TEST

The Lending Test is rated High Satisfactory for North Carolina. Lending levels reflect good responsiveness to the North Carolina assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses and farms of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the North Carolina assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each North Carolina assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage, small business, and small farm loans reflects good penetration throughout the assessment areas. Consistent good performance for home mortgage and small business loans in all four full-scope assessment areas and for small farm loans in the NC Non-MSA assessment area supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes in all full-scope assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels. In addition, the borrower distribution of small farm loans is good among farms of different sizes for the NC Non-MSA assessment area. Consistent overall good performance in all full-scope assessment areas supports the conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in North Carolina. During this evaluation period, the bank originated 996 community development loans totaling \$1.6 billion. This performance represents 13.9 percent by number and 10.1 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 315 community development loans totaling \$862.2 million were made.

Since the previous evaluation, Truist has originated 9 loans totaling \$172.9 million, benefitting a broader state-wide area that included the assessment areas. Nine loans totaling \$13.9 million were also made outside of the assessment areas but within North Carolina. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans were included. Examples of state-wide community development loans follow.

- \$100.0 million line-of-credit to a non-profit organization, whose mission is to support revitalization and stabilization efforts in low- and moderate-income geographies, as well as distressed and/or underserved geographies throughout North Carolina.
- \$15.0 million line-of-credit to a non-profit organization that provides community services to and creates jobs for visually impaired low- and moderate-income persons throughout North Carolina.

Performance is consistent throughout the full-scope assessment areas. The analysis for each full-scope North Carolina assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in North Carolina. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in North Carolina. The bank provided 850 qualified investments for \$639.3 million. This represents 11.1 percent of bank-wide qualified investments, which exceeds the 10.7 percent of branches and 9.6 percent of deposits in the state. Of the total qualified investments, 168 were new investments for \$402.4 million, 74 were prior-period investments for \$192.5 million, and 608 were grants for \$44.4 million. The bulk of qualified investments in North Carolina supports affordable housing.

On a state-wide level, the bank provided 14 grants for \$1.8 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in North Carolina. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## **SERVICE TEST**

The Service Test is rated Outstanding for North Carolina. Delivery systems are accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Truist is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment areas. Truist operates 225 branches in North Carolina, which represents 10.7 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the branch distribution by tract income level in North Carolina.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	101	5.3	348,798	4.6	18	8.0	0	0.0	2	2.4
Moderate	415	21.7	1,570,543	20.5	44	19.6	3	75.0	20	23.8
Middle	853	44.7	3,492,396	45.6	102	45.3	0	0.0	32	38.1
Upper	489	25.6	2,139,935	27.9	56	24.9	0	0.0	30	35.7
NA	51	2.7	107,257	1.4	5	2.2	1	25.0	0	0.0
<b>Totals</b>	<b>1,909</b>	<b>100.0</b>	<b>7,658,929</b>	<b>100.0</b>	<b>225</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>84</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 4 and closed 84 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in North Carolina. Bank records show that employees participated in 1,260 community development services since the last evaluation. This performance represents 9.7 percent of bank-wide activities, which is consistent with the state-wide share of branches at 10.7 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs.

Examples of community development services are provided under each full-scope assessment area; however, North Carolina had 16 community development services that benefited the entire state. The following are examples of community development services that benefitted the entire state.

- Several bank employees provided legal assistance for low- and moderate-income individuals across multiple assessment areas.
- A bank employee participated in a state-wide workforce development initiative to provide information technology certification training for low- and moderate-income individuals.
- A bank employee participated with a regional workforce development organization to provide financial education to low- and moderate-income individuals.

The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Raleigh MSA	4	154	32	0	190
NC Non-MSA	6	376	12	4	398
Durham MSA	4	109	11	0	124
Greensboro MSA	28	114	4	0	146
Winston-Salem MSA	24	73	10	3	110
Asheville MSA	2	16	1	0	19
Wilmington MSA	4	19	4	0	27
Hickory MSA	2	49	0	0	51
Fayetteville MSA	2	62	7	0	71
Greenville MSA	0	28	3	0	31
New Bern MSA	2	4	3	0	9
Burlington MSA	0	10	0	0	10
Goldsboro MSA	1	10	0	0	11
Rocky Mount MSA	0	36	11	0	47
Jacksonville MSA	0	0	0	0	0
State-wide Activities	0	15	1	0	16
<b>Total</b>	<b>79</b>	<b>1,075</b>	<b>99</b>	<b>7</b>	<b>1,260</b>
Source: Bank Records					

## RALEIGH MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE RALEIGH MSA ASSESSMENT AREA

The Raleigh MSA assessment area consists of all three counties within the Raleigh-Cary, NC MSA. The bank operates 36, or 16.0 percent, of its North Carolina branch offices in the Raleigh MSA assessment area. The assessment area also represents 28.3 percent of the rated-area loans by dollar volume, 22.0 percent of rated-area lending by number of loans, and 18.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with a good level also located in the moderate-income census tracts. Low-income census tracts provided limited lending opportunities given the low levels of owner-occupied housing and businesses. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.4 million, and the number of census tracts increased to 299. Regarding housing costs, the median housing value increased significantly to \$283,186, and the median gross rent increased to \$1,168. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Raleigh MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	224	7.6	26.3	29.5	35.3	1.3
Population by Geography	1,216,711	6.5	29.6	32.5	31.1	0.4
Housing Units by Geography	489,031	6.1	29.7	33.2	30.9	0.0
Owner-Occupied Units by Geography	295,478	3.0	26.6	35.2	35.2	0.0
Occupied Rental Units by Geography	154,647	11.5	34.3	30.3	24.0	0.0
Vacant Units by Geography	38,906	8.7	34.8	30.3	26.1	0.0
Businesses by Geography	155,295	4.3	23.8	33.4	38.4	0.1
Farms by Geography	3,852	4.6	28.4	39.5	27.5	0.0
Family Distribution by Income Level	306,186	22.3	17.4	19.2	41.2	0.0
Household Distribution by Income Level	450,125	23.1	17.2	17.8	41.9	0.0
Median Family Income - Raleigh-Cary, NC MSA	\$78,057	Median Housing Value				\$226,048
		Median Gross Rent				\$937
		Families Below Poverty Level				8.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data.                      Due to rounding, totals may not equal 100.0 percent.                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Raleigh MSA assessment area was 3.0 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were WakeMed Health & Hospitals, North Carolina State University, IBM Corporation, UNC Rex Healthcare, and SAS Institute Incorporated.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 37 FDIC-insured institutions operated 282 branches within this assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 14.3 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners conducted one community contact with a non-profit organization and referenced another community contact. One contact identified the need for short-term capital, specifically for small businesses. The other contact identified a need for affordable housing due to rising housing costs. Additionally, financial literacy was identified as a need.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.7 percent of the families are low- or moderate-income. The community contacts confirmed these needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE RALEIGH MSA ASSESSMENT AREA**

### **LENDING TEST**

Lending Test performance in the Raleigh MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was comparable to aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Raleigh MSA assessment area. The bank originated 185 community development loans totaling \$292.4 million. This amount represents 18.6 percent by number and 17.9 percent by dollar volume of total community development loans originated in North Carolina. Regarding the community development purpose, 16 loans supported affordable housing, 13 loans supported community services, 151 loans supported economic development, and 5 loans supported revitalization or stabilization. Examples of community development loans follow.

- 6 loans or lines-of-credit totaling \$94.4 million to a regional non-profit affordable housing organization or related equity fund to provide affordable housing for low- and moderate-income individuals.
- \$11.1 million construction loan to develop an age-restricted LIHTC apartment complex that provides 72 units of affordable housing for low- and moderate-income senior citizens.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Raleigh MSA assessment area. Qualified investments total \$120.0 million, or 2.1 percent, of bank-wide qualified investments which exceeds the percent of deposits of 1.8, and branches of 1.7 percent in this assessment area. Investments included 23 new investments for \$69.5 million, 12 prior-period investments for \$27.6 million, and 98 grants totaling \$22.9 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$20 million economic development grant for the creation of a new non-profit economic development subsidiary. The non-profit will work with other CDFIs and MDIs to help fund small business loans to underserved populations in low- and moderate-income census tracts in the assessment area.
- \$19.4 million in MBSs to renovate a 140-unit affordable multifamily housing project in the assessment area. Rents are restricted to no more than 30 percent of low-income tenant's income.
- \$10.0 million in LIHTCs to fund the construction of a 72-unit affordable multifamily housing project for senior citizens. The property is located in a moderate-income census tract and tenants are restricted to households earning less than 70 percent of the area median income.
- \$8.0 million in LIHTCs to fund the renovation of a 68-unit affordable multifamily housing project. The property is located in a low-income census tract and tenants are restricted to households earning less than 70 percent of the area median income.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. The branch distribution in low-income census tracts is significantly above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 11 low-income and 29 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	26	8.7	103,607	7.3	5	13.9	0	0.0	0	0.0
Moderate	67	22.4	297,180	21.0	4	11.1	1	50.0	1	5.6
Middle	103	34.4	517,865	36.6	14	38.9	0	0.0	8	44.4
Upper	95	31.8	470,170	33.3	11	30.6	0	0.0	9	50.0
NA	8	2.7	25,160	1.8	2	5.6	1	50.0	0	0.0
<b>Totals</b>	<b>299</b>	<b>100.0</b>	<b>1,413,982</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 2 and closed 18 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 190 community development services. This performance represents 15.1 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 16.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization with a mission to move low- and moderate-income families from homelessness to stable homes by providing mentoring, housing support, and community resources.
- A bank employee serves on the Board of a non-profit organization that provides microloans to small businesses.
- Several bank employees conducted financial literacy sessions for low- and moderate-income students.

## NC NON-MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NC NON-MSA ASSESSMENT AREA

The NC Non-MSA assessment area consists of 33 counties, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 65, or 28.9 percent, of its North Carolina branch offices in the NC Non-MSA assessment area. The assessment area also represents 15.5 percent of the rated-area loans by dollar volume, 19.1 percent of rated-area lending by number of loans, and 21.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that the majority of owner-occupied housing, small businesses, and small farms are within the middle-income census tracts. The remaining owner-occupied housing and small farms are at similar levels in the moderate- and upper-income census tracts. Low-income census tracts contain limited levels. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Although, the total population decreased to 1.6 million, the number of census tracts increased to 482. Regarding housing costs, the median housing value increased significantly to \$153,240, and the median gross rent increased to \$746. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the NC Non-MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	393	2.3	21.4	51.9	23.2	1.3
Population by Geography	1,628,724	1.6	21.4	56.3	20.7	0.0
Housing Units by Geography	807,792	1.4	19.4	54.3	24.9	0.0
Owner-Occupied Units by Geography	427,142	0.6	18.4	58.2	22.9	0.0
Occupied Rental Units by Geography	202,428	3.2	26.5	51.8	18.5	0.0
Vacant Units by Geography	178,222	1.3	13.9	48.0	36.8	0.0
Businesses by Geography	113,856	1.4	19.3	50.2	29.1	0.0
Farms by Geography	6,806	0.3	17.4	61.6	20.7	0.0
Family Distribution by Income Level	418,844	22.6	17.8	19.1	40.6	0.0
Household Distribution by Income Level	629,570	26.0	15.6	16.9	41.5	0.0
Median Family Income Non-MSAs - NC		\$47,217	Median Housing Value			\$137,003
			Median Gross Rent			\$681
			Families Below Poverty Level			16.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31,



2022, the unemployment ranged from 3.2 percent to 6.4 percent, with an overall average of 4.3 percent.

In 2022, according to D&B, the top industries were services, non-classifiable establishments, and retail trade. Information regarding top employers is not available.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 43 FDIC-insured institutions operated 374 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 28.6 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners conducted one community contact with an economic development organization and referenced another community contact. One contact indicated a need for affordable mortgage and small business loans. The contact also indicated the need for financial education. The other contact indicated a need for small business lending, specifically for the Hispanic community.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.4 percent of the families are low- or moderate-income. Community contacts confirmed these as credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NC NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the NC Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects a good distribution of lending among borrowers of different income levels and small businesses and farms of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic data but similar to aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

The geographic distribution of small farm loans reflects good penetration throughout the assessment area. The bank did not originate any small farm loans in low-income census tracts, which is consistent with demographic and aggregate lending data. Lending performance in moderate-income census tract was consistent with demographic data but slightly below aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. The bank's performance to low-income borrowers was below the percent of low-income families but similar to the aggregate lending data. In 2022, the bank's performance to low-income borrowers more than doubled to 7.8 percent. Lending to moderate-income borrowers was below demographic data but similar to aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

The borrower distribution of small farm loans reflects good penetration among farms of different sizes. Performance was below demographic data but above aggregate lending data. In 2022, performance decreased to 40.1 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the NC Non-MSA assessment area. The bank originated 167 community development loans totaling \$348.4 million. This amount represents 16.8 percent by number and 21.3 percent by dollar volume of total community development loans originated in North Carolina. Regarding the community development purpose, 13 loans supported affordable housing, 30 loans supported community services, 91 loans supported economic development, and 33 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$16.2 million loan to primarily fund installation of fiber optic cables, which provides high speed broadband internet to individuals and businesses throughout moderate-income, distressed, and underserved geographies.

- \$13.1 million loan for substantial renovations and classroom enhancements to an existing educational facility in an underserved geography. The school predominately serves low- and moderate-income students.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investment and grants in the NC Non-MSA assessment area. Qualified investments total \$132.5 million or 2.3 percent of bank-wide qualified investments, which exceeds the percent of deposits at 2.0 but is below the percent of branches at 3.1 in this assessment area. Investments included 26 new investments for \$87.6 million, 22 prior-period investments for \$42.7 million, and 96 grants totaling \$2.2 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$9.2 million in LIHTCs to fund the construction of an 80-unit affordable multifamily development. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$8.7 million in LIHTCs to finance a 64-unit affordable multifamily development. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$7.3 million in LIHTCs to finance a 60-unit affordable multifamily complex. The apartments are located in a distressed census tract and rents are restricted to persons making less than 70 percent of the area median income.
- \$7.1 million in LIHTCs to fund the construction of a 60-unit affordable multifamily development. The apartments are rent restricted to persons making less than 60 percent of the area median income.

## **SERVICE TEST**

Delivery systems are readily accessible to all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the institution's assessment area. The branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 5 low-income and 48 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery

systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	14	2.9	39,333	2.5	4	6.2	0	0.0	1	9.1
Moderate	97	20.1	307,653	19.6	17	26.2	2	100.0	5	45.5
Middle	245	50.8	810,291	51.5	29	44.6	0	0.0	4	36.4
Upper	114	23.7	396,377	25.2	12	18.5	0	0.0	1	9.1
NA	12	2.5	18,679	1.2	3	4.6	0	0.0	0	0.0
<b>Totals</b>	<b>482</b>	<b>100.0</b>	<b>1,572,333</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 2 and closed 11 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 398 community development services. This performance represents 31.6 percent of all activities in the state, which is higher than the assessment area’s share of state-wide branches at 28.9 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides academic enrichment opportunities for low- and moderate-income children, particularly ones who attend high-poverty and low-performing schools.
- A bank employee serves on the Board of an economic development organization that assists with the recruitment and retention of industrial businesses.
- Several bank employees provided financial literacy training for low- and moderate-income students that included banking basics and family budgeting.

## DURHAM MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DURHAM MSA ASSESSMENT AREA

The Durham MSA assessment area consists of all 5 counties within the Durham-Chapel Hill, NC MSA. The bank operates 19, or 8.4 percent, of its North Carolina branch offices in the Durham MSA assessment area. The assessment area also represents 13.2 percent of the rated-area loans by dollar volume, 11.0 percent of rated-area lending by number of loans, and 10.7 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 649,903, and the number of census tracts increased to 151. Regarding housing costs, the median housing value increased significantly to \$251,587, and the median gross rent increased to \$1,079. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Durham MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	121	9.9	26.4	28.1	31.4	4.1
Population by Geography	592,263	8.2	24.9	34.0	31.5	1.4
Housing Units by Geography	252,933	8.7	24.3	34.6	32.3	0.0
Owner-Occupied Units by Geography	140,069	3.0	19.7	38.5	38.8	0.0
Occupied Rental Units by Geography	90,315	16.6	29.3	28.9	25.0	0.1
Vacant Units by Geography	22,549	12.5	32.9	33.3	21.2	0.1
Businesses by Geography	60,573	6.8	18.6	33.6	39.7	1.4
Farms by Geography	1,992	2.9	20.5	50.2	26.4	0.1
Family Distribution by Income Level	142,399	22.6	16.5	17.8	43.0	0.0
Household Distribution by Income Level	230,384	24.2	15.1	17.0	43.7	0.0
Median Family Income - Durham-Chapel Hill, NC MSA	\$68,020		Median Housing Value			\$209,306
			Median Gross Rent			\$883
			Families Below Poverty Level			11.2%
<small>Source: 2015 ACS and 2021 D&amp;B Data.                      Due to rounding, totals may not equal 100.0 percent.                      (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Durham MSA assessment area was 3.0 percent.

In 2022, according to Moody’s Analytics, the top industries were education and health services, government, and professional and business services. The top employers were Duke University, Walmart Incorporated, IBM Corporation, IQVIA Research and Development Incorporated, and Cisco Systems.

### **Competition**

Competition in this assessment area is high. According to FDIC Deposit Market Share data as of June 30, 2022, 21 FDIC-insured institutions operated 111 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 16.9 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Durham MSA assessment area. A housing agency indicated a need for more philanthropic grants and affordable housing. Due to economic conditions, the price of land and homes has increased which creates a challenge to provide affordable housing. An economic development contact identified a need for technical assistance, specifically for small businesses. The contact indicated many small businesses do not have enough expertise to complete applications and respond effectively to economic changes without guidance.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.1 percent of the families are low- or moderate-income. The credit needs were commensurate with information from the community contacts.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DURHAM MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist’s Lending Test performance in the Durham MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area’s credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending performance in moderate-income census tracts was below demographic data but similar to aggregate lending data. In 2022, the bank's performance in moderate-income census tracts increased to 20.9 percent, which was consistent with demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Durham MSA assessment area. The bank originated 152 community development loans totaling \$131.3 million. This amount represents 15.3 percent by number and 8.0 percent by dollar volume of total community development loans originated in North Carolina. Regarding the community development purpose, 4 loans supported affordable housing, 14 loans supported community services, 130 loans supported economic development, and 4 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$15.0 million line of credit for a CDFI's non-profit loan fund, which provides financing to small businesses and developers that are underserved by traditional financial institutions.
- \$10.0 million construction loan to support the development of a LIHTC multifamily apartment complex with 82 units of affordable housing, including units designated for disabled and homeless individuals. This was a complex transaction that included a \$6.3 million LIHTC equity investment by Truist in addition to partnerships with the city and a housing development agency.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Durham MSA assessment area. Qualified investments total \$60.5 million, or 1.1 percent of bank-wide qualified investments, which exceeds the percent of deposits of 1.0 and the percent of branches at 0.9 in this assessment area. Investments included 27 new investments for \$42.7 million, 4 prior-period investments for \$14.4 million, and 84 grants totaling \$3.4 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$7.3 million in LIHTCs to finance a 51-unit affordable multifamily housing complex for senior citizens. The apartments are restricted to persons making less than 60 percent of the area median income.
- \$6.3 million in LIHTCs to fund the construction of an 82-unit affordable multifamily property. The apartments are restricted to persons making less than 80 percent of the area median income.
- \$6.0 million in LIHTCs to fund the construction of a 72-unit affordable multifamily complex. The apartments are located in a moderate-income census tract and restricted to persons making less than 60 percent of the area median income.
- \$4.7 million in MBSs to finance a 79-unit affordable multifamily housing property. The apartments are restricted to persons making less than 60 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. The branch distribution in low-income census tracts is below the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, the branches in middle- and upper-income census tracts serve approximately 10 low-income and 18 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	14	9.3	58,145	8.9	1	5.3	0	0.0	0	0.0
Moderate	37	24.5	158,963	24.5	5	26.3	0	0.0	5	33.3
Middle	45	29.8	207,758	32.0	6	31.6	0	0.0	5	33.3
Upper	49	32.5	212,271	32.7	7	36.8	0	0.0	5	33.3
NA	6	4.0	12,766	2.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>151</b>	<b>100.0</b>	<b>649,903</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 15 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 124 community development services. This performance represents 9.8 percent of all activities in the state, which is higher than the assessment area's share of state-wide branches at 8.4 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a housing coalition that works to improve the supply, quality, and access to affordable housing.
- A bank employee serves on the Board of a non-profit organization with a mission to eradicate poverty and increase social mobility for low- and moderate-income families.
- A bank employee serves on the Board of a healthcare provider that specializes in mental health, substance abuse, and parenting services for low- and moderate-income individuals.

## GREENSBORO MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREENSBORO MSA ASSESSMENT AREA

The Greensboro MSA assessment area consists of all 3 counties in the MSA. The bank operates 24, or 10.7 percent, of its North Carolina branch offices in the Greensboro MSA assessment area. The assessment area represents 9.2 percent of the rated-area loans by dollar volume, 9.8 percent of rated-area lending by number of loans, and 10.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels also in the moderate-income census tracts. Significantly lesser levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 776,566, and the number of census tracts increased to 182. Regarding housing costs, the median housing value increased significantly to \$156,645, and the median gross rent increased to \$849. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Greensboro Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	168	6.5	26.2	38.7	28.0	0.6
Population by Geography	741,433	5.7	23.3	42.8	28.1	0.0
Housing Units by Geography	326,899	5.7	23.7	42.9	27.6	0.0
Owner-Occupied Units by Geography	184,429	2.7	17.2	45.8	34.3	0.0
Occupied Rental Units by Geography	107,201	10.2	32.7	38.2	18.8	0.0
Vacant Units by Geography	35,269	8.2	30.5	42.1	19.2	0.0
Businesses by Geography	74,136	4.1	21.8	36.3	37.7	0.1
Farms by Geography	2,223	2.2	14.2	50.6	33.1	0.0
Family Distribution by Income Level	189,747	21.7	18.3	18.4	41.7	0.0
Household Distribution by Income Level	291,630	23.4	16.6	17.4	42.6	0.0
Median Family Income - Greensboro- High Point, NC MSA	\$55,218		Median Housing Value			\$145,143
			Median Gross Rent			\$747
			Families Below Poverty Level			13.3%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Greensboro MSA assessment area was 4.0 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, manufacturing, and professional and business services. The top employers were Cone Health, LabCorp Incorporated, The Volvo Group, United Healthcare, and University of North Carolina. Furthermore, in 2021, Toyota started construction on a battery plant, which will bring over 2,000 jobs to the assessment area.

### **Competition**

Competition in this assessment area is high. According to FDIC Deposit Market Share data as of June 30, 2022, 25 FDIC-insured institutions operated 148 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 24.2 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners conducted one community contact with an economic development organization within the Greensboro MSA assessment area. The contact identified a need for additional affordable housing units and small businesses, particularly minority-owned businesses.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.0 percent of the families are low- or moderate-income. The community contact also provided that small business and affordable housing loans are needed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREENSBORO MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Greensboro MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different incomes and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was below both demographic and aggregate lending data. However, in 2020, the bank's performance in moderate-income census tracts was consistent with aggregate lending data. In 2022, lending in moderate-income census tracts increased to 14.1 percent.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families but similar to the aggregate lending data. Lending to moderate-income borrowers was similar to both demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Greensboro MSA assessment area. The bank originated 139 community development loans totaling \$244.0 million. This amount represents 14.0 percent by number and 14.9 percent by dollar volume of total community development loans originated in North Carolina. Regarding the community development purpose, 10 loans supported affordable housing, 14 loans supported community services, 110 loans supported economic development, and 5 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$25.0 million loan to fund a municipal infrastructure project that is part of a community redevelopment and revitalization plan, which will help attract new and retain existing residents and businesses in low- and moderate-income geographies.
- \$9.3 million loan to develop a LIHTC multifamily property that provides 84 units of affordable housing for low- and moderate-income individuals.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Greensboro MSA assessment area. Qualified investments total \$80.4 million, or 1.4 percent of bank-wide qualified investments, which exceeds the percent of deposits at 1.0, and the percent of branches of 1.2 in this assessment area. Investments included 24 new investments for \$44.9 million, 11 prior-period investments for \$33.8 million, and 70 grants totaling \$1.7 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$7.6 million in MBSs to finance a 288-unit affordable multifamily housing complex. The apartments are located in a moderate-income census tract and restricted to persons making less than 60 percent of the area median income.
- \$4.7 million in LIHTCs for the renovation of a 50-unit affordable senior citizen assisted-living facility. All units are restricted to persons making less than 60 percent of the area median income.
- \$4.1 million in MBSs to finance a 72-unit affordable multifamily housing complex. The apartments are located in a moderate-income census tract and restricted to persons making less than 60 percent of the area median income.
- \$3.1 million in NMTCs in support of economic development in the assessment area. Funds will help in the redevelopment of a brownfield site, which is located in an Opportunity Zone. The redeveloped property will include multifamily rental units, which are restricted to less than 80 percent of the area median income.

### **SERVICE TEST**

Delivery systems are readily accessible to all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the institution's assessment area. The branch distribution in low-income census tracts is more than twice the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 7 low-income and 27 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	17	9.3	60,596	7.8	5	20.8	0	0.0	1	12.5
Moderate	44	24.2	166,909	21.5	4	16.7	0	0.0	2	25.0
Middle	67	36.8	313,571	40.4	8	33.3	0	0.0	1	12.5
Upper	51	28.0	229,294	29.5	7	29.2	0	0.0	4	50.0
NA	3	1.6	6,196	0.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>182</b>	<b>100.0</b>	<b>776,566</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed eight branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 146 community development services. This performance represents 11.6 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 10.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a housing coalition that advocates for affordable housing for low- and moderate-income individuals.
- Several bank employees provided financial awareness workshops for low- and moderate-income residents of a housing authority.
- Several bank employees provided technical assistance to small business owners to help them manage and grow their businesses.

## OTHER NORTH CAROLINA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the 11 North Carolina assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Winston-Salem MSA	Consistent	Consistent	Consistent
Asheville MSA	Consistent	Consistent	Below
Wilmington MSA	Consistent	Consistent	Below
Hickory MSA	Consistent	Consistent	Consistent
Fayetteville MSA	Consistent	Below	Consistent
Greenville MSA	Consistent	Consistent	Consistent
New Bern MSA	Consistent	Consistent	Below
Burlington MSA	Consistent	Consistent	Below
Goldsboro MSA	Consistent	Consistent	Consistent
Rocky Mount MSA	Below	Consistent	Consistent
Jacksonville MSA	Below	Below	Below

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exceptions of the Asheville MSA, Wilmington MSA, New Bern MSA, Burlington MSA, and Jacksonville MSA assessment areas, which are below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

### Winston-Salem MSA Assessment Area

The Winston-Salem MSA assessment area consists of Davidson, Davie, Forsyth, Stokes, and Yadkin Counties. Truist operates 20 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	5,420	\$473.5 million
Home Mortgage Loans	4,538	\$1.0 billion
Small Farm Loans	35	\$1.9 million
Community Development Loans	92	\$117.1 million
Investments (New)	21	\$44.6 million
Investments (Prior Period)	11	\$33.0 million
Donations	118	\$7.5 million
CD Services	110	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Winston-Salem MSA assessment area are in Appendix D.

### Asheville MSA Assessment Area

The Asheville MSA assessment area consists of Buncombe, Haywood, Henderson and Madison Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	2,826	\$209.2 million
Home Mortgage Loans	2,308	\$796.1 million
Small Farm Loans	14	\$948 thousand
Community Development Loans	39	\$53.4 million
Investments (New)	5	\$17.6 million
Investments (Prior Period)	2	\$8.9 million
Donations	20	\$3.0 million
CD Services	19	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Asheville MSA assessment area are in Appendix D.



## Wilmington MSA Assessment Area

The Wilmington MSA assessment area consists of New Hanover and Pender Counties. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	3,243	\$212.0 million
Home Mortgage Loans	2,082	\$774.1 million
Small Farm Loans	21	\$2.3 million
Community Development Loans	24	\$45.0 million
Investments (New)	5	\$24.6 million
Investments (Prior Period)	3	\$7.1 million
Donations	25	\$1.0 million
CD Services	27	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Wilmington MSA assessment area are in Appendix D.

## Hickory MSA Assessment Area

The Hickory MSA assessment area consists of Alexander, Burke, Caldwell, and Catawba Counties. Truist operates nine branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,626	\$210.4 million
Home Mortgage Loans	2,478	\$392.7 million
Small Farm Loans	14	\$301 thousand
Community Development Loans	52	\$72.8 million
Investments (New)	9	\$15.9 million
Investments (Prior Period)	5	\$14.0 million
Donations	18	\$99 thousand
CD Services	51	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Hickory MSA assessment area are in Appendix D.

### Fayetteville MSA Assessment Area

The Fayetteville MSA assessment area consists of Cumberland, Harnett, and Hoke Counties. Truist operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	3,466	\$201.4 million
Home Mortgage Loans	2,041	\$358.5 million
Small Farm Loans	39	\$3.0 million
Community Development Loans	47	\$18.0 million
Investments (New)	11	\$16.7 million
Investments (Prior Period)	0	\$0
Donations	15	\$335 thousand
CD Services	71	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Fayetteville MSA assessment area are in Appendix D.

### Greenville MSA Assessment Area

The Greenville MSA assessment area consists of Pitt County. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,291	\$120.0 million
Home Mortgage Loans	1,614	\$316.7 million
Small Farm Loans	10	\$1.1 million
Community Development Loans	19	\$28.0 million
Investments (New)	3	\$7.2 million
Investments (Prior Period)	2	\$4.2 million
Donations	11	\$204 thousand
CD Services	31	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Greenville MSA assessment area are in Appendix D.

### **New Bern MSA Assessment Area**

The New Bern MSA assessment area consists of Craven, Jones, and Pamlico Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,298	\$106.4 million
Home Mortgage Loans	874	\$166.9 million
Small Farm Loans	69	\$7.8 million
Community Development Loans	18	\$26.7 million
Investments (New)	1	\$5.2 million
Investments (Prior Period)	1	\$4.2 million
Donations	7	\$62 thousand
CD Services	9	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the New Bern MSA assessment area are in Appendix D.

### **Burlington MSA Assessment Area**

The Burlington MSA assessment area consists of Alamance County. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,038	\$86.1 million
Home Mortgage Loans	822	\$129.6 million
Small Farm Loans	13	\$742 thousand
Community Development Loans	17	\$24.6 million
Investments (New)	6	\$10.9 million
Investments (Prior Period)	0	\$0
Donations	12	\$132 thousand
CD Services	10	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Burlington MSA assessment area are in Appendix D.

### **Goldsboro MSA Assessment Area**

The Goldsboro MSA assessment area consists of Wayne County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	941	\$77.6 million
Home Mortgage Loans	641	\$94.6 million
Small Farm Loans	89	\$14.1 million
Community Development Loans	16	\$28.8 million
Investments (New)	3	\$8.0 million
Investments (Prior Period)	0	\$0
Donations	13	\$162 thousand
CD Services	11	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Goldsboro MSA assessment area are in Appendix D.

### **Rocky Mount MSA Assessment Area**

The Rocky Mount MSA assessment area consists of Edgecombe and Nash Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	869	\$82.9 million
Home Mortgage Loans	656	\$100.5 million
Small Farm Loans	23	\$2.6 million
Community Development Loans	6	\$10.6 million
Investments (New)	3	\$5.0 million
Investments (Prior Period)	1	\$2.6 million
Donations	5	\$30 thousand
CD Services	47	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Rocky Mount MSA assessment area are in Appendix D.

### **Jacksonville MSA Assessment Area**

The Jacksonville MSA assessment area consists of Onslow County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	652	\$36.0 million
Home Mortgage Loans	483	\$101.8 million
Small Farm Loans	7	\$1.2 million
Community Development Loans	5	\$5.6 million
Investments (New)	1	\$2.0 million
Investments (Prior Period)	0	\$0
Donations	2	\$14 thousand
CD Services	0	--
2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Jacksonville MSA assessment area are in Appendix D.

## GEORGIA

### CRA RATING FOR GEORGIA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

The evaluation of the Georgia performance considered the operations of Truist in 13 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 217, or 10.4 percent, of its total branch offices in Georgia. Georgia accounts for 15.8 percent of the bank-wide deposits, 10.4 percent of bank-wide loans by dollar volume, and 11.5 percent of bank-wide lending by number of loans. Overall, Truist ranks 1<sup>st</sup> in the state in deposit market share at 19.9 percent. Competitor institutions in the Georgia assessment areas include Bank of America, N.A., Wells Fargo Bank, N.A., and Synovus Bank.

### SCOPE OF EVALUATION – GEORGIA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Atlanta MSA and the GA Non-MSA assessment areas. Limited scope areas include the Albany, Athens, Augusta, Brunswick, Dalton, Gainesville, Macon, Rome, Savannah, Valdosta, and Warner-Robins MSA assessment areas. Home mortgage and small business loans constitute the primary loan types.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

#### LENDING TEST

The Lending Test is rated High Satisfactory for Georgia. Lending levels reflect good responsiveness to the Georgia assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Georgia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Georgia assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent good performance in both full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes for both assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels for both assessment areas.

### **Community Development Loans**

Truist is a leader in making community development loans in Georgia. During this evaluation period, the bank originated 700 community development loans totaling \$2.1 billion. This performance represents 9.8 percent by number and 12.9 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 156 community development loans totaling \$643.4 million were made.

Since the previous evaluation, Truist has originated 26 loans totaling \$62.6 million outside of the assessment areas but within Georgia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these loans follow.

- \$347,000 loan to refinance a 24-unit affordable multifamily apartment complex.
- \$398,000 loan to finance essential utility services in a small town comprised of three distressed middle-income census tracts.

Performance is consistent among the full-scope assessment areas. The analysis for each full-scope Georgia assessment area includes a detailed discussion of community development loans for that assessment area.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in Georgia. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance is consistent in each of the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Georgia. The bank provided 593 qualified investments for \$974.1 million. This represents 16.9 percent of bank-wide qualified investments, which exceeds the 10.4 percent of branches and 15.8 percent of deposits in the state. Of the total qualified investments, 168 were new investments for \$741.7 million, 62 were prior-period investments for \$192.4 million, and 363 were grants for \$40.0 million. The bulk of qualified investments in Georgia supports affordable housing.

On a state-wide level, the bank provided 10 grants for \$3.6 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Georgia. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test is rated Outstanding for Georgia. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. Performance in the full-scope assessment areas was consistent.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 217 branches in Georgia, which represents 10.4 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in Georgia.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	178	7.6	587,986	6.4	19	8.8	0	0.0	5	4.4
Moderate	565	24.1	2,224,449	24.2	52	24.0	0	0.0	21	18.6
Middle	806	34.4	3,294,463	35.8	72	33.2	0	0.0	34	30.1
Upper	713	30.4	2,896,962	31.5	66	30.4	1	100.0	49	43.4
NA	84	3.6	204,497	2.2	8	3.7	0	0.0	4	3.5
<b>Totals</b>	<b>2,346</b>	<b>100.0</b>	<b>9,208,357</b>	<b>100.0</b>	<b>217</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>113</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 1 and closed 113 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch



offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in Georgia. Bank records show that employees participated in 1,244 community development services since the last evaluation. This performance represents 9.6 percent of bank-wide activities, which is consistent with the state-wide share of branches at 10.4 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. Examples of community development services are provided under each full-scope assessment area; however, the following community development services benefited the entire state.

- A bank employee serves on the Board of a non-profit organization that provides healthcare services to low- and moderate-income individuals with addictive diseases.
- A bank employee serves on the Board of a non-profit organization that provides community service programs, including utility, rent, and food assistance.
- A bank employee serves on the Board of a non-profit organization that allocates resources to organizations and initiatives with the goal of reducing poverty.

The following table details the number of community development services by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Atlanta MSA	66	527	148	3	744
GA Non-MSA	11	133	4	1	149
Savannah MSA	27	48	9	0	84
Athens MSA	0	24	2	0	26
Augusta MSA	0	40	0	2	42
Gainesville MSA	0	51	0	0	51
Macon MSA	0	25	17	0	42
Dalton MSA	0	14	0	0	14
Warner-Robins MSA	0	18	6	0	24
Brunswick MSA	5	6	0	0	11
Rome MSA	4	15	0	0	19
Albany MSA	0	27	0	0	27
Valdosta MSA	0	8	0	0	8
State-wide Activities	0	3	0	0	3
<b>Total</b>	<b>113</b>	<b>939</b>	<b>186</b>	<b>6</b>	<b>1,244</b>

*Source: Bank Records*

## ATLANTA MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA MSA ASSESSMENT AREA

The Atlanta MSA assessment area consists of all 29 counties within the Atlanta-Sandy Springs-Alpharetta, GA MSA. The bank operates 140, or 64.5 percent, of its Georgia branch offices in the Atlanta MSA assessment area. The assessment area also represents 80.2 percent rated-area loans by dollar volume, 74.5 percent of rated-area lending by number of loans, and 82.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels in the moderate-income census tracts. The low-income census tracts contain significantly less owner-occupied housing units and businesses. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 6.1 million, and the number of census tracts increased to 1,500. Regarding housing costs, the median housing value increased significantly to \$250,950, and the median gross rent increased to \$1,216. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Atlanta Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	951	10.6	26.5	30.6	31.4	0.8
Population by Geography	5,535,837	7.4	26.2	34.3	31.8	0.3
Housing Units by Geography	2,202,308	8.3	26.9	33.0	31.7	0.1
Owner-Occupied Units by Geography	1,248,212	3.2	20.8	37.3	38.7	0.0
Occupied Rental Units by Geography	716,104	14.7	35.4	27.1	22.5	0.3
Vacant Units by Geography	237,992	15.8	33.1	28.6	22.4	0.1
Businesses by Geography	1,024,063	6.2	23.8	31.2	38.5	0.4
Farms by Geography	17,526	4.1	23.0	39.5	33.3	0.1
Family Distribution by Income Level	1,331,952	23.1	16.8	18.2	41.9	0.0
Household Distribution by Income Level	1,964,316	23.9	16.5	17.5	42.1	0.0
Median Family Income - Atlanta-Sandy Springs-Alpharetta, GA MSA	\$67,322	Median Housing Value				\$184,540
		Median Gross Rent				\$996
		Families Below Poverty Level				12.0%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Atlanta MSA assessment area was 2.9 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and government. The top employers were Delta Air Lines, Inc., Emory University and Emory Healthcare, The Home Depot, Inc., Northside Hospital, and Piedmont Healthcare.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 83 FDIC-insured institutions operated 1,066 branches within this area. Of these institutions, Truist ranked 1st in total deposits with a market share of 23.3 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Eight community contacts from organizations, such as economic development and housing agencies, were referenced within the Atlanta MSA assessment area. Several economic development organizations indicated a need for small business financing. Specifically, contacts identified financing needs for minority and women-owned businesses, as well as small business financial literacy. Contacts noted that housing prices have increased dramatically. Therefore, financial institutions could be doing more to finance affordable housing to include providing financial education.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. In particular, the need for affordable housing exists as 39.9 percent of the families are low- or moderate-income and housing prices have risen sharply. Additionally, the significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. The community contacts also provided that small business and affordable housing loans are credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ATLANTA MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the Atlanta MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was similar to demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was similar to demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families but similar to the aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 81.3 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Atlanta MSA assessment area. The bank originated 447 community development loans totaling \$1.6 billion. This amount represents 63.9 percent by number and 75.5 percent by dollar volume of total community development loans originated in Georgia. Regarding the community development purpose, 38 loans supported affordable housing, 32 loans supported community services, 271 loans supported economic development, and 106 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans totaling \$42.2 million to fund capital improvements and projects such as construction of new public safety facilities and renovations to a city park for residents in low- and moderate-income geographies.
- \$130.0 million participation loan for the purpose of recapitalizing a single-family mixed-use development and to build additional multifamily housing complexes and retail space, which is located in a moderate-income geography. The development will provide approximately 550 employment opportunities, many of which will benefit low- and moderate-income individuals.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Atlanta MSA assessment area. Qualified investments total \$789.0 million, or 13.7 percent, of bank-wide qualified investments which exceeds the percent of deposits at 13.1 and branches of 6.8, in this assessment area. Investments included 130 new investments for \$608.2 million, 34 prior-period investments for \$150.3 million, and 198 grants totaling \$30.5 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$32.1 million in a 150-unit affordable multifamily housing development for senior citizens. The investment was facilitated through the use of LIHTCs in partnership with a state government sponsored affordable loan consortium.
- \$20.0 million in a local SBIC that supports economic development by financing small businesses in the assessment area.
- \$13.6 million to support the rehabilitation of a 129-unit affordable senior citizen multifamily development in the assessment area through the use of LIHTCs. The rehabilitation will include certified energy efficient upgrades that will reduce tenant energy consumption by at least 15 percent.
- \$30.0 million in LIHTCs to support the rehabilitation and further development of a multi-use property located in downtown Atlanta. The project includes 170 units of multifamily housing (160 which are restricted as affordable with incomes between 30 to 80 percent of the area median income) and an expanded affordable health care clinic.
- \$39.6 million in LIHTCs for the permanent financing of a 244-unit affordable multifamily development in a moderate-income census tract in the assessment area. The project is 100 percent income restricted, with specific units set aside at 50, 60, and 70 percent of the area median income. Truist also provided the initial construction loan for the project.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. The branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, the branches in middle- and upper-income census tracts serve approximately 50 low-income and 107 moderate-income tracts. The ATM distribution is

consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	118	7.9	392,825	6.5	10	7.1	0	0.0	2	2.7
Moderate	367	24.5	1,529,139	25.1	34	24.3	0	0.0	13	17.6
Middle	472	31.5	2,025,467	33.3	41	29.3	0	0.0	19	25.7
Upper	489	32.6	2,003,292	32.9	51	36.4	1	100.0	38	51.4
NA	54	3.6	139,092	2.3	4	2.9	0	0.0	2	2.7
<b>Totals</b>	<b>1,500</b>	<b>100.0</b>	<b>6,089,815</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 1 and closed 74 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 744 community development services. This performance represents 59.8 percent of all activities in the state, which is consistent with the assessment area’s share of state-wide branches at 64.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization with a mission to improve the financial literacy of low- and moderate-income students.
- A bank employee serves on the Board of a non-profit organization that provides developmental activities and housing services for low- and moderate-income homeless youth.
- A bank employee serves on the Board of a non-profit economic development organization that provides support to microbusinesses.

## GA NON-MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GA NON-MSA ASSESSMENT AREA

The GA Non-MSA assessment area consists of 25 counties, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 25, or 11.5 percent, of its Georgia branches in the GA Non-MSA assessment area. The assessment area also represents 3.8 percent of the rated-area loans by dollar volume, 5.6 percent of rated-area lending by number of loans, and 2.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that the majority of owner-occupied housing units and businesses are within middle-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the bank’s assessment areas. The total population increased to 801,278, and the number of census tracts increased to 231. Regarding housing costs, the median housing value increased to \$138,299, and the median gross rent increased to \$734. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the GA Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	3.0	14.3	61.3	21.4	0.0
Population by Geography	779,874	3.0	14.3	60.8	21.9	0.0
Housing Units by Geography	348,250	2.5	13.7	60.9	22.9	0.0
Owner-Occupied Units by Geography	181,042	0.7	11.5	61.2	26.6	0.0
Occupied Rental Units by Geography	103,383	5.6	17.9	60.4	16.1	0.0
Vacant Units by Geography	63,825	2.3	13.4	61.1	23.2	0.0
Businesses by Geography	70,835	2.1	15.7	59.0	23.3	0.0
Farms by Geography	3,954	0.6	11.3	60.5	27.6	0.0
Family Distribution by Income Level	191,981	22.7	16.9	17.9	42.6	0.0
Household Distribution by Income Level	284,425	25.7	14.8	16.5	43.0	0.0
Median Family Income Non-MSAs – GA	\$45,886	Median Housing Value				\$114,393
		Median Gross Rent				\$673
		Families Below Poverty Level				18.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rates ranged from 2.4 percent to 5.0 percent, with an overall average of 3.4

percent. The average unemployment rate in the GA Non-MSA assessment area was above the state and National averages for all years under review.

In 2022, according to D&B data, the top industries were services, non-classifiable establishments, and retail trade. Information regarding top employers is not available.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 63 FDIC-insured institutions operated 193 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 10.2 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Nine community contacts from organizations, such as economic development and community service agencies, were referenced within the GA Non-MSA assessment area. Several economic development organizations indicated a significant opportunity for small business lending but more importantly financial literacy to sustain the business. Additionally, a few contacts noted a need for banks to be more personable and involved in the community through volunteerism. Also, contacts indicated the need for affordable housing and public transportation.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. In particular, the significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. In addition, there is a need for affordable housing as 39.6 percent of the families are low- or moderate-income. Information from the community contacts provided that small business and affordable housing loans are credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GA NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the GA Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.



### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was similar to demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic lending data but similar to aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was similar to demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below demographics and above the aggregate lending data. Lending to moderate-income borrowers was also below the demographic data but above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was slightly below demographic data and almost double aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the GA Non-MSA assessment area. The bank originated 45 community development loans totaling \$112.3 million. This amount represents 6.4 percent by number and 5.4 percent by dollar volume of total community development loans originated in Georgia. Regarding the community development purpose, 4 loans supported affordable housing, 4 loans supported community services, 21 loans supported economic development, and 16 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$38.8 million loan to fund extensive renovations to existing educational facilities and construct a new educational facility. The school district predominately serves low- and moderate-income students.
- \$3.5 million loan to help finance development of a commercial facility in a distressed geography with a high poverty rate of 22.9 percent. This new facility is expected to create 100 permanent jobs and retain 140 existing jobs, which includes jobs for low- and moderate-income persons. This was a complex transaction that also included 2 New Market Tax Credit equity investments totaling \$8.2 million by Truist and Truist Community Capital.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the GA Non-MSA assessment area. Qualified investments total \$28.5 million, or 0.5 percent, of bank-wide qualified investments, which exceeds the percent of deposits at 0.4 but is below the percent of branches of 1.2 in this assessment area. Investments included 6 new investments for \$20.3 million, 11 prior-period investments for \$7.5 million, and 27 grants totaling \$718,000. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$4.9 million in LIHTCs that supports the refinance and rehabilitation of 3 affordable multifamily developments in the assessment area. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$5.9 million NMTC investment to fund the construction and development of a new distribution facility in the assessment area. The facility is being built in a highly distressed area and will create 110 temporary construction jobs, 100 new full-time positions, and retain 140 full-time jobs, for low- and moderate-income staff.
- \$100,000 grant to a local non-profit organization that supports the homeless and families living below the poverty level in the assessment area. Programs include financial education to break the cycle of poverty and improve credits scores.
- \$375,000 grant to a non-profit organization that supports rural affordable housing in the assessment area. The grant will support, in part, a series of no-cost training and peer learning sessions designed to assist rural housing providers and non-profit organizations.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income tracts; however, less than 2.0 percent of the population resides in the respective tracts. The branch distribution in moderate-income census tracts is slightly below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 3 low-income and 10 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	4	1.7	14,126	1.8	0	0.0	0	0.0	0	0.0
Moderate	54	23.4	182,133	22.7	5	20.0	0	0.0	2	20.0
Middle	107	46.3	371,643	46.4	13	52.0	0	0.0	5	50.0
Upper	61	26.4	218,798	27.3	5	20.0	0	0.0	3	30.0
NA	5	2.2	14,578	1.8	2	8.0	0	0.0	0	0.0
<b>Totals</b>	<b>231</b>	<b>100.0</b>	<b>801,278</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 10 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 149 community development services. This performance represents 12.0 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 11.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that operates various programs, including homeless shelters and food pantries, for low-income veterans and senior citizens.
- A bank employee serves on the Board of a non-profit community service organization that provides housing for low- and moderate-income disabled and elderly individuals.
- A bank employee serves on the board of an economic development organization that oversees the implementation and administration of economic development programs, including neighborhood revitalization strategies.

## OTHER GEORGIA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the 11 Georgia assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Savannah MSA	Consistent	Consistent	Consistent
Augusta MSA	Consistent	Consistent	Consistent
Gainesville MSA	Consistent	Consistent	Consistent
Athens MSA	Consistent	Below	Consistent
Macon MSA	Consistent	Consistent	Consistent
Warner Robins MSA	Consistent	Consistent	Consistent
Dalton MSA	Consistent	Consistent	Consistent
Brunswick MSA	Consistent	Consistent	Consistent
Albany MSA	Consistent	Consistent	Consistent
Rome MSA	Consistent	Below	Consistent
Valdosta MSA	Consistent	Below	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

### Savannah MSA Assessment Area

The Savannah MSA assessment area consists of Bryan, Chatham, and Effingham Counties. Truist operates 11 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	2,041	\$154.2 million
Home Mortgage Loans	1,914	\$469.8 million
Small Farm Loans	6	\$461 thousand
Community Development Loans	72	\$156.8 million
Investments (New)	9	\$28.2 million
Investments (Prior Period)	4	\$4.1 million
Donations	36	\$881 thousand
CD Services	84	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Savannah MSA assessment area are in Appendix D.

### Augusta MSA Assessment Area

The Augusta MSA assessment area consists of Burke, Columbia, Lincoln, McDuffie, and Richmond Counties. Truist operates six branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	745	\$30.3 million
Home Mortgage Loans	1,899	\$418.0 million
Small Farm Loans	2	\$175 thousand
Community Development Loans	15	\$51.0 million
Investments (New)	7	\$31.0 million
Investments (Prior Period)	1	\$5.8 million
Donations	19	\$262 thousand
CD Services	42	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Augusta MSA assessment area are in Appendix D.

### **Gainesville MSA Assessment Area**

The Gainesville MSA assessment area consists of Hall County. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,490	\$65.5 million
Home Mortgage Loans	1,238	\$274.0 million
Small Farm Loans	3	\$307 thousand
Community Development Loans	15	\$23.9 million
Investments (New)	4	\$33.5 million
Investments (Prior Period)	1	\$697 thousand
Donations	5	\$68 thousand
CD Services	51	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Gainesville MSA assessment area are in Appendix D.

### **Athens MSA Assessment Area**

The Athens MSA assessment area consists of Clarke, Madison, Oconee, and Oglethorpe Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	845	\$38.4 million
Home Mortgage Loans	1,459	\$403.2 million
Small Farm Loans	0	\$0
Community Development Loans	11	\$22.2 million
Investments (New)	1	\$102 thousand
Investments (Prior Period)	0	\$0
Donations	10	\$1.1 million
CD Services	26	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Athens MSA assessment area are in Appendix D.

### **Macon MSA Assessment Area**

The Macon MSA assessment area consists of Bibb, Crawford, Jones, Monroe, and Twiggs Counties. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	1,166	\$72.3 million
Home Mortgage Loans	663	\$99.2 million
Small Farm Loans	8	\$672 thousand
Community Development Loans	25	\$17.4 million
Investments (New)	3	\$10.2 million
Investments (Prior Period)	4	\$2.5 million
Donations	17	\$744 thousand
CD Services	42	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Macon MSA assessment area are in Appendix D.

### **Warner Robins MSA Assessment Area**

The Warner Robins MSA assessment area consists of Houston and Peach Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	766	\$51.1 million
Home Mortgage Loans	652	\$165.3 million
Small Farm Loans	11	\$1.4 million
Community Development Loans	13	\$31.2 million
Investments (New)	2	\$5.0 million
Investments (Prior Period)	3	\$6.0 million
Donations	1	\$100 thousand
CD Services	24	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Warner Robins MSA assessment area are in Appendix D.

### Dalton MSA Assessment Area

The Dalton MSA assessment area consists of Murray and Whitfield Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	759	\$76.5 million
Home Mortgage Loans	474	\$66.7 million
Small Farm Loans	4	\$157 thousand
Community Development Loans	12	\$20.8 million
Investments (New)	1	\$1.2 million
Investments (Prior Period)	1	\$3.7 million
Donations	5	\$75 thousand
CD Services	14	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Dalton MSA assessment area are in Appendix D.

### Brunswick MSA Assessment Area

The Brunswick MSA assessment area consists of Brantley, Glynn, and McIntosh Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	488	\$22.0 million
Home Mortgage Loans	465	\$131.2 million
Small Farm Loans	3	\$321 thousand
Community Development Loans	8	\$4.6 million
Investments (New)	2	\$3.8 million
Investments (Prior Period)	2	\$4.1 million
Donations	14	\$177 thousand
CD Services	11	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Brunswick MSA assessment area are in Appendix D.



### Albany MSA Assessment Area

The Albany MSA assessment area consists of Dougherty, Lee, Terrell, and Worth Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	533	\$19.6 million
Home Mortgage Loans	341	\$41.0 million
Small Farm Loans	0	\$0
Community Development Loans	8	\$6.1 million
Investments (New)	2	\$100 thousand
Investments (Prior Period)	1	\$7.7 million
Donations	18	\$1.8 million
CD Services	27	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Albany MSA assessment area are in Appendix D.

### Rome MSA Assessment Area

The Rome MSA assessment area consists of Floyd County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	259	\$6.4 million
Home Mortgage Loans	352	\$48.6 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$1.2 million
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	1	\$25 thousand
CD Services	19	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Rome MSA assessment area are in Appendix D.

### Valdosta MSA Assessment Area

The Valdosta MSA assessment area consists of Brooks, Echols, Lanier, and Lowndes Counties. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	189	\$13.0 million
Home Mortgage Loans	140	\$23.3 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$1.4 million
Investments (New)	1	\$300 thousand
Investments (Prior Period)	0	\$0
Donations	2	\$8 thousand
CD Services	8	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Valdosta MSA assessment area are in Appendix D.

## VIRGINIA

### CRA RATING FOR VIRGINIA: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

The evaluation of the Virginia performance considered the operations of Truist in 10 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 184, or 8.8 percent, of its total branch offices in Virginia. Virginia accounts for 7.4 percent of the bank-wide deposits, 6.5 percent of loan by dollar volume, and 8.1 percent of lending by number of loans. Overall, Truist ranks 2<sup>nd</sup> in the state in deposit market share at 14.9 percent. Competitor institutions in the Virginia assessment areas include Capital One Bank USA, N.A., Bank of America, N.A., and Wells Fargo Bank, N.A.

### SCOPE OF EVALUATION – VIRGINIA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Richmond MSA, the Virginia Beach MSA, and the VA Non-MSA assessment areas. Limited scope areas included the Roanoke, Charlottesville, Lynchburg, Harrisonburg, Winchester, Staunton, and Blacksburg MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN VIRGINIA

#### LENDING TEST

The Lending Test is rated High Satisfactory for Virginia. Lending levels reflect good responsiveness to the Virginia assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects good distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Virginia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Virginia assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent good performance in each of the three full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes for each full-scope assessment area. The borrower distribution of home mortgage loans is good among borrowers of different income levels in all three full-scope assessment areas.

### **Community Development Loans**

Truist is a leader in making community development loans in Virginia. During this evaluation period, the bank originated 646 community development loans totaling \$1.0 billion. This performance represents 9.0 percent by number and 6.4 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 133 community development loans totaling \$467.9 million were made.

Since the previous evaluation, Truist has originated 4 loans totaling \$121.0 million, benefitting a broader state-wide area that includes the assessment areas. In addition, the bank originated 6 loans totaling \$2.7 million outside of the assessment areas but within Virginia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans were included. Examples of the loans benefitting the larger broader state-wide area follow.

- \$16.0 million loan to support the housing equity fund of a community development corporation whose mission is to provide, improve, and maintain affordable housing for low- and moderate-income individuals throughout Virginia.
- \$7.0 million loan for a CDFI whose mission is to create jobs, support housing and community development initiatives, and provide credit and financial services to individuals and businesses not served by traditional financial institutions.

Performance is consistent in the full-scope assessment areas. The analysis for each full-scope Virginia assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in Virginia. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Virginia. The bank provided 510 qualified investments for \$441.3 million. This represents 7.7 percent of bank-wide qualified investments, which is consistent with the 8.8 percent of branches and 7.4 percent of deposits in the

state. Of the total qualified investments, 136 were new investments for \$309.7 million, 51 were prior-period investments for \$121.6 million, and 323 were grants for \$9.9 million. The bulk of qualified investments in Virginia supports affordable housing.

On a state-wide level, the bank provided 6 grants for \$1.2 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Virginia. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test is rated Outstanding for Virginia. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leaders in providing community development services. Performance in the full-scope assessment areas was consistent.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 184 branches in Virginia, which represents 8.8 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The table below reflects the bank’s branch distribution by tract income level in Virginia.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	83	5.9	256,334	4.9	10	5.4	0	0.0	3	2.9
Moderate	316	22.4	1,104,620	21.0	36	19.6	0	0.0	19	18.6
Middle	614	43.6	2,390,773	45.4	90	48.9	1	50.0	48	47.1
Upper	355	25.2	1,462,650	27.8	48	26.1	1	50.0	29	28.4
NA	41	2.9	54,247	1.0	0	0.0	0	0.0	3	2.9
<b>Totals</b>	<b>1,409</b>	<b>100.0</b>	<b>5,268,624</b>	<b>100.0</b>	<b>184</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>102</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 2 and closed 102 branches

during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 1,148 community development services since the last evaluation. This performance represents 8.9 percent of bank-wide activities, which is consistent with the state-wide share of branches at 8.8 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. Examples of community development services are provided under each full-scope assessment area; however, Virginia had 5 community development services that benefitted the entire state. The following are examples of community development services that benefitted the entire state.

- A bank employee serves on the Board of a non-profit organization that provides free childcare and support services to low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides housing for homeless individuals and families.
- A bank employee serves on the Board of a non-profit organization that provides programs for low- and moderate-income youth.

The following table details the number of community development services by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Richmond MSA	7	308	10	0	325
Virginia Beach MSA	27	172	13	0	212
VA Non-MSA	0	254	6	0	260
Roanoke MSA	18	63	2	0	83
Charlottesville MSA	16	41	0	0	57
Lynchburg MSA	0	81	7	0	88
Harrisonburg MSA	0	50	4	0	54
Winchester MSA	0	26	2	0	28
Blacksburg MSA	1	13	0	0	14
Staunton MSA	3	6	13	0	22
State-wide Activities	0	5	0	0	5
<b>Total</b>	<b>72</b>	<b>1,019</b>	<b>57</b>	<b>0</b>	<b>1,148</b>

*Source: Bank Records*

## RICHMOND MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE RICHMOND MSA ASSESSMENT AREA

The Richmond MSA assessment area consists of all 17 counties and independent cities within the Richmond, VA MSA. The bank operates 44, or 23.9 percent, of its Virginia branch offices in the Richmond MSA assessment area. The assessment area also represents 33.8 percent of the rated-area loans by dollar volume, 31.1 percent of rated-area lending by number of loans, and 34.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased significantly to \$255,199, and the median gross rent increased to \$1,139. Additionally, median family income increased to \$91,165.

<b>Demographic Information for the Richmond MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	290	12.4	24.5	34.1	26.9	2.1
Population by Geography	1,223,972	8.9	22.5	37.6	30.3	0.8
Housing Units by Geography	506,425	9.7	23.9	37.0	29.1	0.4
Owner-Occupied Units by Geography	301,582	4.5	17.9	41.6	35.9	0.2
Occupied Rental Units by Geography	158,990	17.5	32.9	29.9	19.1	0.5
Vacant Units by Geography	45,853	16.5	31.8	31.2	19.4	1.1
Businesses by Geography	149,639	6.7	22.2	34.2	36.5	0.5
Farms by Geography	3,972	2.8	17.6	44.9	34.6	0.1
Family Distribution by Income Level	298,506	21.0	17.9	20.1	40.9	0.0
Household Distribution by Income Level	460,572	23.3	16.7	18.3	41.8	0.0
Median Family Income - Richmond, VA MSA		\$75,183	Median Housing Value			\$219,822
			Median Gross Rent			\$984
			Families Below Poverty Level			8.8%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Richmond MSA assessment area was 3.0 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Fort Lee, VCU Health System, HCA Inc., Bon Secours Richmond Health System, and Dominion Resources Inc.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 28 FDIC-insured institutions operated 268 branches within this area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 7.9 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from housing agencies were referenced within the Richmond MSA assessment area. Both contacts indicated that affordable housing is a critical need in the assessment area. One contact indicated that Richmond is mostly low- and moderate-income neighborhoods, with the exception of the northwest section. The demand for affordable housing, particularly rentals for households at or below area median income and starter homes, is very high. One contact indicated that there are currently 13,000 applicants waiting for housing opportunities. Housing stock is older and in disrepair which is why one contact indicated that demolition and rehabilitation is a top priority.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.0 percent of the families are low- or moderate-income. The community contacts also provided that affordable housing is a credit need.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE RICHMOND MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Richmond MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.



### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was slightly below demographic data but consistent with aggregate lending data. In 2022, performance in moderate-income census tracts increased to 20.7 percent, which was significantly higher than demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was significantly above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 78.5 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Richmond MSA assessment area. The bank originated 273 community development loans totaling \$424.3 million. This amount represents 42.3 percent by number and 41.3 percent by dollar volume of total community development loans originated in Virginia. Regarding the community development purpose, 14 loans supported affordable housing, 31 loans supported community services, 227 loans supported economic development, and 1 loan supported revitalization or stabilization. Examples of community development loans follow.

- \$73.5 million loan to support a multifamily apartment complex that provides 503 units of affordable housing for low- and moderate-income individuals.
- \$12.9 million loan to purchase and renovate a LIHTC multifamily apartment complex with 121 units, which are specifically for low-income individuals.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Richmond MSA assessment area. Qualified investments total \$171.3 million, or 3.0 percent, of bank-wide qualified investments which exceeds the percent of deposits at 2.6 and branches of 2.1 in this assessment area. Investments included 55 new investments for \$120.4 million, 16 prior-period investments for \$47.7 million, and 104 grants totaling \$3.2 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$21.0 million in LIHTCs to finance the new construction of a 216-unit affordable multifamily housing development. The property is located in a low-income census tract and is restricted to tenants earning less than 60 percent of the area median income.
- \$12.7 million in LIHTCs to provide financing for a 64-unit affordable multifamily housing development. All units are set aside for families earning from 30 to 80 percent of the area median income.
- \$12.6 million in LIHTCs for the renovation of a 216-unit affordable multifamily housing development. All units are set aside for families earning from 50 to 60 percent of the area median income.
- \$5.3 million in LIHTCs to finance the construction of a 98-unit affordable multifamily housing development. The property is located in a low-income census tract and all units are set aside for families earning less than 80 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 24 low-income and 38 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	34	10.2	103,093	7.8	5	11.4	0	0.0	2	7.7
Moderate	80	24.1	274,268	20.9	9	20.5	0	0.0	6	23.1
Middle	121	36.4	529,169	40.3	19	43.2	0	0.0	10	38.5
Upper	89	26.8	396,208	30.1	11	25.0	0	0.0	7	26.9
NA	8	2.4	11,696	0.9	0	0.0	0	0.0	1	3.8
<b>Totals</b>	<b>332</b>	<b>100.0</b>	<b>1,314,434</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 26 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 325 community development services. This performance represents 28.3 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 23.9 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that offers small dollar low interest loans to financially and credit challenged low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization with a mission to empower low-income parents to develop healthy, stable, nurturing environments for their children.
- A bank employee serves on the Board of a non-profit organization with a mission to build viable, thriving, and sustainable communities through the development of affordable housing.

## VIRGINIA BEACH MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE VIRGINIA BEACH MSA ASSESSMENT AREA

The Virginia Beach MSA assessment area consists of all 16 counties and independent cities within the Virginia Beach-Norfolk-Newport News, VA-NC MSA. The bank operates 40, or 21.7 percent, of its Virginia branch offices in the Virginia Beach MSA assessment area. The assessment area also represents 34.4 percent of the rated-area loans by dollar volume, 28.2 percent of rated-area lending by number of loans, and 26.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with a fair level within the moderate-income census tracts. The low-income census tracts contain significantly less levels. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.8 million, and the number of census tracts increased to 476. Regarding housing costs, the median housing value increased significantly to \$254,379, and the median gross rent increased to \$1,200. Additionally, median family income increased to \$83,421. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Virginia Beach MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	418	7.4	26.8	35.2	27.5	3.1
Population by Geography	1,697,529	5.8	26.5	35.7	31.6	0.4
Housing Units by Geography	692,799	5.9	26.5	36.2	31.1	0.4
Owner-Occupied Units by Geography	383,899	2.5	18.1	38.7	40.5	0.2
Occupied Rental Units by Geography	243,833	10.5	38.8	33.0	17.3	0.5
Vacant Units by Geography	65,067	8.4	29.5	34.2	26.9	1.0
Businesses by Geography	176,320	4.4	23.3	35.8	35.4	1.1
Farms by Geography	4,261	2.2	17.2	38.1	42.1	0.4
Family Distribution by Income Level	422,174	21.4	17.6	20.2	40.9	0.0
Household Distribution by Income Level	627,732	22.8	16.7	19.0	41.5	0.0
Median Family Income - Virginia Beach-Norfolk-Newport News, VA-NC MSA	\$69,773	Median Housing Value				\$235,946
		Median Gross Rent				\$1,092
		Families Below Poverty Level				9.6%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Virginia Beach MSA assessment area was 3.3 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were Naval Station Norfolk, Sentara Healthcare, Riverside Regional Medical Center, Bon Secours Health System Inc., and Old Dominion University.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 23 FDIC-insured institutions operated 248 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 24.3 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from organizations, an economic development organization and a non-profit housing organization, were referenced within the Virginia Beach MSA assessment area. The housing organization contact indicated a need for additional affordable housing. The contact stated that Department of Defense retirees, defense contractors with pensions, and remote workers that moved to the area during COVID has driven up home prices making them unaffordable for low- and moderate-income families. Additionally, the cost of building new homes is elevated due to the area's proximity to the coast as well as the risk of hurricanes. The housing organization indicated that there are community development opportunities in financial literacy, as well as bank accounts with low or no fees for low- and moderate-income individuals. The economic development contact indicated a need for small business financing, especially for working capital and business start-up loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.0 percent of the families are low- or moderate-income. Affordable housing and small business lending were also identified by the community contacts as credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE VIRGINIA BEACH- MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Virginia Beach MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution

among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, performance in moderate-income census tracts increased to 22.3 percent, which was significantly higher than demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was significantly above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Virginia Beach MSA assessment area. The bank originated 161 community development loans totaling \$201.3 million. This amount represents 24.9 percent by number and 19.6 percent by dollar volume of total community development loans originated in Virginia. Regarding the community development purpose, 21 loans supported affordable housing, 4 loans supported community services, 133 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans totaling \$19.3 million to facilitate the expansion of a small business that operates within an Enterprise Zone. The business expansion is expected to create 119 permanent jobs, including jobs for low- and moderate-income persons.
- \$9.8 million loan to finance a LIHTC multifamily property that provides 178 units of affordable housing for low- and moderate-income senior citizens.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Virginia Beach MSA assessment area. Qualified investments total \$118.3 million, or 2.1 percent of bank-wide qualified investments, which is consistent with the percent of deposits at 2.0 and the percent of branches of 2.0 in this assessment area. Investments included 36 new investments for \$94.7 million, 10 prior-period investments for \$21.4 million, and 75 grants totaling \$2.2 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$14.3 million in MBSs to finance a 300-unit affordable multifamily development. The property is located in a moderate-income census tract and tenancy is restricted to persons making less than 60 percent of the area median income.
- \$8.9 million in LIHTCs to fund the construction of an 88-unit affordable multifamily development. All units are set aside for households earning less than 60 percent of the area median income.
- \$8.0 million in LIHTCs to finance a 49-unit affordable multifamily development for low-income senior citizens. All units are set aside for households earning less than 80 percent of the area median income.
- \$6.5 million in LIHTCs to fund the construction of an 85-unit affordable multifamily development. All units are set aside for households earning less than 80 percent of the area median income, including 6 units reserved for the homeless and 21 units for households earning less than 40 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 22 low-income and 58 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	35	7.4	107,541	6.1	3	7.5	0	0.0	0	0.0
Moderate	121	25.4	428,258	24.5	7	17.5	0	0.0	7	21.2
Middle	162	34.0	633,572	36.2	15	37.5	0	0.0	11	33.3
Upper	139	29.2	559,706	32.0	15	37.5	1	100.0	13	39.4
NA	19	4.0	21,664	1.2	0	0.0	0	0.0	2	6.1
<b>Totals</b>	<b>476</b>	<b>100.0</b>	<b>1,750,741</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 1 and closed 33 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 212 community development services. This performance represents 18.5 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 21.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- Two bank employees serve on the Board of a non-profit organization that provides financial assistance to low- and moderate-income individuals and families.
- A bank employee serves on the Board of a non-profit organization that provides services to low- and moderate-income children, youth, and adults from underserved communities.
- A bank employee serves on the Board of a non-profit organization that provides workforce development, emergency services, and housing counseling to low- and moderate-income individuals and families.



## VA NON-MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE VA NON-MSA ASSESSMENT AREA

The VA Non-MSA assessment area consists of 37 counties and independent cities, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 46, or 25.0 percent, of its Virginia branch offices in the VA Non-MSA assessment area. The assessment area also represents 8.8 percent of the rated-area loans by dollar volume, 13.2 percent of rated-area lending by number of loans, and 9.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the majority of owner-occupied housing units and businesses are within middle-income census tracts. The remaining owner-occupied housing units are evenly distributed between moderate- and upper-income census tracts with a nominal level in the 2 low-income census tracts. For businesses, both moderate- and upper-income census tracts contain fair levels with a nominal level in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population decreased to 858,160, while the number of census tracts increased to 268. Regarding housing costs, the median housing value increased significantly to \$150,168, and the median gross rent increased to \$720. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the VA Non-MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	225	0.4	18.2	62.2	15.1	4.0
Population by Geography	874,779	0.4	16.8	64.4	18.1	0.2
Housing Units by Geography	438,410	0.4	17.0	64.7	17.8	0.0
Owner-Occupied Units by Geography	251,625	0.2	16.2	64.9	18.7	0.0
Occupied Rental Units by Geography	97,755	0.9	20.5	63.5	15.0	0.0
Vacant Units by Geography	89,030	0.5	15.3	65.7	18.6	0.0
Businesses by Geography	61,704	0.2	13.4	64.1	22.2	0.2
Farms by Geography	4,242	0.0	9.8	69.1	21.1	0.0
Family Distribution by Income Level	231,829	21.4	17.9	20.1	40.5	0.0
Household Distribution by Income Level	349,380	24.8	16.3	17.1	41.8	0.0
Median Family Income Non-MSAs - VA	\$51,647	Median Housing Value				\$135,760
		Median Gross Rent				\$659
		Families Below Poverty Level				13.1%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rates ranged from 2.4 percent to 4.7 percent, with an overall average of 3.4 percent. In 2022, according to D&B data, the top industries were services, non-classified establishments, and retail trade.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 49 FDIC-insured institutions operated 292 branches within this area. Of these institutions, Truist ranked 1st in total deposits with a market share of 15.9 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Five community contacts from organizations, such as economic development, housing, and community service agencies, were referenced within the VA Non-MSA assessment area. The contacts were primarily from the Shenandoah Valley (Shenandoah and Page Counties) and the eastern shore (Accomack and Northampton Counties). The Shenandoah Valley contacts indicated a need for additional affordable housing. One contact indicated a surplus of jobs but due to a lack of affordable housing it has been difficult to attract workers. Eastern shore contacts indicated that due to the area's location and geographical disadvantages, infrastructure and affordable housing are the most critical needs. Several contacts indicated community development opportunities in financial literacy, as well as in community services.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.3 percent of the families are low- or moderate-income. The community contacts also provided a significant need for affordable housing.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE VA NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the VA Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank did not originate any home mortgage loans in low-income census tracts. However, less than one percent of owner-occupied housing units are located in those tracts and aggregate lending was below one percent. Performance in moderate-income census tracts was below the demographic data but similar to the aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Small business lending in moderate-income census tracts was consistent with the demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 89.1 percent, which was above demographic data.

### **Community Development Loans**

Truist is a leader in making community development loans in the VA Non-MSA assessment area. The bank originated 60 community development loans totaling \$86.8 million. This amount represents 9.3 percent by number and 8.5 percent by dollar volume of total community development loans originated in Virginia. Regarding the community development purpose, 3 loans supported affordable housing, 10 loans supported community services, 39 loans supported economic development, and 8 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$7.5 million loan to build a new commercial facility in an industrial park of an underserved geography. This new facility will create additional employment opportunities for residents.
- \$25.1 million to fund improvements to existing educational facilities and construct a new educational facility. The schools benefitting from the improved facilities predominately serve low- and moderate-income students.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the VA Non-MSA assessment area. Qualified investments total \$58.5 million, or 1.0 percent of bank-wide qualified investments, which exceeds the percent of deposits at 0.7 but is below the percent of branches of 2.2 in this assessment area. Investments included 10 new investments for \$34.8 million, 11 prior-period investments for \$23.4 million, and 29 grants totaling \$331,000. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$6.6 million in LIHTCs to finance a 93-unit affordable multifamily housing development for low-income senior citizens and the disabled in the assessment area. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$4.7 million in LIHTCs to finance a 52-unit affordable multifamily housing development. The investment was made in partnership with a local CDFI and tenancy is restricted to those earning 60 percent or less of the area medium income.
- \$4.4 million in LIHTCs to finance a 56-unit affordable multifamily development. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$4.1 million in LIHTCs to finance a 49-unit affordable multifamily housing development. The apartments are rent restricted to persons making less than 60 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income tracts; however, less than 2 percent of the population resides in the respective tracts. The branch distribution in moderate-income census tracts is slightly below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 1 low-income and 30 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	4	1.5	10,923	1.3	0	0.0	0	0.0	1	7.7
Moderate	52	19.4	161,301	18.8	7	15.2	0	0.0	1	7.7
Middle	153	57.1	507,023	59.1	29	63.0	1	100.0	9	69.2
Upper	50	18.7	176,189	20.5	10	21.7	0	0.0	2	15.4
NA	9	3.4	2,724	0.3	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>268</b>	<b>100.0</b>	<b>858,160</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 1 and closed 13 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 260 community development services. This performance represents 22.7 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 25.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides workforce development workshops to low- and moderate-income individuals.
- Several bank employees conducted debt management workshops in conjunction with a non-profit organization that provides workforce development for low- and moderate-income individuals.
- Several bank employees provided financial literacy training that included developing a savings plan and family budgeting for low- and moderate-income individuals.

## OTHER VIRGINIA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
Roanoke MSA	Consistent	Below	Consistent
Charlottesville MSA	Consistent	Consistent	Consistent
Lynchburg MSA	Consistent	Consistent	Consistent
Harrisonburg MSA	Consistent	Below	Consistent
Winchester MSA	Consistent	Consistent	Consistent
Staunton MSA	Consistent	Consistent	Consistent
Blacksburg MSA	Consistent	Consistent	Below

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exception of the Blacksburg MSA assessment area. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### Roanoke MSA Assessment Area

The Roanoke MSA assessment area consists of all 6 counties and independent cities within the Roanoke, VA MSA. Truist operates 14 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,185	\$105.7 million
Home Mortgage Loans	2,361	\$386.8 million
Small Farm Loans	6	\$372 thousand
Community Development Loans	35	\$45.7 million
Investments (New)	8	\$4.7 million
Investments (Prior Period)	0	\$0
Donations	23	\$683 thousand
CD Services	83	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Roanoke MSA assessment area are in Appendix D.

### Charlottesville MSA Assessment Area

The Charlottesville MSA assessment area consists of all five counties and independent cities within the Charlottesville, VA MSA. Truist operates 11 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,227	\$105.4 million
Home Mortgage Loans	1,850	\$505.9 million
Small Farm Loans	17	\$1.4 million
Community Development Loans	46	\$50.2 million
Investments (New)	11	\$15.8 million
Investments (Prior Period)	3	\$8.3 million
Donations	20	\$481 thousand
CD Services	57	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Charlottesville MSA assessment area are in Appendix D.

### Lynchburg MSA Assessment Area

The Lynchburg MSA assessment area consists of all five counties and independent cities within the Lynchburg, VA MSA. Truist operates 12 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,746	\$98.4 million
Home Mortgage Loans	1,864	\$331.3 million
Small Farm Loans	21	\$709 thousand
Community Development Loans	14	\$16.7 million
Investments (New)	4	\$14.2 million
Investments (Prior Period)	4	\$9.6 million
Donations	26	\$576 thousand
CD Services	88	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Lynchburg MSA assessment area are in Appendix D.

### **Harrisonburg MSA Assessment Area**

The Harrisonburg MSA assessment area consists of both counties and independent cities within the Harrisonburg, VA MSA. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	681	\$35.2 million
Home Mortgage Loans	1,073	\$204.6 million
Small Farm Loans	5	\$501 thousand
Community Development Loans	11	\$12.6 million
Investments (New)	1	\$3.5 million
Investments (Prior Period)	0	\$0
Donations	12	\$174 thousand
CD Services	54	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Harrisonburg MSA assessment area are in Appendix D.

### **Winchester MSA Assessment Area**

The Winchester MSA assessment area consists of both counties and independent cities within the Winchester, VA MSA. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	811	\$53.6 million
Home Mortgage Loans	910	\$194.8 million
Small Farm Loans	9	\$822 thousand
Community Development Loans	19	\$34.0 million
Investments (New)	4	\$9.9 million
Investments (Prior Period)	0	\$0
Donations	11	\$243 thousand
CD Services	28	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Winchester MSA assessment area are in Appendix D.



### Staunton MSA Assessment Area

The Staunton MSA assessment area consists of all three counties and independent cities within the Staunton, VA MSA. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	563	\$28.1 million
Home Mortgage Loans	795	\$140.1 million
Small Farm Loans	9	\$1.5 million
Community Development Loans	8	\$2.2 million
Investments (New)	2	\$5.2 million
Investments (Prior Period)	3	\$5.8 million
Donations	7	\$83 thousand
CD Services	22	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Staunton MSA assessment area are in Appendix D.

### Blacksburg MSA Assessment Area

The Blacksburg MSA assessment area consists of all four counties and independent cities within the Blacksburg, VA MSA. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	526	\$27.6 million
Home Mortgage Loans	836	\$147.2 million
Small Farm Loans	2	\$30 thousand
Community Development Loans	9	\$28.9 million
Investments (New)	5	\$6.5 million
Investments (Prior Period)	4	\$5.4 million
Donations	10	\$669 thousand
CD Services	14	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Blacksburg MSA assessment area are in Appendix D.

## MARYLAND

### CRA RATING FOR MARYLAND: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MARYLAND

The evaluation of the Maryland performance considered the operations of Truist in 6 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 115, or 5.5 percent, of its total branch offices in Maryland. Maryland accounts for 4.3 percent of bank-wide deposits, 10.1 percent of bank-wide loans by dollar volume, and 6.8 percent of bank-wide lending by number of loans. Overall, Truist ranks 3<sup>rd</sup> in the state in deposit market share at 12.2 percent. Competitor institutions in the Maryland assessment areas include Bank of America, N.A., Manufacturers and Traders Trust Company, and PNC Bank, N.A.

### SCOPE OF EVALUATION – MARYLAND

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Baltimore MSA and Frederick MD assessment areas. Limited scope areas included the MD Non-MSA assessment area and the Salisbury, California, and Wilmington MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN MARYLAND

#### LENDING TEST

The Lending Test is rated Outstanding for Maryland. Lending levels reflect good responsiveness to the Maryland assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Maryland assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Maryland assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent good performance in both full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage and small business loans is excellent among both borrowers of different income levels and businesses of different sizes. Consistent excellent performance in both full-scope assessment areas supports the conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in Maryland. During this evaluation period, the bank originated 473 community development loans totaling \$805.0 million. This performance represents 6.6 percent by number and 5.0 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 77 community development loans totaling \$281.4 million were made. Performance was consistent in the full-scope assessment areas. The analysis for each full-scope assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding for Maryland. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Maryland. The bank provided 309 qualified investments for \$327.6 million. This represents 5.7 percent of bank-wide qualified investments, which exceeds the 5.5 percent of branches and 4.3 percent of deposits in the state. Of the total qualified investments, 39 were new investments for \$197.3 million, 24 were prior-period investments for \$122.2 million, and 246 were grants for \$8.1 million. The bulk of qualified investments in Maryland supports affordable housing.

On a state-wide level, the bank provided three grants for \$260,000 to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Maryland. Additional qualified investment information and examples are discussed under each full-scope assessment area benefitted.

## **SERVICE TEST**

The Service Test is rated Outstanding for Maryland. Delivery systems are accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally

not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was consistent.

**Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 115 branches in Maryland, which represents 5.5 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is below the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in Maryland.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	102	8.9	298,547	6.3	6	5.2	0	0.0	0	0.0
Moderate	255	22.2	1,043,367	22.1	30	26.1	2	50.0	14	21.9
Middle	440	38.3	1,913,530	40.5	46	40.0	0	0.0	23	35.9
Upper	323	28.1	1,429,590	30.2	33	28.7	2	50.0	27	42.2
NA	29	2.5	42,778	0.9	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>1,149</b>	<b>100.0</b>	<b>4,727,812</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 4 and closed 64 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in Maryland. Bank records show that employees participated in 717 community development services since the last evaluation. This performance represents 5.5 percent of bank-wide activities, which is consistent with the state-wide share of branches at 5.5 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent

responsiveness to the rated-area needs. The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Baltimore MSA	103	259	45	1	408
Frederick MD	8	187	31	0	226
MD Non-MSA	2	36	1	0	39
Salisbury MSA	1	22	2	0	25
California MSA	0	13	0	0	13
Wilmington MD	0	3	3	0	6
<b>Total</b>	<b>114</b>	<b>520</b>	<b>82</b>	<b>1</b>	<b>717</b>
Source: Bank Records					

## BALTIMORE MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BALTIMORE MSA ASSESSMENT AREA

The Baltimore MSA assessment area consists of all 7 counties within the Baltimore-Columbia-Towson, MD MSA. The bank operates 61, or 53.0 percent, of its Maryland branch offices in the Baltimore MSA assessment area. The assessment area also represents 50.0 percent of rated-area loans by dollar volume, 53.7 percent of rated-area lending by number of loans, and 61.9 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.8 million, and the number of census tracts increased to 717. Regarding housing costs, the median housing value increased to \$300,765, and the median gross rent increased to \$1,323. The number of businesses increased to 366,361.

<b>Demographic Information for the Baltimore MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	683	13.0	22.5	33.4	28.7	2.3
Population by Geography	2,769,818	9.0	22.0	35.3	32.8	0.8
Housing Units by Geography	1,145,512	10.7	22.9	35.5	30.6	0.3
Owner-Occupied Units by Geography	687,555	4.9	17.3	38.2	39.5	0.1
Occupied Rental Units by Geography	348,757	16.6	32.8	32.9	17.1	0.5
Vacant Units by Geography	109,200	28.2	26.7	26.7	17.6	0.8
Businesses by Geography	308,819	6.2	17.7	37.3	38.3	0.6
Farms by Geography	6,379	1.9	12.3	39.7	46.0	0.1
Family Distribution by Income Level	675,620	22.3	17.0	19.8	40.8	0.0
Household Distribution by Income Level	1,036,312	25.1	15.4	17.4	42.2	0.0
Median Family Income - Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$272,723
			Median Gross Rent			\$1,181
			Families Below Poverty Level			7.6%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Baltimore MSA assessment area was 4.0 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, professional and business services, and government. The top employers were Fort George G. Meade, Johns Hopkins University, Johns Hopkins Health System, University of Maryland Medical System, and Aberdeen Proving Ground.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 41 FDIC-insured institutions operated 566 branches within this area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 11.2 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from organizations were referenced within the Baltimore MSA assessment area. Contacts noted that housing prices continue to increase more quickly than income, and the housing gap is widening. Contacts noted a need for affordable housing, financial literacy education programs, and first-time homebuyer programs. Additionally, contacts noted a need for loans for working capital and equipment for small businesses.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.3 percent of the families are low- or moderate-income. Information from the two community contacts provided affordable housing and small business lending as credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BALTIMORE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Baltimore MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic data but was consistent with aggregate lending data. In 2022, performance in both low- and moderate-income census tracts was consistent with demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic data but consistent with aggregate lending data. In 2022, performance in moderate-income census tracts was consistent with demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, the performance exceeded aggregate lending data. In 2022, performance to low-income borrowers was similar to the percent of low-income families when families below the poverty level are considered. Lending to moderate-income borrowers significantly exceeded demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Baltimore MSA assessment area. The bank originated 247 community development loans totaling \$468.7 million. This amount represents 52.2 percent by number and 58.2 percent by dollar volume of total community development loans originated in Maryland. Regarding the community development purpose, 14 loans supported affordable housing, 22 loans supported community services, 210 loans supported economic development, and 1 loan supported revitalization or stabilization. Examples of community development loans follow.

- \$10.0 million loan to a CDFI's loan fund, which supports affordable housing initiatives to improve homeownership and rehabilitate properties for low- and moderate-income persons.
- \$11.9 million construction loan to support the development of a LIHTC multifamily apartment complex with 63 units of affordable housing, which was in partnership with a local housing development agency.



## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Baltimore MSA assessment area. Qualified investments total \$190.7 million, or 3.3 percent, of bank-wide qualified investments which exceeds the percent of deposits at 2.7 and branches of 2.9 in this assessment area. Investments included 28 new investments for \$105.1 million, 14 prior-period investments for \$78.9 million, and 185 grants totaling \$6.7 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$14.1 million in LIHTCs for the renovation of a 199-unit affordable multifamily housing development. The project is located in a low-income census tract and tenants are restricted to those earning 60 percent or below the area median income.
- \$14.1 million in LIHTCs for the construction of a 63-unit affordable multifamily housing development. The project is located in a low-income census tract and tenants are restricted to those earning 60 percent or below the area median income.
- \$10.0 million in LIHTCs for the renovation of a 144-unit affordable multifamily housing development. Tenants are restricted to those earning 60 percent or below the area median income.
- \$2.5 million in an SBIC that supports economic development by providing funding to small businesses in the assessment area.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is below the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 25 low-income and 42 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	80	11.2	202,921	7.1	2	3.3	0	0.0	0	0.0
Moderate	161	22.5	617,091	21.7	19	31.1	0	0.0	6	15.8
Middle	247	34.4	1,051,147	37.0	21	34.4	0	0.0	15	39.5
Upper	209	29.1	936,915	32.9	19	31.1	0	0.0	17	44.7
NA	20	2.8	36,436	1.3	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>717</b>	<b>100.0</b>	<b>2,844,510</b>	<b>100.0</b>	<b>61</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 38 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 408 community development services. This performance represents 56.9 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 53.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a healthcare foundation that provides access to healthcare prevention programs, including several free clinics, for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides strategically targeted mortgage services to underserved, low-income, and underinsured individuals and communities.
- A bank employee serves on the Board of a non-profit organization that provides hands-on work experiences for low- and moderate-income young adults.

## FREDERICK MD ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FREDERICK MD ASSESSMENT AREA

The Frederick MD assessment area consists of both counties within the Frederick-Gaithersburg-Rockville, MD MD. The bank operates 40, or 34.8 percent, of its Maryland branch offices in the Frederick MD assessment area. The assessment area also represents 44.7 percent of the rated-area loans by dollar volume, 39.0 percent of rated-area lending by number of loans, and 32.5 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels in the moderate-income census tracts. The low-income census tracts contain significantly less owner-occupied housing units and businesses. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.3 million, and the number of census tracts increased to 297. Regarding housing costs, the median housing value increased to \$486,787, and the median gross rent increased to \$1,755. The number of businesses increased to 183,346. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Frederick MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	276	6.9	23.6	36.6	32.6	0.4
Population by Geography	1,259,232	7.3	22.4	37.7	32.3	0.3
Housing Units by Geography	475,621	6.8	22.7	39.2	31.0	0.3
Owner-Occupied Units by Geography	307,081	3.2	17.9	40.4	38.5	0.1
Occupied Rental Units by Geography	146,648	14.1	32.3	36.9	16.1	0.6
Vacant Units by Geography	21,892	7.9	26.8	38.5	26.4	0.3
Businesses by Geography	158,021	4.9	21.2	36.3	37.5	0.1
Farms by Geography	3,196	4.2	23.0	43.3	29.5	0.0
Family Distribution by Income Level	317,031	21.7	17.1	20.8	40.5	0.0
Household Distribution by Income Level	453,729	22.9	17.1	18.7	41.3	0.0
Median Family Income - Frederick-Gaithersburg-Rockville, MD MD	\$112,655		Median Housing Value			\$441,782
			Median Gross Rent			\$1,613
			Families Below Poverty Level			4.6%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Frederick MD assessment area was 3.7 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were National Institutes of Health, Food and Drug Administration, Naval Support Activity Bethesda, Fort Detrick Campus, and Marriott International.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 31 FDIC-insured institutions operated 302 branches within this area. Of these institutions, Truist ranked 4<sup>th</sup> in total deposits with a market share of 9.5 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners performed one community contact interview with an economic development agency that operates within the Frederick MD assessment area. The contact stated the economy is strong within the assessment area, and the housing stock is stable despite the recent increase in interest rates. There has been a significant amount of new home inventory within the assessment area; however, entry-level and mid-level employees at companies have trouble affording a home. Therefore, the contact noted a need for affordable housing loans. In regards to small businesses, micro-businesses continue to struggle, and biotech companies who have less than 100 employees lack the investment opportunities that would allow for additional growth and expansion. The contact also noted a need for venture capital and working capital loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.8 percent of the families are low- or moderate-income. The community contact also provided that affordable housing and small business lending are needed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE FREDERICK MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Frederick MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2020, performance in moderate-income census tracts was above demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, performance in moderate-income census tracts was above demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, the bank's performance was similar to the aggregate lending data. In 2020, performance to low-income borrowers was above aggregate lending data. Lending to moderate-income borrowers significantly exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 81.7 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Frederick MD assessment area. The bank originated 207 community development loans totaling \$289.0 million. This amount represents 43.8 percent by number and 35.9 percent by dollar volume of total community development loans originated in Maryland. Regarding the community development purpose, 12 loans supported affordable housing, 3 loans supported community services, 190 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- four loans totaling \$32.9 million to finance 2 LIHTC developments. These developments include a 96-unit senior housing property and a 56-unit multifamily property for low- and moderate-income persons, including set-aside units for extremely low-income senior citizens and disabled individuals.
- \$24.9 million loan to build a new commercial facility in an industrial park located in a

moderate-income geography, which will help revitalize the area and create additional employment opportunities for residents.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Frederick MD assessment area. Qualified investments total \$109.8 million, or 1.9 percent of bank-wide qualified investments, which exceeds the percent of deposits of 1.4 and is consistent with the percent of branches at 1.9 in this assessment area. Investments included 7 new investments for \$86.4 million, 6 prior-period investments for \$22.4 million, and 40 grants totaling \$923,000. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$30.0 million in MBSs for the construction of a 200-unit affordable multifamily housing development. The apartments are rent restricted to persons making less than 65 percent of the area median income.
- \$14.3 million in LIHTCs to fund the construction and development of a 60-unit affordable multifamily housing development. The project is restricted to households earning less than 60 percent of the area median income.
- \$12.3 million in LIHTCs to fund the construction of a 152-unit affordable multifamily housing development. The project is restricted to households earning less than 60 percent of the area median income.
- \$9.6 million in LIHTCs to fund the renovation of an 87-unit affordable multifamily housing development. The project is restricted to households earning less than 60 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 9 low-income and 38 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative

delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	18	6.1	79,825	6.0	3	7.5	0	0.0	0	0.0
Moderate	74	24.9	336,882	25.3	10	25.0	2	50.0	7	36.8
Middle	112	37.7	508,761	38.1	16	40.0	0	0.0	4	21.1
Upper	92	31.0	405,427	30.4	11	27.5	2	50.0	8	42.1
NA	1	0.3	2,883	0.2	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>297</b>	<b>100.0</b>	<b>1,333,778</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened 4 and closed 19 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 226 community development services. This performance represents 31.5 percent of all activities in the state, which is consistent with the assessment area’s share of state-wide branches at 34.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a healthcare provider that primarily serves low-income individuals through mobile medical vans.
- A bank employee serves on a grant review committee that administers a closing cost assistance program for low- and moderate-income individuals and families.
- Several bank employees collaborated with a city government to provide financial assistance seminars on the value of using a checking account, how to establish credit, and developing a budget for low- and moderate-income individuals.

## OTHER MARYLAND ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
MD Non-MSA	Below	Below	Consistent
Salisbury MSA	Consistent	Consistent	Consistent
California MSA	Consistent	Consistent	Consistent
Wilmington MD	Below	Below	Below

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exception of the Wilmington MD assessment area which is below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### MD Non-MSA Assessment Area

The MD Non-MSA assessment area consists of Caroline, Dorchester, Garrett, Kent, and Talbot Counties. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	653	\$33.0 million
Home Mortgage Loans	918	\$258.4 million
Small Farm Loans	11	\$322 thousand
Community Development Loans	7	\$25.5 million
Investments (New)	1	\$601 thousand
Investments (Prior Period)	1	\$1.4 million
Donations	8	\$143 thousand
CD Services	39	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		



## Geographic Distribution and Borrower Profile

Tables containing lending data for the MD Non-MSA assessment area are in Appendix D.

### Salisbury MSA Assessment Area

The Salisbury MSA assessment area consists of Somerset, Wicomico, and Worcester Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	525	\$40.3 million
Home Mortgage Loans	862	\$201.3 million
Small Farm Loans	7	\$790 thousand
Community Development Loans	8	\$11.9 million
Investments (New)	2	\$5.1 million
Investments (Prior Period)	0	\$0
Donations	9	\$68 thousand
CD Services	25	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Salisbury MSA assessment area are in Appendix D.

### California MSA Assessment Area

The California MSA assessment area consists of St. Mary's County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	275	\$15.5 million
Home Mortgage Loans	640	\$174.5 million
Small Farm Loans	0	\$0
Community Development Loans	3	\$9.9 million
Investments (New)	1	\$105 thousand
Investments (Prior Period)	2	\$19.4 million
Donations	0	\$0
CD Services	13	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the California MSA assessment area are in Appendix D.

## Wilmington MD Assessment Area

The Wilmington MD assessment area consists of Cecil County. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	169	\$7.7 million
Home Mortgage Loans	226	\$53.0 million
Small Farm Loans	35	\$6.0 million
Community Development Loans	1	\$13 thousand
Investments (New)	0	\$0
Investments (Prior Period)	1	\$145 thousand
Donations	1	\$1 thousand
CD Services	6	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Wilmington MD assessment area are in Appendix D.

## TEXAS

### CRA RATING FOR TEXAS: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

The evaluation of the Texas performance considered the operations of Truist in 8 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 104, or 5.0 percent, of its total branch offices in Texas. Texas accounts for 1.9 percent of the bank-wide deposits, 8.3 percent of bank-wide loans by dollar volume, and 5.5 percent of bank-wide lending by number of loans. Overall, Truist ranks 22<sup>nd</sup> in the state in deposit market share at 0.5 percent. Competitor institutions in the Texas assessment areas include Charles Schwab Bank, SSB, JP Morgan Chase Bank, N.A, and Bank of America, N.A.

### SCOPE OF EVALUATION – TEXAS

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Dallas MD, Houston MSA, and Austin MSA assessment areas. Limited scope areas include the Fort Worth MD, San Antonio MSA, College Station MSA, Midland MSA, and Odessa MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXAS

#### LENDING TEST

The Lending Test is rated High Satisfactory for Texas. Lending levels reflect good responsiveness to the Texas assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects good distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Texas assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Texas assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of both home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent good performance in the three full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes for each of the three full-scope assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels within each full-scope assessment area.

### **Community Development Loans**

Truist is a leader in making community development loans in Texas. During this evaluation period, the bank originated 206 community development loans totaling \$1.0 billion. This performance represents 2.9 percent by number and 6.4 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 132 community development loans totaling \$552.9 million were made.

Since the previous evaluation, Truist has originated 2 loans totaling \$55.2 million, benefitting a broader state-wide area that includes the assessment areas. In addition, the bank originated 21 loans totaling \$60.8 million outside of the assessment areas but within Texas. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of the community loans in the broader state-wide area follow.

- \$3.0 million loan to a state-wide CDFI to invest capital in a program that provides flexible lending programs, business education, and technical assistance to minority-, women-, or veteran-owned small businesses or non-profit organizations.
- \$52.2 million loan to an entity for the purpose of refinancing debt associated with operating multiple skilled nursing facilities and financing the purchase of another nursing facility, all of which predominantly provide nursing home care and rehabilitative services to low- and moderate-income persons.

Performance is consistent in the full-scope assessment areas. The analysis for each full-scope Texas assessment area includes a detailed discussion of community development loans.

### **INVESTMENT TEST**

The Investment Test is rated Outstanding in Texas. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Texas. The bank provided 297 qualified investments for \$118.4 million. This represents 2.1 percent of bank-wide qualified investments, which is below the 5.0 percent of branches but exceeds the 1.9 percent of deposits in the state. Of the total qualified investments, 36 were new investments for \$79.4 million, 14 were prior-period investments for \$29.6 million, and 247 were grants for \$9.4 million. The bulk of qualified investments in Texas supports affordable housing.

On a state-wide level, the bank provided 4 grants for \$2.6 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Texas. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test is rated Outstanding for Texas. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 104 branches in Texas, which represents 5.0 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in Texas.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	449	10.1	1,721,489	8.5	9	8.7	1	25.0	0	0.0
Moderate	1,164	26.1	5,040,629	24.9	22	21.2	1	25.0	1	16.7
Middle	1,336	29.9	6,362,713	31.5	33	31.7	2	50.0	2	33.3
Upper	1,406	31.5	6,826,860	33.8	40	38.5	0	0.0	2	33.3
NA	107	2.4	258,089	1.3	0	0.0	0	0.0	1	16.7
<b>Totals</b>	<b>4,462</b>	<b>100.0</b>	<b>20,209,780</b>	<b>100.0</b>	<b>104</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened four and closed six branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in Texas. Bank records show that employees participated in 632 community development services since the last evaluation. This performance represents 4.9 percent of bank-wide activities, which is consistent with the state-wide share of branches at 5.0 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Dallas MD	20	152	55	0	227
Houston MSA	13	85	21	0	119
Austin MSA	0	65	29	1	95
Fort Worth MD	2	43	15	0	60
San Antonio MSA	4	50	13	1	68
College Station MSA	2	20	10	0	32
Midland MSA	0	9	3	0	12
Odessa MSA	0	9	10	0	19
<b>Total</b>	<b>41</b>	<b>433</b>	<b>156</b>	<b>2</b>	<b>632</b>

*Source: Bank Records*

## DALLAS MD ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DALLAS MD ASSESSMENT AREA

The Dallas MD assessment area consists of all 7 counties within the Dallas-Plano-Irving, TX MD. The bank operates 41, or 39.4 percent, of its Texas branch offices in the Dallas MD assessment area. The assessment area also represents 35.4 percent of the rated-area loans by dollar volume, 34.8 percent of rated-area lending by number of loans, and 31.6 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Limited levels of owner-occupied housing units and businesses are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 5.1 million, and the number of census tracts increased to 1,171. The number of businesses increased to 821,414. Regarding housing costs, the median housing value increased significantly to \$261,245, and the median gross rent increased to \$1,251. The poverty rate decreased to 8.2 percent. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Dallas MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	897	13.5	26.2	25.5	34.1	0.7
Population by Geography	4,519,004	11.8	26.1	27.4	34.5	0.2
Housing Units by Geography	1,721,065	12.5	24.5	27.8	34.9	0.3
Owner-Occupied Units by Geography	930,164	5.4	20.4	28.9	45.2	0.1
Occupied Rental Units by Geography	661,577	20.8	29.6	26.7	22.4	0.5
Vacant Units by Geography	129,324	21.6	27.8	25.7	24.5	0.4
Businesses by Geography	565,712	7.2	17.3	26.7	47.9	0.9
Farms by Geography	9,771	5.0	16.5	31.9	46.1	0.6
Family Distribution by Income Level	1,098,880	23.7	16.5	17.6	42.2	0.0
Household Distribution by Income Level	1,591,741	24.0	16.5	17.5	42.0	0.0
Median Family Income MSA - Dallas-Plano-Irving, TX MD	\$71,149	Median Housing Value				\$186,544
		Median Gross Rent				\$994
		Families Below Poverty Level				11.5%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in then Dallas MD assessment area was 3.5 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and government. The top employers were Walmart Inc., American Airlines, Baylor Scott & White Health, Lockheed Martin, and University of Texas Southwestern Medical Center.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 169 FDIC-insured institutions operated 1,578 branches within this area. Of these institutions, Truist ranked 18<sup>th</sup> in total deposits with a market share of 0.4 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from homeownership and economic development organizations were referenced within the Dallas MD assessment area. Both contacts noted a need for increased bank involvement with community development organizations, financial counseling, affordable housing, and small business lending. One contact noted that many individuals remain unbanked, and there is a need for bank programs to assist those individuals with banking services. Additionally, the same contact noted a need for more physical brick and mortar bank locations to increase bank access.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.2 percent of the families are low- or moderate-income. The community contact provided similar needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DALLAS MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Dallas MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment



area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was consistent with aggregate lending data but well below demographic data. However, in 2022 performance in moderate-income census tracts increased and was consistent with the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was consistent with aggregate lending data but above demographic lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 77.3 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Dallas MD assessment area. The bank originated 62 community development loans totaling \$304.9 million. This amount represents 30.1 percent by number and 29.5 percent by dollar volume of total community development loans originated in Texas. Regarding the community development purpose, 9 loans supported affordable housing, 3 loans supported community services, 48 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$21.0 million loan to develop a LIHTC multifamily apartment community that provides 276 units of affordable housing for low- and moderate-income individuals.
- \$880,000 loan to a non-profit organization that provides emergency housing, housing cost assistance, health care, counseling, job training, job placement, and assistance with securing stable housing for homeless and low-income individuals.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Dallas MD assessment area. Qualified investments total \$35.2 million, or 0.6 percent, of bank-wide qualified investments which is consistent with the percent of deposits if 0.6 but is below the percent of branches at 2.0 in this assessment area. Investments included 8 new investments for \$24.5 million, 4 prior-period investments for \$8.5 million, and 88 grants totaling \$2.2 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$11.7 million in LIHTCs for the construction of a 106-unit affordable multifamily housing development. Tenants are restricted to those earning 60 percent or less of the area median income.
- \$5.0 million equity investment for the construction of a 276-unit affordable multifamily development. The project is 100 percent restricted to households earning 60 percent or less of the area median income.
- \$3.3 million in MBSs to finance a 36-unit affordable multifamily housing development. Tenancy is restricted to those earning 50 percent or less of the area median income.
- \$2.7 million in NMTCs that support revitalization and stabilization through the construction of a new recycling facility in a highly distressed moderate-income census tract. The project will create 105 jobs; 75% of the jobs will be filled by individuals from low-income communities.

## **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 22 low-income and 36 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	118	10.1	501,363	9.8	4	9.8	0	0.0	0	0.0
Moderate	294	25.1	1,263,640	24.6	6	14.6	0	0.0	0	0.0
Middle	338	28.9	1,505,976	29.4	16	39.0	2	100.0	1	100.0
Upper	402	34.3	1,810,480	35.3	15	36.6	0	0.0	0	0.0
NA	19	1.6	48,507	0.9	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>1,171</b>	<b>100.0</b>	<b>5,129,966</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in a middle-income census tract during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 227 community development services. This performance represents 35.9 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 39.4 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides housing for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides emergency housing and job search assistance for low- and moderate-income individuals.
- A bank employee serves on the Board of a non-profit organization that provides rent and food assistance for low- and moderate-income families.

## HOUSTON MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HOUSTON MSA ASSESSMENT AREA

The Houston MSA assessment area consists of all 9 counties within the Houston-The Woodlands-Sugar Land, TX MSA. The bank operates 21, or 20.2 percent, of its Texas branch offices in the Houston MSA assessment area. The assessment area also represents 23.9 percent of the rated-area loans by dollar volume, 24.6 percent of rated-area lending by number of loans, and 34.4 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the largest level of owner-occupied housing units and businesses are within upper-income census tracts with the levels in the moderate- and middle-income census tracts relatively comparable. Low-income census tracts contain limited levels. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 7.1 million, and the number of census tracts increased to 1,606. The total number of businesses increased to 1,023,984. Regarding housing costs, the median housing value increased significantly to \$228,998, and the median gross rent increased to \$1,170. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Houston MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	676,071	9.1	17.8	23.1	49.7	0.2
Farms by Geography	10,422	5.1	16.2	30.4	48.2	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income - Houston-The Woodlands-Sugar Land, TX MSA	\$69,373	Median Housing Value				\$172,974
		Median Gross Rent				\$972
		Families Below Poverty Level				12.8%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Houston MSA assessment area was 4.2 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business, government, and leisure and hospitality services. The top employers were Exxon Mobil Corporation, Wood, Landry's Inc., Shell Oil Company, and Fort Bend Independent School District.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 97 FDIC-insured institutions operated 1,371 branches within this area. Of these institutions, Truist ranked 15<sup>th</sup> in total deposits with a market share of 0.8 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Three community contacts from economic development organizations and an insurance agent were referenced within the Houston MSA assessment area. All the contacts noted a need for small business and affordable mortgage loans. One contact noted affordable housing stock is essentially non-existent and the average single family home is priced high.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.5 percent of the families are low- or moderate-income. The community contacts confirmed affordable housing and small business loans as credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HOUSTON MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Houston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was above both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with demographic and aggregate lending data. However, in 2022 performance to moderate-income borrowers increased and was above the demographic data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Houston MSA assessment area. The bank originated 42 community development loans totaling \$162.9 million. This amount represents 20.4 percent by number and 15.8 percent by dollar volume of total community development loans originated in Texas. Regarding the community development purpose, 7 loans supported affordable housing, 1 loan supported community services, 32 loans supported economic development, and 2 loans supported revitalization or stabilization. Example of community development loans follow.

- \$24.4 million loan to develop a multifamily apartment building with 147 units of affordable housing for low- and moderate-income individuals.
- two loans totaling \$7.3 million to provide funding for a new daycare facility through the SBA 504 loan program, which will create 30 permanent jobs to include employment opportunities for low- and moderate-income persons.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Houston MSA assessment area. Qualified investments total \$38.6 million, or 0.7 percent of bank-wide qualified investments, which is consistent with the percent of deposits of 0.7 but below the percent of branches at 1.0 in this assessment area. Investments included 6 new investments for \$26.3 million, 5 prior-period investments for \$10.4 million, and 49 grants totaling \$1.9 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$9.4 million in LIHTCs for the renovation of a 172-unit affordable multifamily housing development. The project is located in a low-income census tract and is being developed in partnership with an affordable housing agency.
- \$8.8 million in MBSs to finance a 249-unit affordable multifamily housing development. The project is located in a low-income census tract and tenancy is restricted to those earning 60 percent or less of the area median income.
- \$5.0 million in LIHTCs to finance a 272-unit affordable multifamily housing development. The property is located in a moderate-income census tract and tenancy is restricted to low- and moderate-income households.
- \$2.4 million in MBSs to finance a 240-unit affordable multifamily housing development. Tenancy is restricted to those earning 80 percent or less of the area median income.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has improved accessibility of its delivery systems, particularly in low-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 13 low-income and 14 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	216	13.4	751,022	10.5	2	9.5	1	100.0	0	0.0
Moderate	402	25.0	1,705,110	23.9	6	28.6	0	0.0	0	0.0
Middle	426	26.5	2,050,879	28.8	7	33.3	0	0.0	0	0.0
Upper	510	31.8	2,497,794	35.1	6	28.6	0	0.0	1	50.0
NA	52	3.2	117,435	1.6	0	0.0	0	0.0	1	50.0
<b>Totals</b>	<b>1,606</b>	<b>100.0</b>	<b>7,122,240</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has improved the accessibility of its delivery systems. As shown in the table above, the bank opened one branch in a low-income census tract. No branches were closed in the low- or moderate-income census tracts.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 119 community development services. This performance represents 18.8 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 20.2 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that operates housing facilities for low-income and homeless families.
- A bank employee serves on the Board of a non-profit organization that provides social and financial education services for low- and moderate-income individuals and families.
- A bank employee serves on the Board of a non-profit organization that provides workforce development and small business development assistance for low- and moderate-income individuals.



## AUSTIN MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE AUSTIN MSA ASSESSMENT AREA

The Austin MSA assessment area consists of all 5 counties within the Austin-Round Rock-Georgetown, TX MSA. The bank operates 13, or 12.5 percent, of its Texas branch offices in the Austin MSA assessment area. The assessment area also represents 18.5 percent of the rated-area loans by dollar volume, 14.7 percent of rated-area lending by number of loans, and 7.9 percent of the rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels within the moderate-income census tracts. Levels in the low-income census tracts are limited. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.3 million, and the number of census tracts increased to 503. The number of businesses increased to 437,528. Regarding housing costs, the median housing value increased significantly to \$333,862, and the median gross rent increased to \$1,342. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Austin MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	350	10.6	22.3	36.6	28.9	1.7
Population by Geography	1,889,094	10.1	22.3	37.3	29.2	1.1
Housing Units by Geography	747,159	10.1	20.6	38.2	30.1	0.9
Owner-Occupied Units by Geography	399,483	3.8	18.1	40.3	37.6	0.2
Occupied Rental Units by Geography	289,795	18.4	23.8	35.5	20.5	1.7
Vacant Units by Geography	57,881	12.0	22.1	37.9	26.6	1.5
Businesses by Geography	256,163	6.2	13.0	34.0	45.6	1.2
Farms by Geography	5,288	4.5	16.3	39.4	39.4	0.4
Family Distribution by Income Level	428,451	22.5	16.9	19.8	40.8	0.0
Household Distribution by Income Level	689,278	23.6	16.6	18.0	41.7	0.0
Median Family Income - Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$233,705
			Median Gross Rent			\$1,067
			Families Below Poverty Level			9.5%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Austin MSA was 2.9 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were the State of Texas, University of Texas at Austin, H-E-B, Dell Technologies, and City of Austin.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 70 FDIC-insured institutions operated 439 branches within this area. Of these institutions, Truist ranked 17<sup>th</sup> in total deposits with a market share of 0.9 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from an organization that provides technical assistance and economic planning to local governments was referenced within the Austin MSA assessment area. The contact noted a need for small business and affordable mortgage loans. The contact noted that housing prices are extremely high.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.4 percent of the families are low- or moderate-income. The contact confirmed the credit needs are small business and affordable mortgage loans.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE AUSTIN- MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Austin MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was consistent with demographic lending data but above aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with demographic lending data but above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 82.2 percent

### **Community Development Loans**

Truist is a leader in making community development loans in the Austin MSA assessment area. The bank originated 30 community development loans totaling \$143.2 million. This amount represents 14.6 percent by number and 13.8 percent by dollar volume of total community development loans originated in Texas. Regarding the community development purpose, 3 loans supported affordable housing, 3 loans supported community services, and 24 loans supported economic development. Examples of community development loans follow.

- two loans totaling \$4.1 million to provide funding for a new daycare facility that will create permanent jobs, including employment opportunities for low- and moderate-income persons. These loans were originated in partnership with a local certified development company, including use of the SBA 504 loan program.
- two loans totaling \$25.2 million to refinance a multifamily apartment complex that provides 199 set-aside units of affordable housing for low- and moderate-income individuals.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Austin MSA assessment area. Qualified investments total \$13.7 million, or 0.2 percent of bank-wide qualified investments, which is consistent with the percent of deposits of 0.2 but is below the percent of branches at 0.7 in this assessment area. Investments included 2 new investments for \$8.0 million, 1 prior-period investments for \$4.1 million, and 34 grants totaling \$1.6 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$6.5 million in LIHTCs to finance the construction of a 116-unit affordable multifamily housing development in the assessment area. Tenancy is restricted to households earning 60 percent or below the area median income.
- \$1.5 million investment in an SBIC that supports economic development by funding small businesses in the assessment area.
- \$750,000 grant to a local CDFI. The grant supports economic development by providing technical assistance and funding to small businesses.
- \$250,000 grant to a foundation that supports economic development. Funds will be used to provide business technical assistance and other training and support services as part of a small business incubator.

### **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 10 low-income and 15 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	33	6.6	142,749	6.3	1	7.7	0	0.0	0	0.0
Moderate	128	25.4	561,297	24.6	2	15.4	1	100.0	1	100.0
Middle	175	34.8	829,461	36.3	3	23.1	0	0.0	0	0.0
Upper	149	29.6	695,464	30.5	7	53.8	0	0.0	0	0.0
NA	18	3.6	54,400	2.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>503</b>	<b>100.0</b>	<b>2,283,371</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened one and closed one branch during the evaluation period. The closure resulted from branch a consolidation to address the redundancy in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branch, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 95 community development services. This performance represents 15.0 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 12.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization with a mission to increase the preparedness, participation, and success of post-secondary education for low- and moderate-income students.
- A bank employee serves on the Board of a non-profit community development association with a mission to improve the quality of life for low- and moderate-income individuals by generating resources and relationships that enhance and sustain their communities.
- A bank employee serves on the Board of a business incubator that provides training, coaching, and support to underserved small businesses.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
Fort Worth MD	Consistent	Consistent	Consistent
San Antonio MSA	Consistent	Consistent	Consistent
College Station MSA	Consistent	Below	Consistent
Midland MSA	Consistent	Consistent	Consistent
Odessa MSA	Consistent	Consistent	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### Fort Worth MD Assessment Area

The Fort Worth MD assessment area consists of Johnson, Parker, Tarrant, and Wise Counties. Truist operates ten branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	2,550	\$167.4 million
Home Mortgage Loans	4,059	\$1.5 billion
Small Farm Loans	2	\$190 thousand
Community Development Loans	13	\$42.7 million
Investments (New)	9	\$5.3 million
Investments (Prior Period)	3	\$4.9 million
Donations	21	\$403 thousand
CD Services	60	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Fort Worth MD assessment area are in Appendix D.

#### San Antonio MSA Assessment Area

The San Antonio MSA assessment area consists of Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson Counties. Truist operates nine branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,683	\$96.6 million
Home Mortgage Loans	1,153	\$807.3 million
Small Farm Loans	1	\$19 thousand
Community Development Loans	25	\$238.8 million
Investments (New)	5	\$9.5 million
Investments (Prior Period)	1	\$1.6 million
Donations	31	\$508 thousand
CD Services	68	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the San Antonio MD assessment area are in Appendix D.

#### College Station MSA Assessment Area

The College Station MSA assessment area consists of Brazos, Burleson, and Robertson Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	740	\$54.0 million
Home Mortgage Loans	523	\$152.4 million
Small Farm Loans	1	\$10 thousand
Community Development Loans	6	\$22.6 million
Investments (New)	3	\$2.5 million
Investments (Prior Period)	0	\$0
Donations	11	\$100 thousand
CD Services	32	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the College Station MSA assessment area are in Appendix D.

### Midland MSA Assessment Area

The Midland MSA assessment area consists of Martin and Midland Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	211	\$8.9 million
Home Mortgage Loans	329	\$110.6 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$1.1 million
Investments (New)	2	\$2.9 million
Investments (Prior Period)	0	\$0
Donations	3	\$30 thousand
CD Services	12	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Midland MSA assessment area are in Appendix D.

### Odessa MSA Assessment Area

The Odessa MSA assessment area consists of Ector County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	211	\$7.0 million
Home Mortgage Loans	88	\$16.5 million
Small Farm Loans	1	\$4 thousand
Community Development Loans	3	\$1.7 million
Investments (New)	1	\$499 thousand
Investments (Prior Period)	0	\$0
Donations	6	\$42 thousand
CD Services	19	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Odessa MSA assessment area are in Appendix D.



## PENNSYLVANIA

### CRA RATING FOR PENNSYLVANIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN PENNSYLVANIA

The evaluation of the Pennsylvania performance considered the operations of Truist in 15 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 153, or 7.3 percent, of its total branch offices in Pennsylvania. Pennsylvania accounts for 3.6 percent of the bank-wide deposits, 4.2 percent of loans by dollar volume, and 4.3 percent of lending by number of loans. Overall, Truist ranks 9<sup>th</sup> in the state in deposit market share at 2.7 percent. Competitor institutions in the Pennsylvania assessment areas include PNC Bank, N.A., Wells Fargo Bank, N.A., and Citizens Bank, N.A.

### SCOPE OF EVALUATION – PENNSYLVANIA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Montgomery County MD, Lancaster MSA, Allentown MSA, and the Philadelphia MD assessment areas. Limited scope areas include the Reading MSA, York MSA, Harrisburg MSA, PA Non-MSA, Chambersburg MSA, Scranton MSA, Gettysburg MSA, Lebanon MSA, Williamsport MSA, State College MSA, and East Stroudsburg MSA assessment areas. Based on the number of loans, small farm loans were reviewed in the Montgomery County MD and Lancaster MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN PENNSYLVANIA

#### LENDING TEST

The Lending Test is rated High Satisfactory for Pennsylvania. Lending levels reflect good responsiveness to the Pennsylvania assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses and farms of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Overall performance is consistent in the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Pennsylvania assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Pennsylvania assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage and small business loans reflects consistent good penetration throughout the assessment areas. Performance for small farm loans was not consistent in the two assessment areas where small farm loans were reviewed. The geographic distribution of small farm loans is excellent in the Montgomery County MD assessment area and adequate in the Lancaster MSA assessment area.

### **Borrower Profile**

The overall borrower distribution of home mortgage, small business, and small farm loans is good.

The borrower distribution of home mortgage loans is good among borrowers of different income levels for each of the four full-scope assessment areas. The borrower distribution of small business loans is excellent among businesses of different sizes for each of the full-scope assessment areas. In addition, the borrower distribution of small farm loans among farms of different sizes is excellent in both assessment areas where small farm loans were reviewed.

### **Community Development Loans**

Truist is a leader in making community development loans in Pennsylvania. During this evaluation period, the bank originated 321 community development loans totaling \$472.6 million. This performance represents 4.5 percent by number and 2.9 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 113 community development loans totaling \$339.2 million were made.

Since the previous evaluation, Truist originated a \$27.6 million loan to a special purpose entity that benefits a broader state-wide area that includes the assessment areas. Specifically, loan proceeds were used to invest in multiple community development entities that make qualified investments such as New Market Tax Credits and other tax credit programs throughout a state-wide area.

In addition, the bank originated 10 loans totaling \$30.1 million outside of the assessment areas but within Pennsylvania. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered.

Performance was consistent in all full-scope assessment areas with the exception of the Philadelphia MD assessment area where the bank originated a relatively high level of community development loans. The analysis for each full-scope Pennsylvania assessment area includes a detailed discussion of community development loans.

### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in Pennsylvania. The level of investments is significant and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-

scope assessment areas, except in the Philadelphia MD assessment area where the bank's performance was excellent.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in Pennsylvania. The bank provided 404 qualified investments for \$174.2 million. This represents 3.0 percent of bank-wide qualified investments, which is below the 7.3 percent of branches and 3.6 percent of deposits in the state. Of the total qualified investments, 55 were new investments for \$101.0 million, 17 were prior-period investments for \$64.7 million, and 332 were grants for \$8.6 million. The bulk of qualified investments in Pennsylvania support affordable housing, community service, and economic development.

On a state-wide level, the bank provided one grant for \$100,000 to an organization with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Pennsylvania. Additional qualified investment information and examples are discussed under each full-scope assessment area.

### **SERVICE TEST**

The Service Test is rated High Satisfactory for Pennsylvania. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. Truist operates 153 branches in Pennsylvania, which represents 7.3 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is below the percent of the population in the respective tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank's branch distribution by tract income level in Pennsylvania.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	135	6.3	516,307	5.9	5	3.3	0	0.0	2	4.5
Moderate	441	20.4	1,699,431	19.4	24	15.7	0	0.0	10	22.7
Middle	966	44.7	4,069,521	46.5	79	51.6	0	0.0	19	43.2
Upper	564	26.1	2,368,003	27.1	43	28.1	2	100.0	13	29.5
NA	54	2.5	94,961	1.1	2	1.3	0	0.0	0	0.0
<b>Totals</b>	<b>2,160</b>	<b>100.0</b>	<b>8,748,223</b>	<b>100.0</b>	<b>153</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 2 and closed 44 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the Branch Closings, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 859 community development services since the last evaluation. This performance represents 6.6 percent of bank-wide activities, which is consistent with the state-wide share of branches at 7.3 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Montgomery County MD	8	184	11	1	204
Lancaster MSA	3	112	3	0	118
Allentown MSA	13	91	14	0	118
Philadelphia MD	33	60	7	0	100
Reading MSA	1	51	16	0	68
York MSA	0	46	4	0	50
Harrisburg MSA	1	50	8	0	59
PA Non-MSA	0	40	0	0	40
Chambersburg MSA	0	21	6	0	27
Scranton MSA	1	17	2	0	20
Gettysburg MSA	1	5	2	1	9
Lebanon MSA	0	10	0	0	10
Williamsport MSA	0	9	1	0	10
State College MSA	1	18	0	0	19
East Stroudsburg MSA	0	0	7	0	7
<b>Total</b>	<b>62</b>	<b>714</b>	<b>81</b>	<b>2</b>	<b>859</b>
<i>Source: Bank Records</i>					

## MONTGOMERY COUNTY MD ASSESSMENT AREA– Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MONTGOMERY COUNTY MD ASSESSMENT AREA

The Montgomery MD assessment area consists of all 3 counties within the Montgomery County-Bucks County-Chester County, PA MD. The bank operates 41, or 26.8 percent, of its Pennsylvania branch offices in the Montgomery County MD assessment area. The assessment area also represents 44.5 percent of the rated-area loans by dollar volume, 32.0 percent of rated-area lending by number of loans, and 27.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units, farms, and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Minimal levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to \$2.0 million, and the number of census tracts increased to 490. Regarding housing costs, the median housing value increased significantly to \$352,295, and the median gross rent increased to \$1,348. The total amount of farms increased to 7,810. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Montgomery County MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	470	4.0	21.1	46.6	27.7	0.6
Population by Geography	1,949,350	3.5	19.0	47.9	29.3	0.3
Housing Units by Geography	768,553	3.9	20.1	48.2	27.8	0.0
Owner-Occupied Units by Geography	541,872	1.6	16.4	49.9	32.2	0.0
Occupied Rental Units by Geography	185,877	9.8	29.9	44.6	15.8	0.0
Vacant Units by Geography	40,804	8.3	25.9	42.1	23.6	0.0
Businesses by Geography	271,762	2.6	14.6	47.9	34.8	0.0
Farms by Geography	7,178	1.9	15.8	52.8	29.5	0.0
Family Distribution by Income Level	508,147	20.0	18.3	22.0	39.7	0.0
Household Distribution by Income Level	727,749	23.6	16.5	18.2	41.6	0.0
Median Family Income - Montgomery County-Bucks County-Chester County, PA MD	\$99,939	Median Housing Value				\$318,012
		Median Gross Rent				\$1,187
		Families Below Poverty Level				4.3%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Montgomery County MD assessment area was 3.5 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and retail trade. The top employers were Total Health, The Vanguard Group, Einstein Healthcare Network, Universal Health Services Inc., and Holy Redeemer Health System.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 51 FDIC-insured institutions operated 610 branches within this area. Of these institutions, Truist ranked 7<sup>th</sup> in total deposits with a market share of 5.0 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Four community contacts from economic development organizations and housing agencies were referenced within the Montgomery County MD assessment area. The contacts noted a need for financial literacy/counseling services for low- and moderate-income individuals. The contacts also noted a lack of housing stock.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 38.3 percent of the families are low- or moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MONTGOMERY COUNTY MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Montgomery County MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses and farms of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage, small business, and small farm loans is good

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was slightly below demographic data but consistent with aggregate lending data. In 2022, performance in moderate-income tracts was above demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was above both demographic and aggregate data.

The geographic distribution of small farm loans reflects excellent penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income tracts was well above the aggregate and demographic lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage, small business, and small farm loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

The borrower distribution of small farm loans reflects excellent penetration among farms of different sizes. Performance was significantly above the aggregate lending data but was below the demographic data. In 2022, lending to small farms increased to 86.8 percent but remained below the demographic data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Montgomery County MD assessment area. The bank originated 78 community development loans totaling \$117.6 million. This amount represents 24.3 percent by number and 24.9 percent by dollar volume of total community development loans originated in Pennsylvania. Regarding the community development purpose, 5 loans supported affordable housing, 5 loans supported community services, and 68 loans supported economic development. Examples of community development loans follow.



- \$15.0 million line of credit to an organization that provides essential services to low- and moderate-income individuals, including disabled persons. Examples of services provided include residential living options, workforce development programs, day programs, and educational services.
- \$4.4 million loan to finance a LIHTC multifamily apartment complex that provides 50 units of affordable housing for low- and moderate-income individuals.

## **INVESTMENT TEST**

The level of investments is significant and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Montgomery County MD assessment area. Qualified investments total \$38.3 million, or 0.7 percent, of bank-wide qualified investments which is below the percent of deposits of 1.0 and the percent of branches at 1.9 in this assessment area. Investments included 13 new investments for \$24.6 million, 3 prior-period investments for \$13.0 million, and 47 grants totaling \$644,820. Most of the qualified investments support economic development in the assessment area. Examples are provided below.

- \$7.8 million in MBSs to support community service by funding a low-income Medicaid certified nursing home in a moderate-income census tract in the assessment area.
- \$6.0 million in LIHTCs for the construction of a 51-unit affordable multifamily development. The project is targeted to the homeless and near-homeless in the assessment area that earn below 60 percent of the area median income.
- \$9.3 million in several SBA bonds that support economic development by providing funding to small businesses in the assessment area.
- \$1.5 million in SBICs that support economic development through the funding of small businesses in the assessment area.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts; however, the branch distribution in moderate-income census tracts is significantly above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 9 low-income and 25 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In

In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	19	3.9	71,484	3.5	0	0.0	0	0.0	1	12.5
Moderate	105	21.4	404,055	19.8	13	31.7	0	0.0	2	25.0
Middle	220	44.9	941,417	46.2	18	43.9	0	0.0	3	37.5
Upper	137	28.0	603,410	29.6	10	24.4	1	100.0	2	25.0
NA	9	1.8	17,138	0.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>490</b>	<b>100.0</b>	<b>2,037,504</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened one and closed eight branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 204 community development services. This performance represents 23.8 percent of all activities in the state, which is slightly below the assessment area's share of state-wide branches at 26.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a community development corporation that provides affordable housing, homebuyer education; and food vouchers for low- and moderate-income individuals and families,
- A bank employee serves on the Board of a non-profit organization that provides affordable housing for low-income individuals.
- A bank employee serves on the Board of an economic development organization with a mission to increase business and workforce opportunities for low- and moderate-income business owners.

## LANCASTER MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LANCASTER MSA ASSESSMENT AREA

The Lancaster MSA assessment area consists of Lancaster County, which is the sole county within the Lancaster, PA MSA. The bank operates 21, or 13.7 percent, of its Pennsylvania branch offices in the Lancaster MSA assessment area. The assessment area also represents 9.4 percent of the rated-area loans by dollar volume, 11.9 percent of rated-area lending by number of loans, and 17.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units, farms, and businesses are primarily within middle -income census tracts. The levels within the moderate- and upper-income census tracts area comparable with minimal levels noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 552,984, and the number of census tracts increased to 116. Regarding housing costs, the median housing value increased significantly to \$219,308, and the median gross rent increased to \$1,086. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Lancaster MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	98	6.1	14.3	68.4	11.2	0.0
Population by Geography	530,216	4.3	10.6	73.6	11.6	0.0
Housing Units by Geography	205,587	4.0	11.3	72.4	12.3	0.0
Owner-Occupied Units by Geography	134,548	1.6	8.8	76.1	13.5	0.0
Occupied Rental Units by Geography	60,782	8.6	16.0	66.0	9.5	0.0
Vacant Units by Geography	10,257	8.1	16.3	63.2	12.4	0.0
Businesses by Geography	50,073	4.1	11.0	72.4	12.4	0.0
Farms by Geography	2,401	0.8	3.2	86.5	9.5	0.0
Family Distribution by Income Level	137,133	18.3	19.2	23.1	39.4	0.0
Household Distribution by Income Level	195,330	22.1	17.4	19.6	40.8	0.0
Median Family Income - Lancaster, PA MSA	\$68,937	Median Housing Value				\$188,318
		Median Gross Rent				\$959
		Families Below Poverty Level				7.3%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Lancaster MSA assessment area was 3.5 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, manufacturing, and retail trade. The top employers were Lancaster General Hospital, Giant Food Stores, Eurofins Lancaster Laboratories Inc., High Companies, and Masonic Villages at Elizabethtown.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 24 FDIC-insured institutions operated 156 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 17.4 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from a CDFI organization and a workforce development organization were referenced within the Lancaster MSA assessment area. One contact noted a need for small business, affordable housing, and infrastructure lending. While the other contact noted opportunities available to banks to target funding to low- and moderate-income families or geographies, which could qualify for CRA credit such as providing funding to health and human services.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 37.5 percent of the families are low- or moderate-income. The community contacts confirmed the need for affordable housing and small business lending.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LANCASTER MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Bank's Lending Test performance in the Lancaster MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending to borrowers of different income levels and businesses and farms of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage, small business, and small farm loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, performance in moderate-income tracts was above demographic lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was slightly below the demographic and aggregate lending data. However, in 2022 performance was similar to the demographic data.

The geographic distribution of small farm loans reflects adequate penetration throughout the assessment area. The bank did not originate any small farm loans in low- or moderate-income census tracts. However, the level of farms in low-income census tracts is low. In addition, the aggregate lending data in low- and moderate-income census tracts was minimal at 0.0 percent and 0.2 percent, respectively. In 2022, the bank originated 3.7 percent of loans in moderate-income census tracts; however, the performance was still below demographic data.

### **Borrower Profile**

The overall borrower distribution of home mortgage, small business, and farm loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was above demographic lending data and consistent with aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

The borrower distribution of small farm loans reflects excellent penetration among farms of different sizes. This performance was above the aggregate lending data but below the demographic data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Lancaster MSA assessment area. The bank originated 44 community development loans totaling \$72.0 million. This amount represents 13.7 percent by number and 15.2 percent by dollar volume of total community development loans originated in Pennsylvania. Regarding the community development purpose, 3 loans supported affordable housing, 4 loans supported community services, 36 loans supported economic development, and 1 loan supported revitalization or stabilization. Examples of community development loans follow.

- \$7.2 million loan to a retail business to fund a new location creating over 20 permanent jobs for low- and moderate-income individuals.
- \$1.5 million line-of-credit to a non-profit organization that provides essential services to low- and moderate-income individuals, including disabled persons.

## **INVESTMENT TEST**

The level of investments is significant and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Lancaster MSA assessment area. Qualified investments total \$30.7 million, or 0.5 percent of bank-wide qualified investments, which is consistent with the percent of deposits at 0.6 but below the percent of branches of 1.0 in this assessment area. Investments include 15 new investments for \$20.2 million, 1 prior-period investment for \$9.6 million, and 38 grants totaling \$941,836. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$11.2 million in LIHTCs for the redevelopment of a former hospital into a mixed-use site that includes affordable multifamily housing.
- \$9.0 million in several SBA bonds that support economic development by providing funding to small businesses in the assessment area.
- \$150,000 community service grant to a local non-profit foundation that provides career path training and scholarships to low-income persons in the assessment area.
- \$100,000 affordable housing grant to a non-profit that seeks to turn vacant land into affordable housing in the assessment area.

## **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 4 low-income and 7 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	4	3.4	15,766	2.9	0	0.0	0	0.0	0	0.0
Moderate	16	13.8	70,924	12.8	1	4.8	0	0.0	0	0.0
Middle	81	69.8	394,806	71.4	15	71.4	0	0.0	3	100.0
Upper	15	12.9	71,488	12.9	5	23.8	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>116</b>	<b>100.0</b>	<b>552,984</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed three branches in middle-income census tracts during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 118 community development services. This performance represents 13.7 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 13.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a housing finance agency that cultivates partnerships and resources to increase the availability of affordable housing.
- A bank employee serves on the Board of a non-profit organization that provides temporary housing for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides pediatric services for low-income families.

## ALLENTOWN MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ALLENTOWN MSA ASSESSMENT AREA

The Allentown MSA assessment area consists of all 3 counties within the Allentown-Bethlehem-Easton, PA-NJ MSA. The bank operates 20, or 13.1 percent, of its Pennsylvania branch offices in the Allentown MSA assessment area. The assessment area also represents 9.5 percent of the rated-area loans by dollar volume, 12.1 percent of rated-area lending by number of loans, and 15.7 percent of the rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with a fair level in the moderate-income census tracts. Levels in the low-income census tracts are significantly lower. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 752,257, and the number of census tracts increased to 172. Regarding housing costs, the median housing value increased significantly to \$204,518, and the median gross rent increased to \$1,095. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Allentown MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	156	10.3	19.9	44.9	25.0	0.0
Population by Geography	721,006	8.7	20.4	41.6	29.3	0.0
Housing Units by Geography	298,710	8.4	20.5	43.8	27.3	0.0
Owner-Occupied Units by Geography	190,410	3.5	14.9	46.5	35.1	0.0
Occupied Rental Units by Geography	82,228	17.5	30.7	38.3	13.5	0.0
Vacant Units by Geography	26,072	14.9	29.0	42.0	14.1	0.0
Businesses by Geography	71,857	8.0	17.3	40.1	34.7	0.0
Farms by Geography	1,870	2.3	9.9	50.2	37.6	0.0
Family Distribution by Income Level	185,549	21.3	18.5	21.4	38.8	0.0
Household Distribution by Income Level	272,638	24.3	16.5	18.9	40.3	0.0
Median Family Income - Allentown-Bethlehem-Easton, PA-NJ MSA	\$71,539	Median Housing Value				\$186,888
		Median Gross Rent				\$936
		Families Below Poverty Level				8.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						



According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Allentown MSA assessment area was 4.2 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, professional and business services, and manufacturing. The top employers were Lehigh Valley Health Network, St. Luke's University Health Network, Walmart Inc., Dorney Park/Wildwater Kingdom, and Mack Trucks.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 30 FDIC-insured institutions operated 203 branches within this area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 10.6 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from a community organization and a housing development authority were referenced within the Allentown MSA assessment area. The contacts noted a need for financial literacy outreach programs to assist the low- and moderate-income individuals who are struggling with the rising costs of rent and housing. The contacts noted opportunities for financial institutions to possibly receive CRA credit by assisting organizations with the revitalization and rehabilitation of the aging housing stock or funding school food pantries where approximately 90 percent of school district students qualify for free or reduced lunch. A need for micro small business loans was also noted.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.8 percent of the families are low- or moderate-income. The community contact also provided a need for small business lending.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN ALLENTOWN MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Allentown MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was slightly below both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was below demographic lending data but consistent with aggregate lending data. Performance in moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, performance in moderate-income census tracts was below demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above the aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 77.4 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Allentown MSA assessment area. The bank originated 53 community development loans totaling \$63.9 million. This amount represents 16.5 percent by number and 13.5 percent by dollar volume of total community development loans originated in Pennsylvania. Regarding the community development purpose, 2 loans supported affordable housing, 8 loans supported community services, 40 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$10.0 million loan to a non-profit economic development corporation that fosters business growth and construction of industrial sites throughout the assessment area, including low- and moderate-income geographies.
- 5 loans totaling \$526,000 to a non-profit organization that provides emergency and transitional housing, food, clothing, and advocacy services for homeless and low-income individuals.

## **INVESTMENT TEST**

The level of investments is significant and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Allentown MSA assessment area. Qualified investments total \$24.6 million, or 0.4 percent of bank-wide qualified investments, which is below the percent of deposits of 0.6 and percent of branches at 0.9 in this assessment area. Investments included 10 new investments for \$17.0 million, 2 prior-period investments for \$6.3 million, and 55 grants totaling \$1.3 million. Most of the qualified investments support affordable housing, community service, and economic development in the assessment area. Examples are provided below.

- \$6.9 million in MBSs to support community service by funding a low-income Medicaid certified nursing home in a moderate-income census tract in the assessment area.
- \$1.6 million in MBSs for the financing of a 210-unit affordable multifamily development for senior citizens. The development is also a HUD approved Section 8 property.
- \$7.3 million in several SBA bonds that support economic development by providing funding to small businesses in the assessment area.
- \$200,000 community service grant to a non-profit food bank that feeds the homeless and low-income residents of the assessment area.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is below the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 4 low-income and 15 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	15	8.7	59,789	7.9	1	5.0	0	0.0	1	9.1
Moderate	40	23.3	165,761	22.0	5	25.0	0	0.0	3	27.3
Middle	73	42.4	309,309	41.1	8	40.0	0	0.0	3	27.3
Upper	44	25.6	217,398	28.9	6	30.0	0	0.0	4	36.4
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>172</b>	<b>100.0</b>	<b>752,257</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 11 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 118 community development services. This performance represents 13.7 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 13.1 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- Two bank employees serve on the Board of a non-profit organization that builds affordable housing for low- and moderate-income individuals and families.
- A bank employee serves on the Board of a non-profit organization that provides programs and services for food access and nutrition for low- and moderate-income families.
- Several bank employees collaborated with a non-profit organization to provide technical assistance to low- and moderate-income small business owners.

## PHILADELPHIA MD ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE PHILADELPHIA MD ASSESSMENT AREA

The Philadelphia MD assessment area consists of both counties within the MD. The bank operates 12, or 7.8 percent, of its Pennsylvania branch offices in the Philadelphia MD assessment area. The assessment area represents 12.0 percent of the rated-area loans by dollar volume, 9.1 percent of rated-area lending by number of loans, and 5.4 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the largest levels of owner-occupied housing units and businesses are within the upper-income census tracts. Comparable levels are noted in the moderate- and middle-income census tracts with significantly lower levels in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.18 million, and the number of census tracts increased to 560. Regarding housing costs, the median housing value increased significantly to \$222,423, and the median gross rent increased to \$1,137. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Philadelphia MD Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	528	10.0	29.0	21.0	37.3	2.7
Population by Geography	2,116,755	10.5	30.2	22.7	36.2	0.5
Housing Units by Geography	892,478	10.2	30.4	22.2	37.0	0.3
Owner-Occupied Units by Geography	448,432	7.0	24.3	23.5	45.1	0.0
Occupied Rental Units by Geography	336,435	12.8	34.6	21.4	30.5	0.7
Vacant Units by Geography	107,611	15.1	42.6	18.8	23.4	0.2
Businesses by Geography	253,050	7.1	25.7	19.5	46.6	1.2
Farms by Geography	2,188	4.2	14.3	15.8	65.0	0.8
Family Distribution by Income Level	446,201	25.2	15.9	16.3	42.7	0.0
Household Distribution by Income Level	784,867	27.2	14.5	15.1	43.2	0.0
Median Family Income - Philadelphia, PA MD	\$56,411	Median Housing Value				\$187,814
		Median Gross Rent				\$974
		Families Below Poverty Level				16.9%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Philadelphia MD assessment area was 5.0 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, professional and business services, and government. The top employers were University of Pennsylvania Health System, Thomas Jefferson University and TJU Health System Inc., Children's Hospital of Philadelphia, Comcast, and Drexel University.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 101 FDIC-insured institutions operated 1,481 branches within this area. Of these institutions, Truist ranked 13th in total deposits with a market share of 1.0 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Four community contacts from a community organization, a housing development authority, and economic development authority agencies were referenced within the Philadelphia MD assessment area. The contacts noted the primary credit need is affordable housing for the development of affordable rental units and financing for owner-occupied homes. The contacts noted a need for financial institution's community development activities, as much of the area is low-and-moderate income. Lastly, the contacts noted a need for small business loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 41.1 percent of the families are low- or moderate-income. Community contacts also provided that affordable housing and small business lending are credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE PHILADELPHIA MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Philadelphia MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and originated a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was below demographic and aggregate lending data. Performance in moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, performance in low-income census tracts was consistent with demographic data, and performance in moderate-income census tracts was above demographic data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was below demographic lending data but consistent with aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 88.9 percent.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Philadelphia MD assessment area. The bank originated 41 community development loans totaling \$57.7 million. This amount represents 12.8 percent by number and 12.2 percent by dollar volume of total community development loans originated in Pennsylvania. Regarding the community development purpose, 4 loans supported affordable housing, 14 loans supported community services, 20 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$8.0 million loan to renovate a commercial facility, which will provide four new business tenants with commercial space and create permanent jobs for low- and moderate-income persons.
- \$8.3 million loan for a public school district to finance improvements to school buildings. The school district predominately serves low- and moderate-income students.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Philadelphia MD assessment area. Qualified investments total \$24.1 million, or 0.4 percent of bank-wide qualified investments, which exceeds the percent of deposits of 0.2 but is below the percent of branches at 0.6 in this assessment area. Investments included 4 new investments for \$16.1 million, 2 prior-period investments for \$4.7 million, and 89 grants totaling \$3.3 million. Most of the qualified investments support economic development in the assessment area. Examples are provided below.

- \$13.3 million to SBICs that supports economic development through the funding of small businesses in the assessment area.
- \$1.8 million investment to renovate and stabilize a school located in a moderate-income census tract. The school revitalization is part of a plan to help stabilize the surrounding neighborhood.
- \$500,000 economic development grant to a non-profit CDFI. Funds will be used to support small businesses through the non-profit's programs that provide capital, advocacy, and capacity building to other CDFIs and small businesses.
- \$495,000 community service grant to a non-profit that installs broadband internet infrastructure in low-income communities where needed to complete online learning during the pandemic.

### **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is below the percent of the population in the respective tracts, while the bank does not have any branches in moderate-income census. However, branches in middle- and upper-income census tracts serve approximately 3 low-income and 13 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	52	9.3	216,602	9.9	1	8.3	0	0.0	0	0.0
Moderate	140	25.0	592,515	27.2	0	0.0	0	0.0	0	0.0
Middle	119	21.3	519,968	23.8	1	8.3	0	0.0	0	0.0
Upper	215	38.4	809,061	37.1	10	83.3	1	100.0	2	100.0
NA	34	6.1	42,481	1.9	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>560</b>	<b>100.0</b>	<b>2,180,627</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank opened one and closed two branches in upper-income census tracts during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 100 community development services. This performance represents 11.6 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 7.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides housing counseling and financial literacy programs aimed at increasing home ownership opportunities for low- and moderate-income homebuyers.
- A bank employee serves on the Board of an advisory group dedicated to advocacy, policy development, technical assistance, and revitalization of underserved low-income communities.
- A bank employee serves on the Board of a community development association with a mission to revitalize low- and moderate-income communities.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the 11 Pennsylvania assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Reading MSA	Consistent	Below	Consistent
York MSA	Consistent	Consistent	Consistent
Harrisburg MSA	Consistent	Exceeds	Consistent
PA Non-MSA	Consistent	Consistent	Below
Chambersburg MSA	Consistent	Consistent	Consistent
Scranton MSA	Consistent	Consistent	Consistent
Gettysburg MSA	Consistent	Consistent	Consistent
Lebanon MSA	Consistent	Below	Exceeds
Williamsport MSA	Consistent	Consistent	Consistent
State College MSA	Consistent	Below	Consistent
East Stroudsburg MSA	Consistent	Below	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exception of the PA Non-MSA assessment area, which is below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

## Reading MSA Assessment Area

The Reading MSA assessment area consists of Berks County. Truist operates 13 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,645	\$145.4 million
Home Mortgage Loans	1,187	\$182.6 million
Small Farm Loans	46	\$4.1 million
Community Development Loans	30	\$37.6 million
Investments (New)	4	\$4.6 million
Investments (Prior Period)	1	\$941 thousand
Donations	29	\$364 thousand
CD Services	68	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Reading MSA assessment area are in Appendix D.

## York MSA Assessment Area

The York MSA assessment area consists of York County. Truist operates ten branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,086	\$66.4 million
Home Mortgage Loans	1,724	\$315.5 million
Small Farm Loans	34	\$5.9 million
Community Development Loans	7	\$4.0 million
Investments (New)	3	\$9.9 million
Investments (Prior Period)	1	\$5.9 million
Donations	18	\$233 thousand
CD Services	50	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the York MSA assessment area are in Appendix D.

## Harrisburg MSA Assessment Area

The Harrisburg MSA assessment area consists of Cumberland, Dauphin, and Perry Counties. Truist operates ten branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	936	\$47.0 million
Home Mortgage Loans	1,057	\$230.4 million
Small Farm Loans	14	\$2.1 million
Community Development Loans	14	\$36.5 million
Investments (New)	2	\$1.1 million
Investments (Prior Period)	3	\$14.5 million
Donations	18	\$282 thousand
CD Services	59	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Harrisburg MSA assessment area are in Appendix D.

## PA Non-MSA Assessment Area

The PA Non-MSA assessment area consists of Bedford, Fulton, Northumberland, Schuylkill, and Snyder Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	932	\$48.2 million
Home Mortgage Loans	732	\$74.8 million
Small Farm Loans	21	\$1.5 million
Community Development Loans	12	\$1.7 million
Investments (New)	0	\$0
Investments (Prior Period)	1	\$4.3 million
Donations	12	\$1.0 million
CD Services	40	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the PA Non-MSA assessment area are in Appendix D.

### Chambersburg MSA Assessment Area

The Chambersburg MSA assessment area consists of Franklin County. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	493	\$29.7 million
Home Mortgage Loans	536	\$77.7 million
Small Farm Loans	9	\$1.1 million
Community Development Loans	2	\$376 thousand
Investments (New)	0	\$0
Investments (Prior Period)	1	\$4.3 million
Donations	1	\$4 thousand
CD Services	27	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Chambersburg MSA assessment area are in Appendix D.

### Scranton MSA Assessment Area

The Scranton MSA assessment area consists of Lackawanna, Luzerne, and Wyoming Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	481	\$23.3 million
Home Mortgage Loans	392	\$56.3 million
Small Farm Loans	4	\$315 thousand
Community Development Loans	8	\$7.2 million
Investments (New)	1	\$3.3 million
Investments (Prior Period)	1	\$867 thousand
Donations	6	\$52 thousand
CD Services	20	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Scranton MSA assessment area are in Appendix D

## Gettysburg MSA Assessment Area

The Gettysburg MSA assessment area consists of Adams County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	324	\$13.9 million
Home Mortgage Loans	503	\$105.9 million
Small Farm Loans	2	\$233 thousand
Community Development Loans	8	\$7.8 million
Investments (New)	1	\$1.1 million
Investments (Prior Period)	0	\$0
Donations	3	\$27 thousand
CD Services	9	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Gettysburg MSA assessment area are in Appendix D

## Lebanon MSA Assessment Area

The Lebanon MSA assessment area consists of Lebanon County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	250	\$17.8 million
Home Mortgage Loans	232	\$41.0 million
Small Farm Loans	13	\$2.1 million
Community Development Loans	0	\$0
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	3	\$12 thousand
CD Services	10	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Lebanon MSA assessment area are in Appendix D.

### Williamsport MSA Assessment Area

The Williamsport MSA assessment area consists of Lycoming County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	254	\$23.1 million
Home Mortgage Loans	194	\$20.3 million
Small Farm Loans	4	\$322 thousand
Community Development Loans	3	\$3.8 million
Investments (New)	1	\$1.9 million
Investments (Prior Period)	0	\$0
Donations	2	\$14 thousand
CD Services	10	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Williamsport MSA assessment area are in Appendix D.

### State College MSA Assessment Area

The State College MSA assessment area consists of Centre County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	202	\$18.7 million
Home Mortgage Loans	155	\$41.1 million
Small Farm Loans	2	\$32 thousand
Community Development Loans	10	\$4.7 million
Investments (New)	1	\$1.3 million
Investments (Prior Period)	0	\$0
Donations	10	\$84 thousand
CD Services	19	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the State College MSA assessment area are in Appendix D.

### East Stroudsburg MSA Assessment Area

The East Stroudsburg assessment area consists of Monroe County. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	168	\$6.8 million
Home Mortgage Loans	210	\$40.4 million
Small Farm Loans	1	\$25 thousand
Community Development Loans	0	\$0
Investments (New)	0	\$0
Investments (Prior Period)	1	\$136 thousand
Donations	0	\$0
CD Services	7	--

Source: 2020-2022 HMDA and CRA LARs; Bank data from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the East Stroudsburg MSA assessment area are in Appendix D.



## **SOUTH CAROLINA**

### **CRA RATING FOR SOUTH CAROLINA: SATISFACTORY**

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

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

**The Service Test is rated: Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA**

The evaluation of the South Carolina performance considered the operations of Truist in 8 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 81, or 3.9 percent, of its total branch offices in South Carolina. South Carolina accounts for 3.1 percent of the bank-wide deposits, 3.6 percent of loans by dollar volume, and 3.8 percent of lending by number of loans. Overall, Truist ranks 3<sup>rd</sup> in the state in deposit market share at 12.1 percent. Competitor institutions in the South Carolina assessment areas include Bank of America, N.A., Wells Fargo, N.A., and First-Citizens Bank & Trust Company.

### **SCOPE OF EVALUATION – SOUTH CAROLINA**

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Greenville MSA, Charleston MSA, and Columbia MSA assessment areas. Limited scope areas include the Spartanburg MSA, Hilton Head MSA, SC Non-MSA, Florence MSA, and Sumter MSA assessment areas.

### **CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH CAROLINA**

#### **LENDING TEST**

The Lending Test is rated High Satisfactory for South Carolina. Lending levels reflect good responsiveness to the South Carolina assessment areas' credit needs. The geographic distribution reflects good penetration, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### **Lending Activity**

Lending levels reflect good responsiveness to the South Carolina assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each South Carolina assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of both home mortgage and small business loans reflects good penetration throughout the assessment areas. Overall performance was consistent throughout the full-scope assessment areas.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes for all three full-scope assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels for each full-scope assessment area.

### **Community Development Loans**

Truist is a leader in making community development loans in South Carolina. During this evaluation period, the bank originated 255 community development loans totaling \$460.4 million. This performance represents 3.6 percent by number and 2.9 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 112 community development loans totaling \$338.6 million were made.

Since the previous evaluation, Truist has originated 2 loans totaling \$284,000 to a non-profit organization that primarily provides community services to low- and moderate-income disabled individuals in a broader state-wide area that includes the assessment areas. In addition, the bank originated 22 loans totaling \$32.3 million outside of the assessment areas but within South Carolina. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered.

Performance varied among the full-scope assessment areas with Truist noted as a leader in the Greenville and Columbia MSA assessment areas. For the Charleston MSA assessment area, Truist made a relatively high level of community development loans. The analysis for each full-scope South Carolina assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in South Carolina. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance is consistent in each full-scope assessment area.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in South Carolina. The bank provided 234 qualified investments for \$127.4 million. This represents 2.2 percent of bank-wide qualified investments, which is below the 3.9 percent of branches and 3.1 percent of deposits in the state. Of the total qualified investments, 25 were new investments for \$78.5 million, 25 were prior-period

investments for \$42.6 million, and 184 were grants for \$6.2 million. The bulk of qualified investments in South Carolina support affordable housing.

On a state-wide level, the bank provided 3 prior-period investments for \$897,022 and 4 grants for \$524,500 to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than the prior-period investments and grants in South Carolina. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test rating for South Carolina is Outstanding. Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s assessment areas. Truist operates 81 branches in South Carolina, which represents 3.9 percent of bank-wide branches. Overall, the bank does not have any branches in low-income census tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve a significant number of low-income and moderate-income tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in South Carolina.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	49	5.0	149,396	4.0	0	0.0	0	0.0	2	6.7
Moderate	239	24.4	828,917	22.0	20	24.7	0	0.0	4	13.3
Middle	407	41.6	1,626,992	43.2	33	40.7	0	0.0	10	33.3
Upper	259	26.5	1,117,295	29.6	27	33.3	0	0.0	14	46.7
NA	25	2.6	45,914	1.2	1	1.2	0	0.0	0	0.0
<b>Totals</b>	<b>979</b>	<b>100.0</b>	<b>3,768,514</b>	<b>100.0</b>	<b>81</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed 30 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the Branch Closings, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 765 community development services since the last evaluation. This performance represents 5.9 percent of bank-wide activities, which is above the state-wide share of branches at 3.9 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. Examples of community development services are provided under each full-scope assessment area; however, South Carolina had 14 community development services that benefitted the entire state. The following are examples of community development services that benefit the entire state.

- A bank employee serves on the Board of a non-profit organization that focuses on building the capacity of local community development corporations by providing technical assistance, leadership development, access to capital, and advocacy.
- A bank employee serves on the Board of a non-profit education foundation that promotes student preparation for global competitiveness by fostering educational excellence and ensuring equal access to resources for low- and moderate-income students.
- A bank employee collaborated with an affordable housing association to plan and present an affordable housing and foreclosure prevention seminar.

The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Greenville MSA	5	257	17	0	279
Charleston MSA	4	107	15	0	126
Columbia MSA	11	111	11	0	133
Spartanburg MSA	0	49	7	0	56
SC Non-MSA	0	56	0	0	56
Hilton Head Island MSA	0	13	13	0	26
Florence MSA	5	45	1	0	51
Sumter MSA	0	13	11	0	24
State-wide Activities	3	7	4	0	14
<b>Total</b>	<b>28</b>	<b>658</b>	<b>79</b>	<b>0</b>	<b>765</b>

*Source: Bank Records*

## GREENVILLE MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREENVILLE MSA ASSESSMENT AREA

The Greenville MSA assessment area consists of all 4 counties within the Greenville-Anderson, SC MSA. The bank operates 24, or 29.6 percent, of its South Carolina branch offices in the Greenville MSA assessment area. The assessment area also represents 28.0 percent of the rated-area loans by dollar volume, 31.6 percent of rated-area lending by number of loans, and 33.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within the middle- and upper-income census tracts with good levels in the moderate-income census tracts. Levels in the low-income census tracts are nominal. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 928,195, and the number of census tracts increased to 231. The number of owner-occupied units increased to 243,770. The number of businesses in the MSA also increased significantly to 107,362. Regarding housing costs, the median housing value increased to \$183,639, and the median gross rent increased to \$906. The poverty rate decreased to 8.8 percent. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Greenville MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	195	7.7	27.2	40.5	24.6	0.0
Population by Geography	852,631	5.3	23.6	41.7	29.4	0.0
Housing Units by Geography	367,026	5.7	25.0	42.0	27.3	0.0
Owner-Occupied Units by Geography	220,754	3.1	20.9	43.6	32.4	0.0
Occupied Rental Units by Geography	102,937	10.3	30.7	38.7	20.3	0.0
Vacant Units by Geography	43,335	8.3	32.2	41.4	18.1	0.0
Businesses by Geography	59,501	6.0	18.4	39.2	36.3	0.0
Farms by Geography	1,678	2.7	19.7	49.1	28.4	0.0
Family Distribution by Income Level	218,963	22.9	17.1	18.8	41.2	0.0
Household Distribution by Income Level	323,691	24.9	15.9	16.7	42.4	0.0
Median Family Income - Greenville-Anderson, SC MSA	\$58,097	Median Housing Value				\$141,154
		Median Gross Rent				\$744
		Families Below Poverty Level				12.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Greenville MSA assessment area was 2.9 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business, government, and manufacturing. The top employers were Prisma Health, Michelin North America, Clemson University, Milliken & Company, and Bon Secours St. Francis Health System.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 36 FDIC-insured institutions operated 232 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 17.8 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Three community contacts from small business organizations were referenced within the Greenville MSA assessment area. One contact noted a need for financial literacy/counseling services for small business owners. The contact noted that many small business owners are not aware of the financial options banks can provide. All contacts noted a need for small business financing and affordable housing.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 40.0 percent of the families are low- or moderate-income. Community contacts provided similar credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GREENVILLE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Greenville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Greenville MSA assessment area. The bank originated 54 community development loans totaling \$122.2 million. This amount represents 21.2 percent by number and 26.5 percent by dollar volume of total community development loans originated in South Carolina. Regarding the community development purpose, 7 loans supported affordable housing, 44 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$7.0 million loan to finance construction and expansion of a public recreational complex in a low-income geography, which will help revitalize the area.
- \$1.4 million loan to help finance acquisition and rehabilitation costs of a multifamily apartment complex that provides 271 units of affordable housing for low- and moderate-income individuals.

### **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Greenville MSA assessment area. Qualified investments total \$43.5 million, or 0.8 percent, of bank-wide qualified investments which is below the percent of deposits of 1.0 and the percent of branches at 1.2 in this assessment area. Investments included 11 new investments for \$29.8 million, 4 prior-period investments for \$12.6 million, and 41 grants totaling \$1.1 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$8.9 million in LIHTCs to finance a 271-unit affordable multifamily housing development in the assessment area. The project was completed in partnership with the HUD rental assistance program.
- \$4.9 million in NMTCs for the rehabilitation of a vacant textile mill located in a low-income census tract in the assessment area. The project supports economic development by creating several spaces for small business and non-profit organizations with below market rents.
- \$3.5 million in LIHTCs to finance a 144-unit affordable multifamily development in the assessment area. The property is located in a low-income census tract and tenants are restricted to those earning less than 70 percent of the area median income.
- \$2.1 million in an SBIC that supports local small businesses in the assessment area.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts. However, the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 7 low-income and 37 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	13	5.6	38,599	4.2	0	0.0	0	0.0	1	7.7
Moderate	62	26.8	206,710	22.3	7	29.2	0	0.0	2	15.4
Middle	94	40.7	382,387	41.2	8	33.3	0	0.0	5	38.5
Upper	60	26.0	295,229	31.8	9	37.5	0	0.0	5	38.5
NA	2	0.9	5,270	0.6	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>231</b>	<b>100.0</b>	<b>928,195</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 13 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 279 community development services. This performance represents 36.5 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 29.6 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides temporary housing for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides essential services to low- and moderate-income individuals. Services provided include emergency financial assistance and workforce development.
- Bank employees facilitated multiple sessions of a financial literacy course covering financial management to low- and moderate-income students.

## CHARLESTON MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHARLESTON MSA ASSESSMENT AREA

The Charleston MSA assessment area consists of all 3 counties within the Charleston-North Charleston, SC MSA. The bank operates 13, or 16.0 percent, of its South Carolina branch offices in the Charleston MSA assessment area. This assessment area also represents 30.7 percent of the rated-area loans by dollar volume, 22.4 percent of rated-area lending by number of loans, and 16.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Levels in the low-income census tracts are minimal. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 799,636, and the number of census tracts increased to 178. The number of owner-occupied units increased to 200,413. The number of businesses in the MSA also increased significantly to 127,593. Regarding housing costs, the median housing value increased substantially to \$313,553 and the median gross rent increased to \$1,233. The poverty rate decreased to 8.2 percent. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Charleston MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	156	9.0	22.4	37.8	28.2	2.6
Population by Geography	712,232	6.7	21.4	41.9	29.2	0.8
Housing Units by Geography	309,113	6.7	21.2	40.2	31.1	0.8
Owner-Occupied Units by Geography	173,999	3.3	19.1	42.4	34.9	0.3
Occupied Rental Units by Geography	94,905	12.5	24.4	40.5	21.3	1.4
Vacant Units by Geography	40,209	8.1	22.9	29.9	37.5	1.7
Businesses by Geography	60,837	7.6	18.6	34.6	37.6	1.5
Farms by Geography	1,486	3.4	18.8	44.9	32.4	0.5
Family Distribution by Income Level	173,525	22.6	16.7	19.9	40.8	0.0
Household Distribution by Income Level	268,904	24.5	15.7	17.6	42.2	0.0
Median Family Income - Charleston-North Charleston, SC MSA	\$65,558	Median Housing Value				\$241,873
		Median Gross Rent				\$1,021
		Families Below Poverty Level				11.4%

*Source: 2015 ACS and 2021 D&B Data.*

*Due to rounding, totals may not equal 100.0 percent.*

*(\*) The NA category consists of geographies that have not been assigned an income classification.*

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Charleston MSA assessment area was 2.8 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and leisure and hospitality services. The top employers were Joint Base Charleston, Medical University of South Charleston, Roper St. Frances Healthcare, The Boeing Company, and Trident Health System.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 34 FDIC-insured institutions operated 184 branches within this area. Of these institutions, Truist ranked 4th in total deposits with a market share of 9.6 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from a small business development organization was referenced within the Charleston MSA assessment area. The contact noted a need for technical assistance services for startup and existing small business owners. The contact also indicated a need for banks' increased cooperation with CDFIs.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.3 percent of the families are low- or moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHARLESTON MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Charleston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and originated a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was generally consistent with demographic and aggregate lending data. However, in 2020, performance in moderate-income census tracts was below demographic and aggregate lending data. In addition, in 2022, performance in low-income census tracts was below demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was consistent with demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance decreased to 72.8 percent.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Charleston MSA assessment area. The bank originated 39 community development loans totaling \$58.8 million. This amount represents 15.3 percent by number and 12.8 percent by dollar volume of total community development loans originated in South Carolina. Regarding the community development purpose, 2 loans supported affordable housing, 4 loans supported community services, 30 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$3.0 million line of credit for a CDFI that provides financing and technical services to individuals, businesses, and non-profits, including those not served by traditional financial institutions.
- two loans totaling \$18.0 million to a non-profit community service organization to fund and expand operations. The organization provides job training and employment services for disadvantaged individuals.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Charleston MSA assessment area. Qualified investments total \$21.8 million, or 0.4 percent of bank-wide qualified investments, which is below the percent of deposits of 0.5 but the percent of branches at 0.6 in this assessment area. Investments included 3 new investments for \$13.6 million, 2 prior-period investment for \$6.0 million, and 50 grants totaling \$2.2 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$7.5 million in MBSs to finance a 300-unit affordable multifamily development. The apartment community was developed to address the extreme need for affordable housing in the Charleston market. Tenants are restricted to those earning 80 percent or less of the area median income.
- \$5.1 million in LIHTCs to finance a 96-unit affordable multifamily development for senior citizens. Tenants are restricted to those earning 70 percent or less of the area median income.
- \$1.0 million in LIHTCs to finance a 55-unit affordable multifamily development in the assessment area. Tenants are restricted to those earning 60 percent or less of the area median income.
- \$300,000 economic development grant to a local non-profit organization that supports small businesses in the assessment area. Programs include technical assistance and funding.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts. However, the branch distribution in moderate-income census tracts is significantly above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 4 low-income and 12 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	13	7.3	48,003	6.0	0	0.0	0	0.0	1	11.1
Moderate	48	27.0	199,660	25.0	5	38.5	0	0.0	2	22.2
Middle	56	31.5	270,413	33.8	3	23.1	0	0.0	2	22.2
Upper	56	31.5	274,545	34.3	5	38.5	0	0.0	4	44.4
NA	5	2.8	7,015	0.9	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>178</b>	<b>100.0</b>	<b>799,636</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed nine branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 126 community development services. This performance represents 16.5 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 16.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- Two bank employees serve on the Board of a non-profit organization that builds affordable housing for low- and moderate-income individuals and families.
- Two bank employees serve on the Board of a non-profit organization that provides essential services to low- and moderate-income individuals. Services provided include emergency financial assistance and healthcare services.
- A bank employee serves on the finance committee of a community loan fund. The fund finances projects that provide housing, access to food, and essential services for low- and moderate-income individuals and families.

## COLUMBIA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE COLUMBIA MSA ASSESSMENT AREA

The Columbia MSA assessment area consists of all 6 counties within the Columbia, SC MSA. The bank operates 19, or 23.5 percent, of its South Carolina branch offices in the Columbia MSA assessment area. The assessment area also represents 15.5 percent of the rated-area loans by dollar volume, 18.percent of rated-area lending by number of loans, and 24.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are well disbursed between the moderate-, middle-, and upper-income census tracts with significantly less level in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 829,470, and the number of census tracts increased to 226. The number of owner-occupied units increased to 217,967. The number of businesses in the MSA also increased significantly to 109,715. Regarding housing costs, the median housing value increased to \$166,660 and the median gross rent increased to \$961. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Columbia MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	191	8.4	29.3	31.4	28.3	2.6
Population by Geography	792,530	5.8	27.2	33.6	31.1	2.2
Housing Units by Geography	339,255	6.5	29.0	34.0	30.5	0.1
Owner-Occupied Units by Geography	199,786	2.7	24.6	36.0	36.7	0.0
Occupied Rental Units by Geography	98,191	13.3	34.6	31.3	20.8	0.0
Vacant Units by Geography	41,278	8.6	36.7	30.7	23.4	0.6
Businesses by Geography	55,102	8.6	23.8	32.3	34.7	0.6
Farms by Geography	1,675	2.4	27.4	37.9	32.2	0.1
Family Distribution by Income Level	192,940	23.1	16.7	19.5	40.8	0.0
Household Distribution by Income Level	297,977	24.3	16.2	17.9	41.6	0.0
Median Family Income - Columbia, SC MSA	\$62,665	Median Housing Value				\$147,580
		Median Gross Rent				\$855
		Families Below Poverty Level				12.0%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Columbia MSA assessment area was 3.1 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were Prisma Health Midlands, BlueCross BlueShield of South Carolina, Lexington Medical Center, University of South Carolina, and Walmart, Inc.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 26 FDIC-insured institutions operated 162 branches within this area. Of these institutions, Truist ranked 3rd in total deposits with a market share of 11.8 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from an economic development organization was referenced within the Columbia MSA assessment area. The contact stated financing for small business loans and state and local incentive programs are needs.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.8 percent of the families are low- or moderate-income. The community contact also provided that small business loans are a credit need.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE COLUMBIA MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Columbia MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and



aggregate lending data. Performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was below demographic data but consistent with aggregate lending data. Performance in moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 78.9 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Columbia MSA assessment area. The bank originated 53 community development loans totaling \$108.6 million. This amount represents 20.8 percent by number and 23.6 percent by dollar volume of total community development loans originated in South Carolina. Regarding the community development purpose, 9 loans supported affordable housing, 3 loans supported community services, 38 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans to separate entities totaling \$14.6 million to develop 2 multifamily LIHTC apartment buildings providing a combined 96 units of affordable housing for low- and moderate-income individuals.
- \$19.2 million loan to develop a multifamily LIHTC apartment complex that provides 42 units of affordable housing for low- and moderate-income individuals, including units designated for extremely low-income persons.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Columbia MSA assessment area. Qualified investments total \$32.2 million, or 0.6 percent of bank-wide qualified investments, which is below the percent of deposits at 0.8 and percent of branches of 0.9 in this

assessment area. Investments included 3 new investments for \$17.3 million, 6 prior-period investments for \$13.1 million, and 39 grants totaling \$1.8 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$8.1 million in LIHTCs for the construction of a 48-unit affordable multifamily development in the assessment area. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$7.9 million in LIHTCs for the construction of a 40-unit affordable multifamily development in the assessment area. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$1.3 million in LIHTCs for the financing of a 240-unit affordable multifamily development in the assessment area. The apartments are rent restricted to persons making less than 60 percent of the area median income.
- \$200,000 economic development grant to a non-profit small business incubator in the assessment area.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank provides a relatively high level of community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not operate any branches in low-income census tracts. The branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 8 low-income and 29 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	11	4.9	27,968	3.4	0	0.0	0	0.0	0	0.0
Moderate	56	24.8	192,956	23.3	4	21.1	0	0.0	0	0.0
Middle	90	39.8	340,598	41.1	10	52.6	0	0.0	0	0.0
Upper	62	27.4	243,771	29.4	4	21.1	0	0.0	1	100.0
NA	7	3.1	24,177	2.9	1	5.3	0	0.0	0	0.0
<b>Totals</b>	<b>226</b>	<b>100.0</b>	<b>829,470</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in a middle-income census tract during the evaluation period.

### **Community Development Services**

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 133 community development services. This performance represents 17.4 percent of all activities in the state, which is below the assessment area's share of state-wide branches at 23.5 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the finance committee of a community loan fund that provides access to capital for small businesses operated by minorities, women, and low-income individuals.
- A bank employee serves on the Board of a non-profit organization that provides early childhood education programs for low- and moderates-income families.
- A bank employee serves on a community development task force that supports the development, sustainability, and growth of women and minority-owned small businesses.

## OTHER ASSESSMENT AREAS – Limited-Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the five South Carolina assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Spartanburg MSA	Consistent	Consistent	Consistent
Hilton Head Island MSA	Consistent	Consistent	Below
SC Non-MSA	Consistent	Consistent	Below
Florence MSA	Consistent	Consistent	Consistent
Sumter MSA	Consistent	Consistent	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exceptions of the Hilton Head MSA and SC Non-MSA assessment areas, which are below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### **Spartanburg MSA Assessment Area**

The Spartanburg MSA assessment area consists of Spartanburg County. Truist operates seven branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,725	\$155.8 million
Home Mortgage Loans	1,476	\$307.5 million
Small Farm Loans	0	\$0
Community Development Loans	33	\$34.8 million
Investments (New)	4	\$11.2 million
Investments (Prior Period)	4	\$2.7 million
Donations	14	\$215 thousand
CD Services	56	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Spartanburg MSA assessment area are in Appendix D.

### Hilton Head Island MSA Assessment Area

The Hilton Head MSA assessment area consists of Beaufort and Jasper Counties. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	980	\$57.4 million
Home Mortgage Loans	1,153	\$363.8 million
Small Farm Loans	0	\$0
Community Development Loans	10	\$11.8 million
Investments (New)	2	\$2.8 million
Investments (Prior Period)	1	\$1.2 million
Donations	15	\$111 thousand
CD Services	26	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Hilton Head MSA assessment area are in Appendix D.

### SC Non-MSA Assessment Area

The SC Non-MSA assessment area consists of Colleton, Georgetown, Hampton, McCormick, Newberry, Oconee, and Orangeburg Counties. Truist operates nine branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,104	\$50.1 million
Home Mortgage Loans	1,237	\$308.6 million
Small Farm Loans	14	\$585 thousand
Community Development Loans	24	\$61.9 million
Investments (New)	0	\$0
Investments (Prior Period)	3	\$4.0 million
Donations	7	\$98 thousand
CD Services	56	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the SC Non-MSA assessment area are in Appendix D.

### **Florence MSA Assessment Area**

The Florence MSA assessment area consists of Darlington and Florence Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	444	\$44.1 million
Home Mortgage Loans	391	\$68.3 million
Small Farm Loans	10	\$1.3 million
Community Development Loans	17	\$29.7 million
Investments (New)	1	\$3.0 million
Investments (Prior Period)	1	\$2.1 million
Donations	10	\$82 thousand
CD Services	51	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Florence MSA assessment area are in Appendix D.

### **Sumter MSA Assessment Area**

The Sumter MSA assessment area consists of Clarendon and Sumter Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	342	\$16.6 million
Home Mortgage Loans	243	\$83.8 million
Small Farm Loans	0	\$0
Community Development Loans	1	\$84 thousand
Investments (New)	1	\$900 thousand
Investments (Prior Period)	1	\$132 thousand
Donations	4	\$13 thousand
CD Services	24	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Sumter MSA assessment area are in Appendix D.

## TENNESSEE

### CRA RATING FOR TENNESSEE: OUTSTANDING

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

The evaluation of the Tennessee performance considered the operations of Truist in 6 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 71, or 3.4 percent, of its total branch offices in Tennessee. Tennessee accounts for 3.2 percent of the bank-wide deposits, 2.9 percent of bank-wide loans by dollar volume, and 3.1 percent of bank-wide lending by number of loans. Overall, Truist ranks 4<sup>th</sup> in the state in deposit market share at 8.5 percent. Competitor institutions in the Tennessee assessment areas include First Horizon Bank, Regions Bank, and Pinnacle Bank.

### SCOPE OF EVALUATION – TENNESSEE

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Nashville MSA and Knoxville MSA assessment areas. Limited scope areas include the TN Non-MSA, Johnson City MSA, Morristown MSA, and Cleveland MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE

#### LENDING TEST

The Lending Test is rated High Satisfactory for Tennessee. Lending levels reflect good responsiveness to the Tennessee assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Given the percentage of loans originated in the Nashville MSA assessment area, more weight was placed on the bank's performance in this assessment area. The overall lending performance was consistent in the two full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Tennessee assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Tennessee assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good. The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Overall good performance in the Nashville MSA assessment area and adequate performance in the Knoxville MSA assessment area supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans is excellent among businesses of different sizes for both full-scope assessment areas. Home mortgage lending to borrowers of different income levels was good and is consistent in the two full-scope assessment areas.

### **Community Development Loans**

Truist is a leader in making community development loans in Tennessee. During this evaluation period, the bank originated 313 community development loans totaling \$586.0 million. This performance represents 4.4 percent by number and 3.6 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 30 community development loans totaling \$106.0 million were made.

Since the previous evaluation, Truist has originated 11 loans totaling \$44.4 million outside of the assessment areas but within Tennessee. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these loans follow.

- \$27,000 loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business is located in a moderate-income census tract.
- \$2.3 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business is located in a distressed middle-income census tract.

Performance in the full-scope assessment areas was consistent. The analysis for each full-scope Tennessee assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in Tennessee. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Tennessee. The bank provided 214 qualified investments for \$192.6 million. This represents 3.4 percent of bank-wide qualified investments, which is consistent with the 3.4 percent of branches and 3.2 percent of deposits in the state. Of the total qualified investments, 41 were new investments for \$157.7 million, 8 were prior-



period investments for \$28.0 million, and 165 were grants for \$6.9 million. The bulk of qualified investments in Tennessee support affordable housing.

On a state-wide level, the bank provided one grant for \$500,000 to an organization with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than the prior-period investments and grants in Tennessee. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test is rated Outstanding for Tennessee. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 71 branches in Tennessee, which represents 3.4 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the branch distribution by tract income level in Tennessee.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	40	4.6	144,213	3.8	3	4.2	0	0.0	0	0.0
Moderate	199	22.7	780,174	20.8	16	22.5	0	0.0	6	21.4
Middle	402	45.9	1,792,666	47.7	30	42.3	0	0.0	9	32.1
Upper	214	24.5	1,006,627	26.8	21	29.6	0	0.0	13	46.4
NA	20	2.3	33,938	0.9	1	1.4	0	0.0	0	0.0
<b>Totals</b>	<b>875</b>	<b>100.0</b>	<b>3,757,618</b>	<b>100.0</b>	<b>71</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### Changes in Branch Locations

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed 28 branches during the

evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in Tennessee. Bank records show that employees participated in 444 community development services since the last evaluation. This performance represents 3.4 percent of bank-wide activities, which is consistent with the state-wide share of branches at 3.4 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs.

In addition to the community development services provided under each full-scope assessment area, one bank employee serves on the Board of an economic development organization that promotes small businesses that benefits multiple assessment areas. The following table details the number of community development services by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Nashville MSA	6	169	29	0	204
Knoxville MSA	11	100	20	0	131
TN Non-MSA	1	45	2	0	48
Johnson City MSA	0	9	1	0	10
Cleveland MSA	0	19	7	0	26
Morristown MSA	0	24	0	0	24
State-wide Activities	0	0	1	0	1
<b>Total</b>	<b>18</b>	<b>366</b>	<b>60</b>	<b>0</b>	<b>444</b>

*Source: Bank Records*

## NASHVILLE MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE MSA ASSESSMENT AREA

The Nashville MSA assessment area consists of all 13 counties within the Nashville-Davidson-Murfreesboro--Franklin, TN MSA. The bank operates 35, or 49.3 percent, of its Tennessee branch offices in the Nashville MSA assessment area. The assessment area also represents 66.6 percent of the rated-area loans by dollar volume, 57.1 percent of rated-area lending by number of loans, and 59.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels within the moderate-income census tracts. Levels in low-income census tracts are minimal. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.0 million, and the number of census tracts increased to 427. Regarding housing costs, the median housing value increased significantly to \$285,736, and the median gross rent increased to \$1,157. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Nashville MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	374	9.1	25.1	38.5	25.9	1.3
Population by Geography	1,737,565	6.7	24.9	40.1	28.0	0.3
Housing Units by Geography	712,901	7.2	25.8	40.0	26.9	0.1
Owner-Occupied Units by Geography	429,693	3.4	19.5	43.7	33.3	0.1
Occupied Rental Units by Geography	226,419	13.3	36.1	33.9	16.7	0.0
Vacant Units by Geography	56,789	11.4	32.4	36.8	19.4	0.1
Businesses by Geography	194,672	7.6	20.3	31.1	40.2	0.8
Farms by Geography	4,801	3.5	18.9	45.2	32.1	0.4
Family Distribution by Income Level	432,746	20.7	17.7	20.4	41.1	0.0
Household Distribution by Income Level	656,112	22.8	16.8	18.2	42.2	0.0
Median Family Income - Nashville-Davidson-- Murfreesboro--Franklin, TN MSA	\$66,441	Median Housing Value				\$198,608
		Median Gross Rent				\$889
		Families Below Poverty Level				10.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Nashville MSA assessment area was 2.7 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and leisure and hospitality services. The top employers were Vanderbilt University Medical Center, Nissan North America, Inc., HCA Inc., Vanderbilt University, and Saint Thomas Health Services.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 63 FDIC-insured institutions operated 573 branches within this area. Of these institutions, Truist ranked 4<sup>th</sup> in total deposits with a market share of 9.3 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Three community contacts from organizations, including economic development and housing agencies, were referenced within the Nashville MSA assessment area. One contact from a small business development organization indicated a need for small business education and financial literacy programs. One housing organization indicated a need for additional affordable housing, along with down-payment assistance and homebuyer education. Additionally, funding is needed for developers who are interested in building affordable housing in the assessment area.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.4 percent of the families are low- or moderate-income. Community contacts also provided small business and affordable home loans as credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NASHVILLE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist Lending Test performance in the Nashville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was above demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic data but consistent with aggregate lending data. In 2022, performance in moderate-income areas increased to 23.0 percent, which was above demographic data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. However, performance in moderate-income census tracts was below demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was similar to the aggregate lending data. Lending to moderate-income borrowers was consistent with both the demographic and aggregate lending data. In 2022, lending to moderate-income borrowers increased to 21.8 percent, which was above demographic data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 85.2 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Nashville MSA assessment area. The bank originated 216 community development loans totaling \$361.4 million. This amount represents 69.0 percent by number and 61.7 percent by dollar volume of total community development loans originated in Tennessee. Regarding the community development purpose, 12 loans supported affordable housing, 7 loans supported community services, 160 loans supported economic development, and 37 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$70.5 million loan to expand a medical clinic and improve access to health services for residents in a moderate-income geography.

- \$43.0 million loan to develop a LIHTC multifamily housing complex providing 250 units of affordable housing for low- and moderate-income individuals.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Nashville MSA assessment area. Qualified investments total \$117.8 million, or 2.1 percent, of bank-wide qualified investments which exceeds the percent of deposits at 1.9 and the percent of branches of 1.7 in this assessment area. Investments included 15 new investments for \$98.6 million, 3 prior-period investments for \$14.3 million, and 87 grants totaling \$4.9 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$38.2 million in LIHTCs for the construction of a 250-unit affordable multifamily housing development. Local and state housing agencies partnered in the project and tenants are limited to those earning less than 80 percent of the area median income.
- \$13.4 million in LIHTCs to finance a 76-unit affordable multifamily housing development. Tenants are limited to those earning less than 70 percent of the area median income level.
- \$12.0 million in LIHTCs to finance a 428-unit affordable multifamily housing development in the assessment area. Tenants are limited to those earning less than 60 percent of the area median income.
- \$10.0 million in MBSs to finance a 210-unit affordable multifamily housing development. Tenants are limited to those earning less than 70 percent of the area median income, and rents are capped at 30 percent of income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 12 low-income and 35 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	23	5.4	91,074	4.6	2	5.7	0	0.0	0	0.0
Moderate	111	26.0	476,934	24.0	9	25.7	0	0.0	0	0.0
Middle	165	38.6	803,598	40.4	9	25.7	0	0.0	1	16.7
Upper	118	27.6	599,011	30.1	14	40.0	0	0.0	5	83.3
NA	10	2.3	18,902	1.0	1	2.9	0	0.0	0	0.0
<b>Totals</b>	<b>427</b>	<b>100.0</b>	<b>1,989,519</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed six branches in middle- and upper-income census tracts during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 204 community development services. This performance represents 46.0 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 49.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides food, clothing, transportation, childcare, and healthcare assistance for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that builds affordable housing for low- and moderate-income individuals and families.
- A bank employee serves on the Board of a housing development agency that promotes the construction of affordable housing units for low- and moderate-income individuals.

## KNOXVILLE MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KNOXVILLE MSA ASSESSMENT AREA

The Knoxville MSA assessment area consists of all 8 counties within the Knoxville, TN MSA. The bank operates 19, or 26.8 percent, of its Tennessee branch offices in the Knoxville MSA assessment area. The assessment area also represents 23.4 percent of the rated-area loans by dollar volume, 25.9 percent of rated-area lending by number of loans, and 27.5 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels within the moderate-income census tracts. Limited levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased significantly to \$187,432, and the median gross rent increased to \$852. Additionally, median family income increased to \$72,608. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Knoxville MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	199	5.5	24.1	42.7	24.6	3.0
Population by Geography	829,423	4.4	22.7	46.6	25.6	0.7
Housing Units by Geography	374,597	4.7	24.3	46.8	24.1	0.1
Owner-Occupied Units by Geography	226,798	2.4	18.8	50.0	28.8	0.0
Occupied Rental Units by Geography	106,139	9.7	32.6	40.3	17.3	0.1
Vacant Units by Geography	41,660	5.1	32.6	46.0	16.1	0.2
Businesses by Geography	66,896	4.0	18.1	41.3	35.9	0.7
Farms by Geography	1,882	2.0	17.6	50.2	29.9	0.3
Family Distribution by Income Level	214,794	22.4	16.8	19.8	41.0	0.0
Household Distribution by Income Level	332,937	24.5	16.2	16.5	42.9	0.0
Median Family Income - Knoxville, TN MSA	\$59,829	Median Housing Value				\$155,139
		Median Gross Rent				\$751
		Families Below Poverty Level				11.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data.                      Due to rounding, totals may not equal 100.0 percent.                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Knoxville MSA assessment area was 2.9 percent.



In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Y-12 National Security Complex, Covenant Health, University of Tennessee, Walmart Inc., and University of Tennessee Medical Center.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 41 FDIC-insured institutions operated 212 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 16.6 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Five community contacts from organizations, such as economic development and housing agencies, were referenced within the Knoxville MSA assessment area. Two contacts from economic development organizations indicated a need for small business financing, particularly loans from \$5,000 to \$50,000. One housing organization contact indicated a need for financial education for low- and moderate-income individuals. Several contacts indicated a need for affordable housing, noting a low supply paired with high demand and home prices that exceed the national average.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.2 percent of the families are low- or moderate-income. Community contacts confirmed the need for small business and affordable housing loans.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KNOXVILLE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Knoxville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects good distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic and aggregate lending data. However, in 2020, performance in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income tracts in 2020 was consistent with the aggregate lending data but below the demographic data. In addition, in 2022, performance in both low- and moderate-income tracts was consistent with the demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was similar to the aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Knoxville MSA assessment area. The bank originated 59 community development loans totaling \$118.3 million. This amount represents 18.8 percent by number and 20.2 percent by dollar volume of total community development loans originated in Tennessee. Regarding the community development purpose, 8 loans supported affordable housing, 3 loans supported community services, 41 loans supported economic development, and 7 loans supported revitalization or stabilization. Examples of community development loans follow.

- three loans totaling \$55.4 million to develop a LIHTC multifamily housing complex providing 192 units of affordable housing. This was a complex transaction that also included a \$16.2 million LIHTC equity investment by Truist.
- \$5.0 million line of credit to help finance expansion of a commercial facility and acquire additional commercial space in a low-income geography. The business expansion will create 100 to 120 permanent jobs, which primarily includes jobs for low- and moderate-income persons.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investment and grants in the Knoxville MSA assessment area. Qualified investments total \$62.3 million, or 1.1 percent of bank-wide qualified investments, which exceeds the percent of deposits at 0.9 and the percent of branches of 0.9 in this assessment area. Investments included 14 new investments for \$47.3 million, 4 prior-period investment for \$13.6 million, and 49 grants totaling \$1.4 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$16.2 million in LIHTCs to finance a 192-unit affordable multifamily development in the assessment area. The project was completed in partnership with state housing agencies, and tenants are restricted to those earning less than 70 percent of the area median income.
- \$7.2 million in LIHTCs to finance a 74-unit affordable multifamily housing development. Tenants are limited to those earning less than 60 percent of the area median income level.
- \$5.9 million in LIHTCs to finance an affordable 100-unit multifamily housing development. The property is located in a low-income census tract, and tenants are limited to those earning less than 80 percent of the area median income.
- \$5.8 million in LIHTCs to finance a 39-unit affordable multifamily housing development. Tenants are limited to those earning less than 80 percent of the area median income level.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 10 low-income and 20 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	13	5.8	40,704	4.6	0	0.0	0	0.0	0	0.0
Moderate	48	21.3	165,597	18.8	3	15.8	0	0.0	2	15.4
Middle	102	45.3	431,402	49.0	11	57.9	0	0.0	5	38.5
Upper	54	24.0	229,548	26.1	5	26.3	0	0.0	6	46.2
NA	8	3.6	12,522	1.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>225</b>	<b>100.0</b>	<b>879,773</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed 13 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 131 community development services. This performance represents 29.5 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 26.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides essential services to low- and moderate-income children and senior citizens, including after-school educational programs for children and structured activities for senior citizens.
- A bank employee serves on the Board of a non-profit organization that assists low- and moderate-income homeless individuals.
- A bank employee serves on the Board of a non-profit organization with the mission of strengthening communities by providing sustainable housing opportunities for low- and moderate-income families.

## OTHER TENNESSEE ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
TN Non-MSA	Consistent	Consistent	Consistent
Johnson City MSA	Consistent	Below	Below
Morristown MSA	Consistent	Consistent	Consistent
Cleveland MSA	Consistent	Below	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with or above the overall institution, with the exception of the Johnson City MSA assessment area, which is below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### TN Non-MSA Assessment Area

The TN Non-MSA assessment area consists of Franklin, Giles, Greene, Hardin, Lawrence, McMinn, Monroe, and Sevier Counties. Truist operates nine branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,038	\$42.9 million
Home Mortgage Loans	906	\$156.7 million
Small Farm Loans	10	\$487 thousand
Community Development Loans	16	\$48.9 million
Investments (New)	7	\$7.6 million
Investments (Prior Period)	0	\$0
Donations	7	\$47 thousand
CD Services	48	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the TN Non-MSA assessment area are in Appendix D.

### Johnson City MSA Assessment Area

The Johnson City MSA assessment area consists of all 3 counties within the MSA. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	631	\$20.9 million
Home Mortgage Loans	425	\$77.4 million
Small Farm Loans	0	\$0
Community Development Loans	5	\$2.3 million
Investments (New)	1	\$458 thousand
Investments (Prior Period)	0	\$0
Donations	8	\$93 thousand
CD Services	10	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Johnson City MSA assessment area are in Appendix D.

### Morristown MSA Assessment Area

The Morristown MSA assessment area consists of area consists of all 3 counties within the MSA. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	527	\$17.5 million
Home Mortgage Loans	342	\$55.4 million
Small Farm Loans	1	\$19 thousand
Community Development Loans	3	\$6.6 million
Investments (New)	3	\$2.1 million
Investments (Prior Period)	1	\$71 thousand
Donations	5	\$32 thousand
CD Services	24	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Morristown MSA assessment area are in Appendix D.

## Cleveland MSA Assessment Area

The Cleveland MSA assessment area consists of both counties within the MSA. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	423	\$25.0 million
Home Mortgage Loans	386	\$64.5 million
Small Farm Loans	3	\$263 thousand
Community Development Loans	3	\$4.1 million
Investments (New)	1	\$1.6 million
Investments (Prior Period)	0	\$0
Donations	8	\$41 thousand
CD Services	26	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022.		

## Geographic Distribution and Borrower Profile

Tables containing lending data for the Cleveland MSA assessment area are in Appendix D.

## ALABAMA

### CRA RATING FOR ALABAMA: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

The evaluation of the Alabama performance considered the operations of Truist in 12 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 57, or 2.7 percent, of its total branch offices in Alabama. Alabama accounts for 1.0 percent of the bank-wide deposits, 1.5 percent of bank-wide loans by dollar volume, and 1.7 percent of bank-wide lending by number of loans. Overall, Truist ranks 7<sup>th</sup> in the state in deposit market share at 3.3 percent. Competitor institutions in the Alabama assessment areas include Regions Bank, PNC Bank, N.A., and Wells Fargo Bank, N.A.

### SCOPE OF EVALUATION – ALABAMA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the Birmingham, Huntsville, Daphne, and Montgomery MSA assessment areas. Limited scope areas include the AL Non-MSA, Mobile, Auburn, Tuscaloosa, Florence, Anniston, Dothan, and Gadsden MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

#### LENDING TEST

The Lending Test is rated Outstanding for Alabama. Lending levels reflect good responsiveness to the Alabama assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

#### Lending Activity

Lending levels reflect good responsiveness to the Alabama assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Alabama assessment area.



### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage and small business loans reflects good penetration throughout the assessment areas. Performance was generally consistent among the assessment areas. Specifically, good performance in the Birmingham, Huntsville, and Daphne MSA assessment areas and adequate performance in the Montgomery MSA assessment area supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of both small business and home mortgage loans is excellent among businesses of different sizes and borrowers of different income levels. Consistent excellent performance in each of the four full-scope assessment areas supports the conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in Alabama. During this evaluation period, the bank originated 81 community development loans totaling \$403.1 million. This performance represents 1.1 percent by number and 2.5 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 58 community development loans totaling \$240.7 million were made.

Since the previous evaluation, Truist has originated 3 loans totaling \$7.7 million outside of the assessment areas but within Alabama. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these community development loans follow.

- \$4.1 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business is in a moderate-income census tract.
- \$3.7 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business loan helped retain jobs for low- and moderate-income individuals.

Performance was consistent in the full-scope assessment area with the exception of the Montgomery MSA assessment area was the bank originated an adequate level of community development loans. The analysis for each full-scope Alabama assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in Alabama. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

**Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in Alabama. The bank provided 170 qualified investments for \$83.5 million. This represents 1.5 percent of bank-wide qualified investments, which is below the 2.7 percent of branches but exceeds the 1.0 percent of deposits in the state. Of the total qualified investments, 42 were new investments for \$52.5 million, 7 were prior-period investments for \$28.7 million, and 121 were grants for \$2.3 million. The bulk of qualified investments in Alabama support affordable housing.

On a state-wide level, the bank provided 4 grants for \$55,000 to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Alabama. Additional qualified investment information and examples are discussed under each full-scope assessment area benefitted.

**SERVICE TEST**

The Service Test is rated Outstanding for Alabama. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

**Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 57 branches in Alabama, which represents 2.7 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is consistent with the percent of the population in the respective tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in Alabama.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	82	7.1	213,606	5.2	3	5.3	0	0.0	0	0.0
Moderate	264	23.0	821,226	19.9	11	19.3	0	0.0	3	30.0
Middle	490	42.7	1,874,909	45.4	25	43.9	0	0.0	4	40.0
Upper	279	24.3	1,159,706	28.1	17	29.8	0	0.0	3	30.0
NA	33	2.9	56,522	1.4	1	1.8	0	0.0	0	0.0
<b>Totals</b>	<b>1,148</b>	<b>100.0</b>	<b>4,125,969</b>	<b>100.0</b>	<b>57</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.*

Due to rounding, totals may not equal 100.0 percent.

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed 10 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in Alabama. Bank records show that employees participated in 399 community development services since the last evaluation. This performance represents 3.1 percent of bank-wide activities, which is above the bank-wide share of branches at 2.7 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs.

In addition to the community development services provided under each full-scope assessment area, 9 services primarily consisted of virtual financial literacy sessions for low- and moderate-income individuals that benefitted multiple assessment areas. The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Birmingham MSA	11	120	10	1	142
Huntsville MSA	0	46	3	0	49
Daphne MSA	0	27	3	0	30
Montgomery MSA	11	22	3	0	36
AL Non-MSA	0	47	0	0	47
Mobile MSA	0	24	0	0	24
Auburn MSA	1	23	0	0	24
Tuscaloosa MSA	0	5	2	0	7
Florence MSA	0	9	0	0	9
Anniston MSA	2	16	0	0	18
Dothan MSA	0	0	0	0	0
Gadsden MSA	0	4	0	0	4
State-wide Activities	0	9	0	0	9
<b>Total</b>	<b>25</b>	<b>352</b>	<b>21</b>	<b>1</b>	<b>399</b>

Source: Bank Records

## BIRMINGHAM MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BIRMINGHAM MSA ASSESSMENT AREA

The Birmingham MSA assessment area consists of all 6 counties within the Birmingham-Hoover, AL MSA. The bank operates 19, or 33.3 percent, of its Alabama branch offices in the Birmingham MSA assessment area. The assessment area also represents 32.9 percent of the rated-area loans by dollar volume, 31.4 percent of rated-area lending by number of loans, and 36.0 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels noted in the moderate-income census tracts. Levels in the low-income census tracts are significantly less. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.1 million, and the number of census tracts increased to 304. Regarding housing costs, the median housing value increased to \$186,214, and the median gross rent increased to \$918. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Birmingham MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	246	12.6	26.8	30.9	28.9	0.8
Population by Geography	1,072,553	8.9	24.7	32.6	33.4	0.4
Housing Units by Geography	474,424	10.3	26.0	32.3	31.1	0.3
Owner-Occupied Units by Geography	284,224	5.1	21.7	35.2	37.9	0.0
Occupied Rental Units by Geography	128,298	18.1	31.5	26.7	22.8	0.9
Vacant Units by Geography	61,902	18.3	34.1	30.4	16.8	0.5
Businesses by Geography	81,643	7.1	22.4	28.7	40.5	1.3
Farms by Geography	1,914	3.1	21.2	32.0	43.2	0.5
Family Distribution by Income Level	276,210	23.6	15.7	18.7	42.1	0.0
Household Distribution by Income Level	412,522	25.2	15.6	16.2	43.1	0.0
Median Family Income - Birmingham-Hoover, AL MSA	\$63,259	Median Housing Value				\$162,830
		Median Gross Rent				\$809
		Families Below Poverty Level				12.7%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Birmingham MSA assessment area was 2.5 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were University of Alabama Birmingham, Brookwood Baptist Health, Regions Financial Corporation, Honda Manufacturing, and St. Vincent's Health System.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 46 FDIC-insured institutions operated 290 branches within this area. Of these institutions, Truist ranked 7<sup>th</sup> in total deposits with a market share of 3.3 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Birmingham MSA assessment area. Both contacts identified the need for small business funding. One contact specifically identified lending needs for minority-owned businesses, as well as financial literacy. The other contact identified a need for affordable housing.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.3 percent of the families are low- or moderate-income. The community contacts confirmed small business and affordable housing lending were needed.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BIRMINGHAM MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Birmingham MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and exceeded aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 82.4 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Birmingham MSA assessment area. The bank originated 32 community development loans totaling \$86.2 million. This amount represents 39.5 percent by number and 21.4 percent by dollar volume of total community development loans originated in Alabama. Regarding the community development purpose, 1 loan supported affordable housing, 3 loans supported community services, 26 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans totaling \$27.2 million for a commercial entity to expand business operations, which will create approximately 150 to 200 jobs, including jobs for low- and moderate-income persons.
- two loans totaling \$6.2 million to support the rehabilitation of a vacant building to provide commercial space for businesses in a moderate-income geography designated as an Opportunity Zone, which also promotes job creation.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Birmingham MSA assessment area. Qualified investments total \$30.9 million, or 0.5 percent, of bank-wide qualified investments which exceeds the percent of deposits at 0.4 but is below the percent of branches of 0.9 in this assessment area. Investments included 13 new investments for \$22.2 million, 2 prior-period investments for \$7.4 million, and 57 grants totaling \$1.3 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$6.1 million in LIHTCs to fund the development of a multifamily apartment that supports affordable housing in the assessment area. The development is located in a low-income census tract and is limited to families earning less than 40 percent of the area median income. All units are also subsidized under the HUD Section 8 program.
- \$1.4 million in SBA bonds that support local small business economic development through the SBA's 504 program in the assessment area.
- \$4.9 million in NMTCs to fund the development of a grade school in a highly distressed and underserved community in the assessment area. The school is also located in a designated Opportunity Zone and supports community service.
- \$1.3 million in an affordable housing fund that buys, renovates, and rents to low- and moderate-income families in the assessment area.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 6 low-income and 12 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	26	8.6	65,637	5.9	2	10.5	0	0.0	0	0.0
Moderate	79	26.0	251,331	22.5	4	21.1	0	0.0	0	0.0
Middle	111	36.5	425,078	38.1	6	31.6	0	0.0	0	0.0
Upper	80	26.3	357,227	32.0	7	36.8	0	0.0	1	100.0
NA	8	2.6	16,016	1.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>304</b>	<b>100.0</b>	<b>1,115,289</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in an upper-income census tract during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 142 community development services. This performance represents 35.6 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 33.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that specializes in community and organizational development strategies to improve the lives of low-income individuals with special needs.
- A bank employee serves on the Board of a non-profit organization with the mission to provide economic development opportunities in low- and moderate-income areas in the assessment area.
- A bank employee serves on the Board of a non-profit organization with the mission to provide affordable capital and outcome-oriented training for disadvantaged small business owners that serve low- and moderate-income communities.



## HUNTSVILLE MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HUNTSVILLE MSA ASSESSMENT AREA

The Huntsville MSA assessment area consists of both counties within the Huntsville, AL MSA. The bank operates six, or 10.5 percent, of its Alabama branch offices in the Huntsville MSA assessment area. The assessment area also represents 17.6 percent of the rated-area loans by dollar volume, 13.0 percent of bank-wide lending by number of loans, and 9.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are well disbursed among the moderate-, middle-, and upper-income census tracts with significantly lower levels in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 491,723, and the number of census tracts increased to 118. Regarding housing costs, the median housing value increased to \$187,628, and the median gross rent increased to \$881. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Huntsville MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	89	13.5	32.6	29.2	24.7	0.0
Population by Geography	435,243	8.6	26.7	32.4	32.4	0.0
Housing Units by Geography	188,077	10.0	27.8	32.5	29.7	0.0
Owner-Occupied Units by Geography	117,889	4.0	24.5	33.8	37.7	0.0
Occupied Rental Units by Geography	52,091	20.4	34.3	30.0	15.3	0.0
Vacant Units by Geography	18,097	18.7	30.9	31.2	19.2	0.0
Businesses by Geography	32,363	10.4	25.4	30.0	34.2	0.0
Farms by Geography	1,107	5.6	27.2	37.9	29.3	0.0
Family Distribution by Income Level	112,844	23.8	16.9	17.3	41.9	0.0
Household Distribution by Income Level	169,980	25.2	15.8	15.9	43.0	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$72,576	Median Housing Value			\$160,520
			Median Gross Rent			\$772
			Families Below Poverty Level			10.3%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Huntsville MSA assessment area was 2.2 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, government, and manufacturing. The top employers were United States Army/Redstone Arsenal, Huntsville Hospital, NASA/Marshall Space Flight Center, The Boeing Company, and Science Applications International Corporation. In 2021, Mazda Toyota Manufacturing completed the construction of a new automotive plant, which created over 3,700 jobs for the Huntsville area.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 33 FDIC-insured institutions operated 114 branches within this area. Of these institutions, Truist ranked 9<sup>th</sup> in total deposits with a market share of 3.6 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from an economic development organization was referenced within the Huntsville MSA assessment area. The contact indicated a need for affordable housing for low- and moderate-income individuals.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.7 percent of the families are low- or moderate-income. The community contact also provided the need for affordable housing loans.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HUNTSVILLE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Huntsville MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with both demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending performance in low- and moderate-income census tracts exceeded demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with both demographic and aggregate lending data. Lending in moderate-income census tracts was below demographic data but consistent with aggregate lending data. In 2022, lending in low-income census tracts increased to 16.6 percent, which exceeded demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, lending performance exceeded aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 86.9 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Huntsville MSA assessment area. The bank originated 12 community development loans totaling \$50.4 million. This amount represents 14.8 percent by number and 12.5 percent by dollar volume of total community development loans originated in Alabama. Regarding the community development purpose, 4 loans supported affordable housing, 3 loans supported community services, 3 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$5.0 million construction loan in addition to a \$4 million loan to renovate an unused building in a moderate-income geography, which will provide space for a new medical clinic and produce market.
- \$16.6 million loan to fund a mixed-use retail and housing development project that is part of a community redevelopment and revitalization plan, which will help attract new and retain existing residents and businesses in a moderate-income geography.

## **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Huntsville MSA assessment area. Qualified investments total \$14.9 million, or 0.3 percent of bank-wide qualified investments, which exceeds the percent of deposits at 0.1 and is comparable to the percent of branches of 0.3 in this assessment area. Investments included 5 new investments for \$9.4 million, 1 prior-period investment for \$5.2 million, and 15 grants totaling \$333,300. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$2.7 million in LIHTCs to fund the refinance and rehabilitation of a 308-unit affordable multifamily apartment in the assessment area.
- 3 NMTC investments of \$1.4 million, \$2.1 million, and \$1.4 million to fund the revitalization and renovation of a Historically Black College or University in a low-income census tract. The project will construct/renovate 3 separate buildings including a health clinic, fresh food market, and music hall for low-income students. The initiative will also create 20 new permanent positions and retain 25 positions for low-income workers.
- \$1.8 million in LIHTCs to fund the construction of 278-unit affordable development in the assessment area. The project is part of a new mixed-use development located in an Opportunity Zone.
- \$40,000 grant to a foundation that supports economic development in the assessment area. The grant will aid, in part, 100 minority-owned and other small businesses in start-up, revitalization, and scaling.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts; however, the branch distribution in moderate-income census tracts is more than twice the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 12 low-income and 14 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	15	12.7	57,417	11.7	0	0.0	0	0.0	0	0.0
Moderate	27	22.9	93,551	19.0	3	50.0	0	0.0	0	0.0
Middle	35	29.7	159,681	32.5	0	0.0	0	0.0	0	0.0
Upper	40	33.9	178,421	36.3	3	50.0	0	0.0	1	100.0
NA	1	0.8	2,653	0.5	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>118</b>	<b>100.0</b>	<b>491,723</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in an upper-income census tract during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 49 community development services. This performance represents 12.3 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 10.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that advocates for community service organizations that serve low- and moderate-income individuals.
- Several bank employees provided financial literacy training at various events to low- and moderate-income students.
- Several bank employees provided technical assistance to small business owners. The technical assistance included support for merchant services and borrowing solutions.

## DAPHNE MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DAPHNE MSA ASSESSMENT AREA

The Daphne MSA assessment area consists of the sole county in the Daphne-Fairhope-Foley, AL MSA. The bank operates five, or 8.8 percent, of its Alabama branch offices in the Daphne MSA assessment area. The assessment area also represents 10.7 percent of the rated-area loans by dollar volume, 10.3 percent of rated-area lending by number of loans, and 3.7 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that the owner-occupied housing units and businesses are within middle-income census tracts with comparable levels within the moderate- and upper-income tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 231,767, and the number of census tracts increased to 44. Regarding housing costs, the median housing value significantly increased to \$254,050, and the median gross rent increased to \$1,033. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Daphne MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	32	0.0	18.8	62.5	15.6	3.1
Population by Geography	195,121	0.0	16.4	64.6	19.0	0.0
Housing Units by Geography	106,422	0.0	19.3	59.9	20.8	0.0
Owner-Occupied Units by Geography	52,997	0.0	14.9	65.0	20.1	0.0
Occupied Rental Units by Geography	21,107	0.0	21.8	61.1	17.1	0.0
Vacant Units by Geography	32,318	0.0	25.0	50.8	24.3	0.0
Businesses by Geography	18,823	0.0	19.2	59.6	21.2	0.0
Farms by Geography	633	0.0	19.6	62.2	18.2	0.0
Family Distribution by Income Level	50,276	20.6	17.7	20.9	40.9	0.0
Household Distribution by Income Level	74,104	24.0	16.2	18.6	41.2	0.0
Median Family Income - Daphne-Fairhope-Foley, AL MSA		\$62,271	Median Housing Value			\$184,430
			Median Gross Rent			\$894
			Families Below Poverty Level			9.6%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Daphne MSA assessment area was 2.5 percent.

In 2022, according to Moody's Analytics, the top industries were leisure and hospitality services, retail trade, and education and health services. The top employers were Walmart Incorporated, Infirmity Health, Collins Aerospace, Columbia Southern University, and South Baldwin Regional Medical Center.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 26 FDIC-insured institutions operated 85 branches within this area. Of these institutions, Truist ranked 12<sup>th</sup> in total deposits with a market share of 2.5 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from a non-profit organization was referenced within the Daphne MSA assessment area. The contact indicated that Baldwin County is the fastest growing county in Alabama, but there is a shortage of workers. The contact identified a need for financial literacy.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.3 percent of the families are low- or moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE DAPHNE MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Daphne MSA assessment area reflects excellent responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect excellent responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the

assessment area. Lending in moderate-income census tracts exceeded both demographic and aggregate lending data. There are no low-income census tracts within the assessment area.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in moderate-income census tracts was consistent with both demographic and aggregate lending data. In 2020, lending performance was consistent with demographic data but exceeded aggregate lending data. In 2022, lending performance exceeded demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and exceeded aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but almost doubled the aggregate lending data. In 2022, performance increased to 87.4 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Daphne MSA assessment area. The bank originated five community development loans totaling \$160.6 million. This amount represents 6.2 percent by number and 39.8 percent by dollar volume of total community development loans originated in Alabama. Regarding the community development purpose, three loans supported economic development and two loans supported revitalization or stabilization. Examples of community development lending follow.

- \$150.0 million loan to fund construction of new school buildings in a moderate-income geography along with other public safety facility improvements, which will also provide new employment opportunities for low- and moderate-income persons.
- \$6.0 million line-of-credit increase to a municipality to finance expenses related to disaster recovery cleanup following a major disaster declaration.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Daphne MSA assessment area. Qualified investments total \$5.0 million, or 0.1 percent of bank-wide qualified investments, which exceeds the percent of deposits at 0.0 but is below the percent of branches of 0.2 in this assessment area. Investments included one new investment for \$2.1 million, one prior-period investment for \$2.8 million, and six grants totaling \$67,500. Most of the qualified investments



support affordable housing in the assessment area. Examples are provided below.

- \$2.1 million in LIHTCs to fund the refinance and rehabilitation of a 100-unit affordable multifamily housing development in the assessment area. The development is restricted to households earning 60 percent or less of the area medium income.
- \$2.8 million prior-period investment in LIHTCs for the new construction of affordable senior citizen housing. The project is restricted to households earning 60 percent or less of the area median income.
- \$25,000 grant to a local non-profit organization that supports the homeless and families living below the poverty level in the assessment area. Programs include food distribution, clothing, and other essential resources.
- \$10,000 grant to a non-profit organization that supports community service through Volunteer Income Tax Assistance. The funds will be used to expand their tax assistance and financial education programs for low- and moderate-income persons.

**SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank did not open or close any branches during the evaluation period. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

**Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank does not have any branches in moderate-income census tracts; however, branches in middle-income census tracts serve approximately three moderate-income tracts. The assessment area does not have any low-income census tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	20.5	40,735	17.6	0	0.0	0	0.0	0	0.0
Middle	24	54.5	134,398	58.0	5	100.0	0	0.0	0	0.0
Upper	9	20.5	54,920	23.7	0	0.0	0	0.0	0	0.0
NA	2	4.5	1,714	0.7	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>44</b>	<b>100.0</b>	<b>231,767</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 30 community development services. This performance represents 7.5 percent of all activities in the state, which is consistent with the assessment area's share of state-wide branches at 8.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides programs and services that promote and create self-sufficiency for low- and moderate-income individuals and families.
- A bank employee serves on the Board of a non-profit organization with the mission to increase economic development opportunities in low- and moderate-income communities.
- Several bank employees provided financial literacy training at various events to low- and moderate-income residents of the assessment area.

## MONTGOMERY MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MONTGOMERY MSA ASSESSMENT AREA

The Montgomery MSA assessment area consists of all four counties within the Montgomery, AL MSA. The bank operates six, or 10.5 percent, of its Alabama branch offices in the Montgomery MSA assessment area. The assessment area also represents 5.0 percent of the rated-area loans by dollar volume, 7.7 percent of rated-area lending by number of loans, and 6.9 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels in the moderate-income census tracts. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 386,047, and the number of census tracts increased to 112. Regarding housing costs, the median housing value increased to \$146,806, and the median gross rent increased to \$913. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Montgomery MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	96	12.5	25.0	33.3	28.1	1.0
Population by Geography	374,864	9.5	21.7	36.1	32.5	0.1
Housing Units by Geography	163,883	9.7	23.3	35.9	31.0	0.2
Owner-Occupied Units by Geography	92,690	6.4	19.2	37.2	37.1	0.0
Occupied Rental Units by Geography	50,171	13.7	28.3	34.5	23.2	0.4
Vacant Units by Geography	21,022	14.9	29.2	33.2	22.4	0.3
Businesses by Geography	25,846	7.2	18.4	36.1	34.4	3.9
Farms by Geography	734	4.2	19.6	41.0	34.6	0.5
Family Distribution by Income Level	94,544	24.5	16.1	18.2	41.2	0.0
Household Distribution by Income Level	142,861	25.4	15.2	16.9	42.6	0.0
Median Family Income - Montgomery, AL MSA	\$59,161	Median Housing Value				\$133,960
		Median Gross Rent				\$805
		Families Below Poverty Level				15.3%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Montgomery MSA assessment area was 3.1 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were Maxwell/Gunter Air Force Base, Baptist Health, Hyundai Motor Manufacturing Alabama, ALFA Insurance Corporation, and MOBIS Alabama.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 24 FDIC-insured institutions operated 99 branches within this area. Of these institutions, Truist ranked 10<sup>th</sup> in total deposits with a market share of 3.4 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from a small business development organization was referenced within the Montgomery MSA assessment area. The contact identified a need for small micro-business lending and financial literacy training. The contact indicated that many business owners in the area do not qualify for traditional loans, such as, small business loans and business credit cards.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.6 percent of the families are low- or moderate-income. The community contact also stated a need for small business lending.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MONTGOMERY MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Montgomery MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and originated an adequate level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Small business loans received greater weight than home mortgage loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is adequate. The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic lending data but consistent with aggregate lending data. In 2022, lending in moderate-income census tracts was consistent with demographic lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below both demographic and aggregate lending data. Lending in moderate-income census tracts was consistent with demographic lending data and exceeded aggregate lending data. However, in 2022, lending performance slightly decreased and was below the demographic lending data. In 2020, lending performance in both low- and moderate-income census tracts was consistent with both demographic and aggregate lending data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and exceeded aggregate lending data. Lending to moderate-income borrowers exceeded both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance exceeded demographic data and was more than double the aggregate lending data.

### **Community Development Loans**

Truist made an adequate level of community development loans in the Montgomery MSA assessment area. The bank originated six community development loans totaling \$7.3 million. This amount represents 7.4 percent by number and 1.8 percent by dollar volume of total community development loans originated in Alabama. Regarding the community development purpose, five loans supported economic development and one loan supported revitalization or stabilization. All 6 community development loans totaling \$7.3 million were made to small businesses or non-profit organizations to promote job retention for low- or moderate-income persons or within low- or moderate-income geographies. These loans were originated through the SBA's PPP during 2020 and 2021.

### **INVESTMENT TEST**

The level of investments and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has an excellent level of qualified investments and grants in the Montgomery MSA assessment area. Qualified investments total \$11.3 million, or 0.2 percent of bank-wide qualified investments, which exceeds the percent of deposits at 0.1 but is below the percent of branches of 0.3 in this assessment area. Investments included 5 new investments for \$3.8 million, 1 prior-period investment for \$7.3 million, and 9 grants totaling \$206,700. Most of the qualified investments support economic development in the assessment area. Examples are provided below.

- 5 new SBA bond investments for \$3.8 million. The bonds support economic development by providing SBA 504 funding with government guaranties to small businesses in the assessment area.
- \$7.3 million prior-period investment in LIHTCs for the construction of a 62-unit affordable senior citizen housing development. The project is restricted to households earning 60 percent or less of the area median income.
- \$10,000 grant to a local non-profit organization that provides job service and other self-sufficiency training to unemployed ex-felons living below the poverty level in the assessment area.
- \$100,000 grant to a non-profit organization that supports economic development through a small business emergency relief fund. The funds will help curb job loss and permanent small business closures in the assessment area.

### **SERVICE TEST**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank did not open or close any branches during the evaluation period. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 8 low-income and 15 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12	10.7	26,319	6.8	0	0.0	0	0.0	0	0.0
Moderate	28	25.0	98,724	25.6	1	16.7	0	0.0	0	0.0
Middle	43	38.4	152,334	39.5	1	16.7	0	0.0	0	0.0
Upper	27	24.1	106,233	27.5	3	50.0	0	0.0	0	0.0
NA	2	1.8	2,437	0.6	1	16.7	0	0.0	0	0.0
<b>Totals</b>	<b>112</b>	<b>100.0</b>	<b>386,047</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 36 community development services. This performance represents 9.0 percent of all activities in the state, which is consistent with the assessment area’s share of state-wide branches at 10.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides resources for wellness, finance, education, and career development for low- and moderate-income individuals.
- A bank employee serves on the Board of a non-profit organization that advocates for job creation, economic development, and workforce development for small businesses.
- Several bank employees provided financial literacy training at various events to low- and moderate-income residents of the assessment area.

## OTHER ALABAMA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
AL Non-MSA	Consistent	Consistent	Below
Mobile MSA	Below	Consistent	Consistent
Auburn MSA	Consistent	Consistent	Consistent
Tuscaloosa MSA	Below	Consistent	Below
Florence MSA	Consistent	Below	Consistent
Anniston MSA	Consistent	Consistent	Consistent
Dothan MSA	Consistent	Consistent	Below
Gadsden MSA	Below	Below	Below

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution, with the exceptions of the AL Non-MSA, Dothan MSA, and Gadsden MSA assessment areas, which are below. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### AL Non-MSA Assessment Area

The AL Non-MSA assessment area consists of Butler, Chambers, Clay, Conecuh, Covington, Crenshaw, Dale, Escambia, Jackson, Marshall, Pike, Tallapoosa, and Walker Counties. Truist operates eight branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.



<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	616	\$25.8 million
Home Mortgage Loans	514	\$94.0 million
Small Farm Loans	5	\$165 thousand
Community Development Loans	5	\$23.2 million
Investments (New)	4	\$6.0 million
Investments (Prior Period)	1	\$4.1 million
Donations	4	\$115 thousand
CD Services	47	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the AL Non-MSA assessment area are in Appendix D.

### **Mobile MSA Assessment Area**

The Mobile MSA assessment area consists of Mobile and Washington Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	536	\$45.5 million
Home Mortgage Loans	476	\$100.5 million
Small Farm Loans	0	\$0
Community Development Loans	5	\$15.8 million
Investments (New)	4	\$2.8 million
Investments (Prior Period)	0	\$0
Donations	9	\$203 thousand
CD Services	24	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Mobile MSA assessment area are in Appendix D.

### **Auburn MSA Assessment Area**

The Auburn MSA assessment area consists of Lee County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	319	\$18.4 million
Home Mortgage Loans	595	\$157.2 million
Small Farm Loans	1	\$20 thousand
Community Development Loans	5	\$45.1 million
Investments (New)	4	\$3.4 million
Investments (Prior Period)	0	\$0
Donations	3	\$25 thousand
CD Services	24	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Auburn MSA assessment area are in Appendix D.

### **Tuscaloosa MSA Assessment Area**

The Tuscaloosa MSA assessment area consists of Greene, Hale, Pickens, and Tuscaloosa Counties. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	319	\$23.3 million
Home Mortgage Loans	453	\$131.7 million
Small Farm Loans	4	\$1.2 million
Community Development Loans	0	\$0
Investments (New)	4	\$1.0 million
Investments (Prior Period)	0	\$0
Donations	0	\$0
CD Services	7	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Tuscaloosa MSA assessment area are in Appendix D.

### **Florence MSA Assessment Area**

The Florence MSA assessment area consists of Colbert and Lauderdale Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	150	\$3.0 million
Home Mortgage Loans	408	\$71.6 million
Small Farm Loans	4	\$1.1 million
Community Development Loans	3	\$1.8 million
Investments (New)	1	\$755 thousand
Investments (Prior Period)	0	\$0
Donations	9	\$83 thousand
CD Services	9	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Florence MSA assessment area are in Appendix D.

### **Anniston MSA Assessment Area**

The Anniston MSA assessment area consists of Calhoun County. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	232	\$16.2 million
Home Mortgage Loans	287	\$39.2 million
Small Farm Loans	0	\$0
Community Development Loans	2	\$600 thousand
Investments (New)	1	\$953 thousand
Investments (Prior Period)	1	\$1.8 million
Donations	2	\$11 thousand
CD Services	18	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Anniston MSA assessment area are in Appendix D.

### Dothan MSA Assessment Area

The Dothan MSA assessment area consists of Geneva, Henry, and Houston Counties. Truist does not operate any branches in this assessment area but maintains a deposit taking ATM. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	154	\$4.8 million
Home Mortgage Loans	131	\$35.7 million
Small Farm Loans	0	\$0
Community Development Loans	0	\$0
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	1	\$5 thousand
CD Services	0	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Dothan MSA assessment area are in Appendix D.

### Gadsden MSA Assessment Area

The Gadsden MSA assessment area consists of Etowah County. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	124	\$11.5 million
Home Mortgage Loans	144	\$23.9 million
Small Farm Loans	2	\$80 thousand
Community Development Loans	3	\$4.5 million
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	2	\$10 thousand
CD Services	4	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Gadsden MSA assessment area are in Appendix D.

## NEW JERSEY

### CRA RATING FOR NEW JERSEY: SATISFACTORY

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW JERSEY

The evaluation of the New Jersey performance considered the operations of Truist in 5 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 23, or 1.1 percent, of its total branch offices in New Jersey. New Jersey accounts for 0.6 percent of the bank-wide deposits, 2.2 percent of bank-wide loans by dollar volume, and 1.5 of bank-wide lending by number of loans. Overall, Truist ranks 25<sup>th</sup> in the state in deposit market share at 0.6 percent. Competitor institutions in the New Jersey assessment areas include Bank of America, N.A., TD Bank, N.A., and Wells Fargo Bank, N.A.

### SCOPE OF EVALUATION – NEW JERSEY

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the New Brunswick and the Camden MD assessment areas. Limited scope areas include the Atlantic City, Vineland, and Trenton MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN NEW JERSEY

#### LENDING TEST

The Lending Test is rated Outstanding for New Jersey. Lending levels reflect good responsiveness to the New Jersey assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the New Jersey assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each New Jersey assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of both home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent overall good performance in both full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of both home mortgage and small business loans is excellent among borrowers of different income levels and businesses of different sizes. Consistent excellent performance in both full-scope assessment areas supports the conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in New Jersey. During this evaluation period, the bank originated 76 community development loans totaling \$153.4 million. This performance represents 1.1 percent by number and 1.0 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 19 community development loans totaling \$48.6 million were made.

Since the previous evaluation, Truist has originated 17 loans totaling \$46.9 million outside of the assessment areas but within New Jersey. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these community development loans follow.

- \$2.0 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business loan helped to retain jobs for low- and moderate-income individuals.
- \$2.6 million loan for the acquisition of a commercial property that created permanent jobs, including employment opportunities for low- and moderate-income individuals. The loan was originated in partnership with a CDFI, including use of the SBA 504 loan program.

Performance was consistent in the full-scope assessment areas. The analysis for each full-scope New Jersey assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in New Jersey. The level of investments is significant, and the responsiveness to community needs is good. In addition, the bank occasionally uses of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in New Jersey. The bank provided 57 qualified investments for \$10.7 million. This represents 0.2 percent of bank-wide qualified investments, which is below the 1.1 percent of branches and 0.6 percent of deposits in the state. Of the

total qualified investments, 5 were new investments for \$7.6 million, 1 was a prior-period investment for \$1.6 million, and 51 were grants for \$1.5 million. The bulk of qualified investments in New Jersey supports affordable housing.

On a state-wide level, the bank provided 5 grants for \$203,325 to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in New Jersey. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

### **Responsiveness to Credit and Community Development Needs**

The bank exhibits good responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and community service. These needs were identified by community contacts, demographic data, and the bank's supported research presented to examiners in CRA self-assessments. The bank responded to most identified needs.

### **Community Development Initiatives**

The bank occasionally uses complex investments to support community development initiatives in the form of SBIC and housing tax credits in the state. These investments fill funding gaps for affordable housing and small businesses that normally would not qualify for conventional financing. While the investments are not considered innovative, the bank makes efforts to tailor their investments and grants to identified needs in the state.

## **SERVICE TEST**

The Service Test is rated Low Satisfactory for New Jersey. Delivery systems are accessible to limited portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the assessment areas. Truist operates 23 branches in New Jersey, which represents 1.1 percent of bank-wide branches. Overall, the bank did not have any branches in low-income census tracts, while the branch distribution in moderate-income census tracts is well below the percent of the population in the respective tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the bank's branch distribution by tract income level in New Jersey.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	88	8.1	369,137	8.0	0	0.0	0	0.0	0	0.0
Moderate	217	20.1	900,615	19.6	2	8.7	0	0.0	0	0.0
Middle	455	42.1	1,946,763	42.4	12	52.2	0	0.0	1	33.3
Upper	303	28.0	1,355,874	29.5	9	39.1	0	0.0	2	66.7
NA	18	1.7	20,643	0.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>1,081</b>	<b>100.0</b>	<b>4,593,032</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank did not open or close any branches in low- and moderate-income areas.

### **Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 147 community development services since the last evaluation. This performance represents 1.1 percent of bank-wide activities, which is consistent with the state-wide share of branches at 1.1 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. The following table details the number of community development services, by assessment area and community development purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
New Brunswick MD	0	15	0	0	15
Camden MD	3	61	11	0	75
Vineland MSA	2	22	1	0	25
Atlantic City MSA	0	9	2	0	11
Trenton MSA	2	18	1	0	21
<b>Total</b>	<b>7</b>	<b>125</b>	<b>15</b>	<b>0</b>	<b>147</b>

*Source: Bank Records*



## NEW BRUNSWICK MD ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW BRUNSWICK MD ASSESSMENT AREA

The New Brunswick MD assessment area consists of all four counties within the New Brunswick-Lakewood, NJ MD. The bank operates one, or 4.3 percent, of its New Jersey branch offices in the New Brunswick MD assessment area. The assessment area also represents 73.9 percent of the rated-area loans by dollar volume, 55.0 percent of rated-area lending by number of loans, and 1.6 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.5 million, and the number of census tracts increased to 566. Regarding housing costs, the median housing value increased significantly to \$397,107, and the median gross rent increased to \$1,489. The number of businesses increased to 316,237. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the New Brunswick MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	513	7.2	18.1	46.0	27.7	1.0
Population by Geography	2,373,539	7.6	17.9	44.9	29.7	0.0
Housing Units by Geography	962,424	6.9	19.8	46.4	27.0	0.0
Owner-Occupied Units by Geography	621,817	3.6	17.0	45.8	33.6	0.0
Occupied Rental Units by Geography	231,838	15.5	25.2	46.1	13.2	0.0
Vacant Units by Geography	108,769	6.8	24.2	50.3	18.6	0.1
Businesses by Geography	281,642	6.6	15.5	44.1	33.7	0.0
Farms by Geography	5,834	4.7	15.1	42.5	37.7	0.0
Family Distribution by Income Level	601,947	15.3	13.3	17.7	53.6	0.0
Household Distribution by Income Level	853,655	19.6	13.1	15.9	51.4	0.0
Median Family Income - New Brunswick-Lakewood, NJ MD	\$95,564	Median Housing Value				\$359,370
		Median Gross Rent				\$1,329
		Families Below Poverty Level				6.0%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the New Brunswick MD assessment area was 3.4 percent.

In 2022, according to D&B data, the top industries were services, non-classifiable establishments, and retail trade.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 46 FDIC-insured institutions operated 682 branches within this area. Of these institutions, Truist ranked 39<sup>th</sup> in total deposits with a market share of less than 0.1 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from organizations were referenced within the New Brunswick MD assessment area. One contact noted a need for flexible capital access, especially for minority entrepreneurs and minority- and women-owned businesses. Additionally, affordable housing was noted as a primary credit need.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 28.6 percent of the families are low- or moderate-income. The community contacts confirmed small business lending and affordable housing were needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NEW BRUNSWICK MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the New Brunswick MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. Home mortgage loans received more weight than small business loans when considering the number and dollar volume of these products in the assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Lending in moderate-income census tracts was above demographic and aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was generally consistent with demographic and aggregate lending data. However, in 2020, performance in low-income census tracts was slightly below demographic and aggregate lending data. Furthermore, in 2022, performance in both low- and moderate-income census tracts was slightly below demographic data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families. However, performance was similar to the aggregate lending data. In 2020, lending to low-income borrowers was above aggregate lending data. Lending to moderate-income borrowers significantly exceeded demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was slightly below demographic data but significantly above the aggregate lending data. In 2020, performance was consistent with demographic data.

### **Community Development Loans**

Truist is a leader in making community development loans in the New Brunswick MSA assessment area. The bank originated 11 community development loans totaling \$35.0 million. This amount represents 14.5 percent by number and 22.8 percent by dollar volume of total community development loans originated in New Jersey. Regarding the community development purpose, 1 loan supported affordable housing and 10 loans supported economic development. Examples of community development loans follow.

- two loans totaling \$7.6 million for a commercial entity to acquire a warehouse facility for business operations that will create permanent jobs, including employment opportunities for low- and moderate-income persons. These loans were originated in partnership with a local certified development company, including use of the SBA 504 loan program.
- \$4.2 million loan to develop a LIHTC housing complex providing 97 units of affordable housing for low-income senior citizens, including set-aside units for extremely low-income senior citizens.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is good in the assessment area. In addition, the bank occasionally uses innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the New Brunswick MSA assessment area. Qualified investments total \$2.3 million, or 0.04 percent, of bank-wide qualified investments which exceeds the percent of deposits at 0.01 but is below the percent of branches of 0.1 in this assessment area. Investments included one new investment for \$150,000, one prior-period investment for \$1.6 million, and six grants totaling \$574,314. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$500,000 community service grant to a non-profit organization that assists low- and moderate-income disabled residents with vocational rehabilitation training and other support.
- \$150,000 in a local SBIC that supports economic development by financing small businesses in the assessment area.
- \$50,000 community service grant to a non-profit organization that provides low- and moderate-income incarcerated and formerly incarcerated young adults with essential job training and other life skills.
- \$12,500 grant to a non-profit foundation that provides emergency support services, including food and financial security, to low-income residents of the assessment area.

### **Responsiveness to Credit and Community Development Needs**

The bank exhibits good responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and community service. The bank responded to the economic development and community service needs in this assessment area.

### **Community Development Initiatives**

The bank occasionally uses complex investments to support community development needs in the form of SBIC investments. These investments fill funding gaps for small business deals that normally would not qualify for conventional financing. The investments are not considered innovative in this assessment area.

## **SERVICE TEST**

Delivery systems are accessible to limited portions of the assessment area. There were branch openings or closings during the evaluation period. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the assessment area. The bank does not have any branches in low- or moderate-income census tracts. Further, the branch in the middle-income

census tract does not serve any low- or moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	43	7.6	202,610	8.1	0	0.0	0	0.0	0	0.0
Moderate	112	19.8	502,690	20.2	0	0.0	0	0.0	0	0.0
Middle	241	42.6	1,035,738	41.6	1	100.0	0	0.0	0	0.0
Upper	161	28.4	743,413	29.9	0	0.0	0	0.0	0	0.0
NA	9	1.6	4,916	0.2	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>566</b>	<b>100.0</b>	<b>2,489,367</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 15 community development services. This performance represents 10.2 percent of all activities in the state, which is above the assessment area’s share of state-wide branches at 4.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee collaborated with a Native American non-profit organization to provide a financial education workshop for low- and moderate-income individuals.
- Two bank employees collaborated with a debt collection agency to provide a budgeting workshop for low- and moderate-income individuals.
- Two bank employees facilitated a homeownership class for first-time homeowners. The topics included an overview of budgeting and down-payment assistance programs.

## CAMDEN MD ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CAMDEN MD ASSESSMENT AREA

The Camden MD assessment area consists of all 3 counties within the Camden, NJ MD. The bank operates 13, or 56.5 percent, of its New Jersey branch offices in the Camden MD assessment area. The assessment area also represents 15.4 percent of the rated-area loans by dollar volume, 25.5 percent of rated-area lending by number of loans, and 19.1 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fairly moderate levels in the moderate-income census tracts. Nominal levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 315. Regarding housing costs, the median housing value increased to \$228,192, and the median gross rent increased to \$1,226. The number of businesses increased to 131,954. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Camden MD Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	304	6.3	17.1	51.3	25.0	0.3
Population by Geography	1,252,852	6.4	14.9	49.6	28.8	0.3
Housing Units by Geography	494,271	6.5	16.3	50.2	26.7	0.3
Owner-Occupied Units by Geography	334,575	3.1	12.5	51.8	32.5	0.0
Occupied Rental Units by Geography	120,453	13.0	25.4	46.7	13.9	1.0
Vacant Units by Geography	39,243	14.9	20.9	47.4	16.1	0.7
Businesses by Geography	117,691	3.9	12.7	49.0	34.3	0.1
Farms by Geography	2,808	1.6	9.6	50.4	38.5	0.0
Family Distribution by Income Level	315,592	21.1	17.1	21.4	40.3	0.0
Household Distribution by Income Level	455,028	24.8	15.7	17.6	41.9	0.0
Median Family Income - Camden, NJ MD		\$87,133	Median Housing Value			\$218,478
			Median Gross Rent			\$1,082
			Families Below Poverty Level			7.0%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Camden MD assessment area was 3.9 percent.

In 2022, according to Moody's Analytics, the top industries were education and health services, professional and business services, and government. The top employers were Virtua Health, McGuire-Dix Air Force Base, Cooper Health System, TD Bank Corporation, and Kennedy Health System.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 30 FDIC-insured institutions operated 275 branches within this area. Of these institutions, Truist ranked 12<sup>th</sup> in total deposits with a market share of 1.4 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from a housing agency was referenced within the Camden MD assessment area. The contact identified homebuyer education and financial literacy as primary credit and service needs in the assessment area. The contact noted that the area has available affordable housing; however, the quality of the affordable housing stock is lacking and requires substantial improvements. According to the contact, the underbanked population remains distrustful of financial institutions. The contact believes there are opportunities for local financial institutions to increase collaboration with HUD agencies, such as referring applicants in need of counseling to HUD agencies early in the application process. There are also opportunities for financial institutions to offer more flexible lending programs to assist low-income borrowers with qualifying for loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.2 percent of the families are low- or moderate-income.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN CAMDEN MD ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Camden MD assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. However, in 2020, performance in moderate-income census tracts was below demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was slightly below demographic data but consistent with aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was similar to the aggregate lending data. In 2020, lending to low-income borrowers was above aggregate lending data. Lending to moderate-income borrowers significantly exceeded demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Camden MD assessment area. The bank originated 35 community development loans totaling \$43.9 million. This amount represents 46.1 percent by number and 28.6 percent by dollar volume of total community development loans originated in New Jersey. Regarding the community development purpose, 5 loans supported affordable housing, 5 loans supported community services, 23 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$3.1 million loan to develop a LIHTC housing complex providing 79 units of affordable housing for low-income senior citizens, including set-aside units for extremely low-income senior citizens.
- \$2.2 million refinance loan to a non-profit organization that provides social programs, services, and housing for low- and moderate-income families and senior citizens.



## **INVESTMENT TEST**

The level of investments is significant and responsiveness to community needs is good in the assessment area. In addition, the bank occasionally uses innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Camden MSA assessment area. Qualified investments total \$4.0 million, or 0.1 percent of bank-wide qualified investments, which is comparable to the percent of deposits of 0.1 but below the percent of branches at 0.6 in this assessment area. Investments included 2 new investments for \$3.5 million, no prior-period investments, and 20 grants totaling \$481,056. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$1.5 million in MBSs to provide funding for a 123-unit affordable multifamily development in the assessment area. The property is located in a moderate-income census tract and tenants are restricted to families earning 60 percent or less of the area median income.
- \$1.5 million in a local SBIC that supports economic development by financing small businesses in the assessment area.
- \$30,000 grant to a national non-profit that supports affordable housing for low- and moderate-income families in the assessment area.
- \$10,000 community service grant to a non-profit that provides several support services in the community including food, legal, and financial literacy training.

### **Responsiveness to Credit and Community Development Needs**

The bank exhibits good responsiveness to credit and community economic development needs. Identified needs include affordable housing, economic development, and community service. The bank responded to most of these needs in this assessment area.

### **Community Development Initiatives**

The bank occasionally uses complex investments to support community development needs in the form of MBS and SBIC investments. These investments fill funding gaps for affordable housing and small businesses that normally would not qualify for conventional financing. The investments in this assessment area are not considered innovative.

## **SERVICE TEST**

Delivery systems are accessible to limited portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

**Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the assessment area. The bank does not have any branches in low-income census tracts, and the branch distribution in moderate-income census tracts is well below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately four moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	18	5.7	75,591	5.9	0	0.0	0	0.0	0	0.0
Moderate	64	20.3	235,287	18.3	1	7.7	0	0.0	0	0.0
Middle	148	47.0	601,834	46.7	5	38.5	0	0.0	0	0.0
Upper	83	26.3	370,701	28.8	7	53.8	0	0.0	2	100.0
NA	2	0.6	4,226	0.3	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>315</b>	<b>100.0</b>	<b>1,287,639</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed two branches in upper-income census tracts during the evaluation period.

**Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 75 community development services. This performance represents 51.0 percent of all activities in the state, which is consistent with the assessment area’s share of state-wide branches at 56.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides oversight and planning for workforce readiness for low- and moderate-income individuals.
- A bank employee serves on the Board of a non-profit organization that provides job training and employment services for low- and moderate-income individuals with disabilities.
- A bank employee serves on the Board of a non-profit organization that builds affordable housing for low- and moderate-income individuals and families.

## OTHER NEW JERSEY ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the three New Jersey assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. Conclusions regarding the Investment Test lowered the bank’s performance rating in New Jersey. However, conclusions regarding the Lending and Service Tests did not affect the overall ratings for those tests.

Assessment Area	Lending Test	Investment Test	Service Test
Atlantic City MSA	Below	Below	Exceeds
Vineland MSA	Below	Consistent	Consistent
Trenton MSA	Below	Below	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are below the overall institution. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### Atlantic City MSA Assessment Area

The Atlantic City MSA assessment area consists of Atlantic City County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	585	\$45.7 million
Home Mortgage Loans	402	\$133.8 million
Small Farm Loans	9	\$1.3 million
Community Development Loans	3	\$18.9 million
Investments (New)	1	\$3 thousand
Investments (Prior Period)	0	\$0
Donations	7	\$77 thousand
CD Services	11	--

#### Geographic Distribution and Borrower Profile

Tables containing lending data for the Atlantic City MSA assessment area are in Appendix D.

### **Vineland MSA Assessment Area**

The Vineland MSA assessment area consists of Cumberland County. Truist operates five branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	545	\$46.1 million
Home Mortgage Loans	229	\$27.5 million
Small Farm Loans	13	\$1.3 million
Community Development Loans	9	\$7.2 million
Investments (New)	1	\$4.0 million
Investments (Prior Period)	0	\$0
Donations	6	\$42 thousand
CD Services	25	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Vineland MSA assessment area are in Appendix D.

### **Trenton MSA Assessment Area**

The Trenton MSA assessment area consists of Mercer County. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	342	\$10.0 million
Home Mortgage Loans	320	\$106.7 million
Small Farm Loans	-	-
Community Development Loans	1	\$1.5 million
Investments (New)	0	\$0
Investments (Prior Period)	0	\$0
Donations	7	\$130 thousand
CD Services	21	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Trenton MSA assessment area are in Appendix D.

## WEST VIRGINIA

### CRA RATING FOR WEST VIRGINIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

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

The evaluation of the West Virginia performance considered the operations of Truist in seven assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 38, or 1.8 percent, of its total branch offices in West Virginia. West Virginia accounts for 0.8 percent of bank-wide loans by dollar volume, 1.1 percent of bank-wide lending by number of loans, and 1.4 percent of the bank-wide deposits. Overall, Truist ranks 1<sup>st</sup> in the state in deposit market share at 14.7 percent. Competitor institutions in the West Virginia assessment areas include United Bank, Wesbanco Bank, Inc., and City National Bank of West Virginia.

### SCOPE OF EVALUATION – WEST VIRGINIA

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews the WV Non-MSA, Charleston MSA, and Morgantown MSA assessment areas. Limited scope areas include the Huntington, Beckley, Wheeling, and Parkersburg MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN WEST VIRGINIA

#### LENDING TEST

The Lending Test is rated High Satisfactory for West Virginia. Lending levels reflect good responsiveness to the West Virginia assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and small businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans. Performance is generally consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the West Virginia assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each West Virginia assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of both home mortgage and small business loans reflects good penetration throughout the assessment areas. Consistent overall good performance in each of the three full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of small business loans is excellent among businesses of different sizes for all full-scope assessment areas. The borrower distribution of home mortgage loans is good among borrowers of different income levels in each full-scope assessment area. Overall excellent performance in the Charleston MSA and Morgantown MSA assessment areas and good performance in WV Non-MSA assessment area supports this conclusion.

### **Community Development Loans**

Truist is a leader in making community development loans in West Virginia. During this evaluation period, the bank originated 125 community development loans totaling \$116.0 million. This performance represents 1.7 percent by number and 0.7 percent by dollar volume of bank-wide community development loans. Community development lending volume is similar to the prior evaluation, when 97 community development loans totaling \$112.8 million were made.

Since the previous evaluation, Truist has originated 5 loans totaling \$3.3 million outside of the assessment areas but within West Virginia. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these loans are provided below.

- \$2.7 million loan to a corporation to complete the upfit of a new manufacturing facility that will create permanent jobs, including employment opportunities for low- and moderate-income individuals. The facility is in a distressed middle-income census tract.
- \$48,230 loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business is in a moderate-income census tract.

Performance is consistent among the full-scope assessment areas. The analysis for each full-scope West Virginia assessment area includes a detailed discussion of community development loans.

## **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in West Virginia. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent for each full-scope assessment area.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in West Virginia. The bank provided 213 qualified investments for \$55.2 million. This represents 1.0 percent of bank-wide qualified

investments, which is below the 1.8 percent of branches and 1.4 percent of deposits in the state. Of the total qualified investments, 16 were new investments for \$31.1 million, 12 were prior-period investments for \$20.6 million, and 185 were grants for \$3.5 million. The bulk of qualified investments in West Virginia support affordable housing.

On a state-wide level, the bank provided 20 grants for \$1.1 million to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in West Virginia. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## SERVICE TEST

The Service Test is rated Outstanding for West Virginia. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance in the full-scope assessment areas was generally consistent.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment areas. Truist operates 38 branches in West Virginia, which represents 1.8 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is above the percent of population in the respective tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the bank’s branch distribution by tract income level in West Virginia.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12	3.3	24,707	2.1	2	5.3	0	0.0	0	0.0
Moderate	82	22.4	222,553	18.9	9	23.7	0	0.0	1	25.0
Middle	176	48.1	609,779	51.7	18	47.4	0	0.0	1	25.0
Upper	91	24.9	312,496	26.5	9	23.7	0	0.0	2	50.0
NA	5	1.4	9,930	0.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>366</b>	<b>100.0</b>	<b>1,179,465</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed four branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 286 community development services since the last evaluation. This performance represents 2.2 percent of bank-wide activities, which is above the state-wide share of branches at 1.8 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs. Examples of community development services are provided under each full-scope assessment area; however, West Virginia had 30 community development services that benefited the entire state. The following are examples of community development services that benefit the entire state.

- A bank employee serves on the Board of an economic development organization with a mission to attract, retain, and expand small businesses.
- A bank employee serves on the Board of a non-profit organization that facilitates development programs for low- and moderate-income youth.
- A bank employee serves on the Board of an economic development organization that supports entrepreneurs starting small businesses in underserved communities.

The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
WV Non-MSA	9	41	13	1	64
Charleston MSA	2	57	26	1	86
Morgantown MSA	1	6	11	1	19
Huntington MSA	5	25	9	4	43
Beckley MSA	0	0	12	0	12
Wheeling MSA	1	15	2	0	18
Parkersburg MSA	0	6	8	0	14
State-wide Activities	1	9	10	10	30
<b>Total</b>	19	159	91	17	286
<i>Source: Bank Records</i>					



## WV NON-MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE WV NON-MSA ASSESSMENT AREA

The WV Non-MSA assessment area consists of eight counties, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 14, or 36.8 percent, of its West Virginia branch offices in this assessment area. The assessment area also represents 23.9 percent of the rated-area loans by dollar volume, 28.3 percent of rated-area lending by number of loans, and 27.5 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income tracts. Nominal levels are noted in the sole low-income tract. According to the 2020 U.S. Census, slight changes have occurred in the assessment area. Although, the total population decreased to 312,211, the number of census tracts increased to 101. Regarding housing costs, the median housing value increased significantly to \$113,873 and the median gross rent increased to \$687. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the WV Non-MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	90	1.1	15.6	57.8	25.6	0.0
Population by Geography	327,943	0.5	12.1	58.7	28.8	0.0
Housing Units by Geography	156,807	0.5	12.3	59.9	27.3	0.0
Owner-Occupied Units by Geography	99,771	0.1	10.3	60.3	29.3	0.0
Occupied Rental Units by Geography	33,408	1.8	16.1	54.9	27.2	0.0
Vacant Units by Geography	23,628	0.6	15.1	65.6	18.7	0.0
Businesses by Geography	20,149	1.3	12.3	50.2	36.2	0.0
Farms by Geography	690	0.1	6.5	60.4	32.9	0.0
Family Distribution by Income Level	88,760	21.4	16.7	18.8	43.1	0.0
Household Distribution by Income Level	133,179	24.0	15.7	16.1	44.2	0.0
Median Family Income Non-MSAs - WV	\$48,107		Median Housing Value			\$95,370
			Median Gross Rent			\$627
			Families Below Poverty Level			14.7%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate ranged from 3.6 percent to 5.6 percent, with an overall average of 4.3

percent. The average unemployment rate in the WV Non-MSA assessment area was above the state and national averages for all years under review. In 2022, according to D&B, the top industries were services, non-classifiable establishments, and retail trade.

### **Competition**

Competition in this assessment area is moderate. According to FDIC Deposit Market Share data as of June 30, 2022, 27 FDIC-insured institutions operated 109 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 22.8 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. A community contact from an economic development organization was referenced within the WV Non-MSA assessment area. The contact identified a need for affordable housing. Additionally, the contact indicated a need for financial literacy, specifically for small businesses.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.1 percent of the families are low- or moderate-income. The community contact also provided that affordable housing is a need.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WV NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the WV Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in the low-income census tract was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic

data but similar to aggregate lending data. In 2022, performance increased to 15.3 percent.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in the low-income census tract was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below both demographic data and aggregate lending data. In 2020, performance was above aggregate lending and in 2022, performance increased to 13.9 percent.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and aggregate lending data. Lending to moderate-income borrowers was similar to demographic data and above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the WV Non-MSA assessment area. The bank originated 32 community development loans totaling \$28.9 million. This amount represents 25.6 percent by number and 24.9 percent by dollar volume of total community development loans originated in West Virginia. Regarding the community development purpose, 2 loans supported affordable housing, 11 loans supported community services, 15 loans supported economic development, and 4 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$1.2 million line of credit to a medical center that provides health services to primarily low- and moderate-income persons. Further, the medical center operates multiple clinics in moderate-income, distressed, and underserved geographies.
- \$2.0 million line of credit to an entity that provides behavioral health services to primarily low- and moderate-income persons struggling with a mental illness, developmental disability, or addiction recovery.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the WV Non-MSA assessment area. Qualified investments total \$17.5 million, or 0.3 percent, of bank-wide qualified investments which is below the percent of deposits at 0.4 and percent of branches of 0.7 in this

assessment area. Investments include 4 new investments for \$9.7 million, 4 prior-period investments for \$7.5 million, and 22 grants totaling \$246,990. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$3.4 million in LIHTCs for the funding of a 40-unit affordable multifamily housing development. Renters are restricted to households earning 60 percent or below the assessment area median income level.
- \$3.0 million in LIHTCs for the renovation of a 36-unit affordable multifamily housing development. All units have been set aside for families earning less than 60 percent of the area median income.
- \$1.8 million in LIHTCs for the renovation of a 42-unit affordable multifamily housing development. All units have been set aside for households earning less than 60 percent of the area median income.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank provided a relatively high level of community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 1 low-income and 7 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	2	2.0	3,470	1.1	1	7.1	0	0.0	0	0.0
Moderate	23	22.8	65,428	21.0	3	21.4	0	0.0	0	0.0
Middle	47	46.5	153,111	49.0	7	50.0	0	0.0	0	0.0
Upper	29	28.7	90,202	28.9	3	21.4	0	0.0	1	100.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>101</b>	<b>100.0</b>	<b>312,211</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in an upper-income census tract during the evaluation period.

### **Community Development Services**

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 64 community development services. This performance represents 22.4 percent of all activities in the state, which is below the assessment area's share of state-wide branches at 36.8 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides child welfare, behavioral health, and advocacy services for low- and moderate-income children.
- Several bank employees serve on the selection committee for a broadband project. The project will provide broadband access to low-income individuals living in public housing.
- A bank employee serves on the Board of a non-profit organization responsible for assuring the delivery of community based mental health, substance abuse, and behavioral health services for low- and moderate-income individuals.

## CHARLESTON MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHARLESTON MSA ASSESSMENT AREA

The Charleston MSA assessment area consists of all five counties within the Charleston, WV MSA. The bank operates nine, or 23.7 percent, of its West Virginia branch offices in this assessment area. The assessment area also represents 24.5 percent of the rated-area loans by dollar volume, 24.0 percent of rated-area loans by number of loans, and 40.6 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that the majority of owner-occupied housing units and businesses are within middle-income census tracts with fair to good levels in the moderate- and upper-income census tracts. Nominal levels are noted in the two low-income census tracts. According to the 2020 U.S. Census, slight changes have occurred in the assessment area. Although, the total population decreased to 258,859, the number of census tracts increased to 81. Regarding housing costs, the median housing value increased to \$113,475, and the median gross rent increased to \$730. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Charleston MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	75	2.7	22.7	53.3	21.3	0.0
Population by Geography	274,738	1.3	17.8	56.9	24.0	0.0
Housing Units by Geography	131,185	1.7	18.5	56.5	23.3	0.0
Owner-Occupied Units by Geography	82,106	0.8	16.3	57.7	25.2	0.0
Occupied Rental Units by Geography	32,263	3.3	21.1	52.8	22.8	0.0
Vacant Units by Geography	16,816	3.2	24.0	57.7	15.2	0.0
Businesses by Geography	18,983	3.3	12.6	57.6	26.5	0.0
Farms by Geography	415	1.4	13.7	59.5	25.3	0.0
Family Distribution by Income Level	73,209	22.2	17.7	18.8	41.3	0.0
Household Distribution by Income Level	114,369	24.7	15.9	17.6	41.8	0.0
Median Family Income - Charleston, WV MSA	\$54,658	Median Housing Value				\$106,385
		Median Gross Rent				\$655
		Families Below Poverty Level				13.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* ) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Charleston MSA assessment area was 3.8 percent.

In 2022, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. The top employers were Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Association, Frontier Communications, Walmart Incorporated, and Dow Chemical Company.

### **Competition**

Competition in this assessment area is moderate. According to FDIC Deposit Market Share data as of June 30, 2022, 17 FDIC-insured institutions operated 70 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 30.3 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. A community contact from a non-profit organization was referenced within the Charleston MSA assessment area. The contact identified a need for affordable housing in the area, including financing the construction of affordable housing. Additionally, financial literacy is also a need to aid in poverty reduction for the area.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.9 percent of the families are low- or moderate-income. The community contact also stated a need for affordable housing.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHARLESTON MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Charleston MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area. When considering the number and dollar volume of these products in the assessment area greater weight is placed on small business loans.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was similar to both demographic and aggregate lending data. Performance in moderate-income census tracts was below both demographic data and aggregate lending data. However, in 2020 performance in moderate-income census tracts was similar to the aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts is similar to demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below demographic and aggregate lending data. Lending to moderate-income borrowers was similar to both demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Charleston MSA assessment area. The bank originated 36 community development loans totaling \$40.4 million. This amount represents 28.8 percent by number and 34.8 percent by dollar volume of total community development loans originated in West Virginia. Regarding the community development purpose, 16 loans supported community services and 20 loans supported economic development. Examples of community development loans follow.

- \$1.0 million line of credit provided in both 2021 and 2022 to a non-profit organization that provides housing shelters, mentoring programs, and other family support and intervention programs to primarily low- and moderate-income children and families.
- \$250,000 line of credit to a non-profit community service organization that provides job training and employment services for primarily disadvantaged low- and moderate-income individuals.

### **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.



### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Charleston MSA assessment area. Qualified investments total \$21.1 million, or 0.4 percent, of bank-wide qualified investments which is slightly below the percent of deposits of 0.6 and the percent of branches at 0.5 in this assessment area. Investments included 6 new investments for \$15.8 million, 2 prior-period investments for \$4.3 million, and 57 grants for \$1.0 million. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$3.3 million in LIHTCs for the construction of a 24-unit affordable multifamily housing development. All units are restricted to households earning 60 percent or less of the area median income.
- \$2.3 million in LIHTCs for the renovation of a 40-unit affordable multifamily housing development. All units are restricted to households earning 60 percent or less of the area median income.
- \$1.5 million in an SBIC fund that supports economic development by financing small businesses in the assessment area.
- \$60,000 economic development grant to a local foundation that supports small businesses in the assessment area. Programs include counseling, business advisory, small business training, and mentorship.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The bank did not open or close any branches during the evaluation period. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts; however, less than two percent of the population resides in the respective tracts. The branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve two low-income and approximately eight moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	2	2.5	4,401	1.7	0	0.0	0	0.0	0	0.0
Moderate	16	19.8	44,424	17.2	1	11.1	0	0.0	0	0.0
Middle	44	54.3	145,127	56.1	5	55.6	0	0.0	0	0.0
Upper	17	21.0	60,373	23.3	3	33.3	0	0.0	0	0.0
NA	2	2.5	4,534	1.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>81</b>	<b>100.0</b>	<b>258,859</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 86 community development services. This performance represents 30.1 percent of all activities in the state, which is above the assessment area's share of state-wide branches at 23.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that assists low- and moderate-income individuals with meeting the basic needs of food, clothing, and shelter.
- Two bank employees serve on the Board of a non-profit organization that assists low- and moderate-income youth living in crisis. The organization operates a homeless shelter and an independent-living program.
- A bank employee serves on the Board of a non-profit organization that provides donated vehicles to individuals moving from welfare to work, and other low-income individuals needing transportation for employment.

## MORGANTOWN MSA ASSESSMENT AREA - Full-Scope Review

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

The Morgantown MSA assessment area consists of both counties within the Morgantown, WV MSA. The bank operates four, or 10.5 percent, of its West Virginia branch offices in this assessment area. The assessment area also represents 14.6 percent of the rated-area loans by dollar volume, 12.9 percent of rated-area lending by number of loans, and 6.8 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the highest level of owner-occupied housing units and businesses are within middle-income census tracts with good levels in the moderate- and upper-income census tracts. The sole low-income tract contains minimal levels. According to the 2020 U.S. Census, slight changes have occurred in the assessment area. The total population increased to 140,038, and the number of census tracts increased to 39. Regarding housing costs, the median housing value increased significantly to \$197,429, and the median gross rent increased to \$820. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Morgantown MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	32	3.1	25.0	46.9	25.0	0.0
Population by Geography	135,477	1.1	23.3	47.7	27.9	0.0
Housing Units by Geography	59,227	0.5	25.6	48.3	25.7	0.0
Owner-Occupied Units by Geography	31,116	0.0	21.7	50.1	28.2	0.0
Occupied Rental Units by Geography	18,391	1.0	31.7	43.5	23.8	0.0
Vacant Units by Geography	9,720	1.0	26.4	51.3	21.3	0.0
Businesses by Geography	11,289	0.2	22.0	43.2	34.5	0.0
Farms by Geography	338	0.0	22.8	53.0	24.3	0.0
Family Distribution by Income Level	28,075	22.1	16.5	22.0	39.4	0.0
Household Distribution by Income Level	49,507	28.2	13.5	15.4	42.9	0.0
Median Family Income - Morgantown, WV MSA	\$63,745	Median Housing Value				\$156,244
		Median Gross Rent				\$741
		Families Below Poverty Level				10.8%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Morgantown MSA assessment area was 3.3 percent.

In 2022, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. The top employers were West Virginia University, WVU Medicine, Monongalia General Hospital, Morgantown Energy Technology Center, and Mylan Pharmaceuticals.

### **Competition**

Competition in this assessment area is moderate. According to FDIC Deposit Market Share data as of June 30, 2022, 13 FDIC-insured institutions operated 42 branches within this area. Of these institutions, Truist ranked 5<sup>th</sup> in total deposits with a market share of 7.6 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. A community contact from an economic development organization was referenced within the Morgantown MSA assessment area. The contact identified a need for affordable housing in the area. Additionally, there is a need for financing infrastructure and land development.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.6 percent of the families are low- or moderate-income. The community contact also stated a need for affordable housing.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MORGANTOWN MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Morgantown MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. The bank did not originate any loans in the only low-income census tract, which is

consistent with both demographic and aggregate data. Lending in moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts is similar to demographic and aggregate lending data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below demographic data but double aggregate lending data. In 2020, performance was consistent with aggregate data. Lending to moderate-income borrowers was consistent with both demographic and aggregate lending data. In 2020, performance exceeded demographic and aggregate data. In 2022, lending performance at 24.0 percent exceeded demographic data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist is a leader in making community development loans in the Morgantown MSA assessment area. The bank originated 11 community development loans totaling \$9.6 million. This amount represents 8.8 percent by number and 8.3 percent by dollar volume of total community development loans originated in West Virginia. Regarding the community development purpose, 1 loan supported affordable housing, 1 loan supported community services, and 9 loans supported economic development. Examples of community development loans follow.

- \$1.6 million construction loan to a non-profit organization that provides medical, dental, and behavioral health care to primarily low- and moderate-income persons. The organization will use the funds to build a new medical facility.
- two loans totaling \$1.6 million in conjunction with a local economic development authority to finance development of a commercial facility, which is expected to create permanent jobs, including jobs for low- and moderate-income persons.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives in the assessment area.

### **Investment and Grant Activity**

The bank has a significant level of qualified investment and grants in the Morgantown MSA assessment area. Qualified investments total \$3.0 million, or 0.1 percent of bank-wide qualified investments, which is comparable to the percent of deposits of 0.1 but below the percent of

branches at 0.2 in this assessment area. Investments include 1 prior-period investment for \$2.8 million and 23 grants totaling \$239,230. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$2.8 million in prior-period LIHTCs investments that support affordable housing in the assessment area.
- 2 grants for \$27,000 and \$25,000 to a non-profit organization that supports affordable housing. The non-profit organization's primary mission is to repurpose vacant or abandoned property and convert it to affordable housing for low-income residents in the assessment area.
- \$25,000 community service grant to a local non-profit organization. The non-profit organization serves the homeless and extremely low-income residents by meeting emergency food and financial needs and training in job readiness and personal finance.
- \$20,000 community service grant to a local non-profit organization food bank.

## **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank provided a relatively high level of community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The bank does not have any branches in low-income census tracts; however, less than three percent of the population resides in the respective tracts. The branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve one low-income and approximately five moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	1	2.6	3,355	2.4	0	0.0	0	0.0	0	0.0
Moderate	11	28.2	34,172	24.4	1	25.0	0	0.0	0	0.0
Middle	16	41.0	63,540	45.4	2	50.0	0	0.0	0	0.0
Upper	9	23.1	34,533	24.7	1	25.0	0	0.0	1	100.0
NA	2	5.1	4,438	3.2	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>39</b>	<b>100.0</b>	<b>140,038</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in an upper-income census tract during the evaluation period.

### **Community Development Services**

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 19 community development services. This performance represents 6.6 percent of all activities in the state, which is below the assessment area's share of state-wide branches at 10.5 percent. The types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Advisory Board for a planned LIHTC housing project. The project will provide affordable housing and support services for low- and moderate-income single mothers.
- Several bank employees collaborated with a small business development center to provide a budgeting workshop for small business owners.
- Several bank employees collaborated with a non-profit organization to provide a financial literacy course that focused on self-sufficiency for low- and moderate-income individuals.

## OTHER WEST VIRGINIA ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for the four West Virginia assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Huntington MSA	Consistent	Consistent	Consistent
Beckley MSA	Consistent	Consistent	Consistent
Wheeling MSA	Below	Consistent	Consistent
Parkersburg MSA	Consistent	Consistent	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with or above the overall institution. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas will be included in Appendix E.

#### Huntington MSA Assessment Area

The Huntington MSA assessment area consists of Cabell, Putnam, and Wayne Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	657	\$79.6 million
Home Mortgage Loans	525	\$71.7 million
Small Farm Loans	0	\$0
Community Development Loans	22	\$14.7 million
Investments (New)	1	\$298 thousand
Investments (Prior Period)	3	\$2.8 million
Donations	28	\$394 thousand
CD Services	43	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		



### Geographic Distribution and Borrower Profile

Tables containing lending data for the Huntington MSA assessment area are in Appendix D.

#### Beckley MSA Assessment Area

The Beckley MSA assessment area consists of Fayette and Raleigh Counties. Truist operates two branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	590	\$60.2 million
Home Mortgage Loans	394	\$57.2 million
Small Farm Loans	5	\$422 thousand
Community Development Loans	6	\$4.0 million
Investments (New)	1	\$1.4 million
Investments (Prior Period)	0	\$0
Donations	13	\$175 thousand
CD Services	12	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Beckley MSA assessment area are in Appendix D.

#### Wheeling MSA Assessment Area

The Wheeling MSA assessment area consists of Marshall and Ohio Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	239	\$20.5 million
Home Mortgage Loans	491	\$68.7 million
Small Farm Loans	0	\$0
Community Development Loans	13	\$15.1 million
Investments (New)	3	\$1.7 million
Investments (Prior Period)	1	\$2.2 million
Donations	18	\$247 thousand
CD Services	18	--

Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Wheeling MSA assessment area are in Appendix D.

### **Parkersburg MSA Assessment Area**

The Parkersburg MSA assessment area consists of Wirt and Wood Counties. Truist operates three branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	231	\$14.4 million
Home Mortgage Loans	189	\$21.6 million
Small Farm Loans	2	\$501 thousand
Community Development Loans	0	\$0
Investments (New)	1	\$2.3 million
Investments (Prior Period)	1	\$989 thousand
Donations	4	\$86 thousand
CD Services	14	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Parkersburg MSA assessment area are in Appendix D.

## KENTUCKY

### CRA RATING FOR KENTUCKY: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN KENTUCKY

The evaluation of the Kentucky performance considered the operations of Truist in 5 assessment areas, which are detailed in the Description of Assessment Areas. The bank operates 29, or 1.4 percent, of its total branch offices in Kentucky. Kentucky accounts for 0.7 percent of the bank-wide deposits, 0.7 percent of bank-wide loans by dollar volume, and 1.1 percent of bank-wide lending by number of loans. Overall, Truist ranks 4<sup>th</sup> in the state in deposit market share at 6.2 percent. Competitor institutions in the Kentucky assessment areas include PNC Bank, N.A., JP Morgan Chase Bank, N.A., and Fifth Third Bank, N.A.

### SCOPE OF EVALUATION – KENTUCKY

Based on the number of loans and branches, as well as dollar volume of deposits, examiners conducted full-scope reviews of the KY Non-MSA and the Lexington MSA assessment areas. Limited scope areas include the Bowling Green MSA, Owensboro MSA, and Clarksville MSA assessment areas.

### CONCLUSIONS ON PERFORMANCE CRITERIA IN KENTUCKY

#### LENDING TEST

The Lending Test is rated High Satisfactory for Kentucky. Lending levels reflect good responsiveness to the Kentucky assessment areas' credit needs. The geographic distribution reflects good penetration throughout the assessment areas, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans. Overall performance is consistent among the full-scope assessment areas.

#### Lending Activity

Lending levels reflect good responsiveness to the Kentucky assessment areas' credit needs. The tables in Appendix D detail the number and dollar volume of HMDA and CRA loans in 2021 for each Kentucky assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of both home mortgage and small business reflects good penetration throughout the assessment areas. Consistent overall good performance in both full-scope assessment areas supports this conclusion.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes for each full-scope assessment area. The borrower distribution of home mortgage loans is good among borrowers of different income levels in both full-scope assessment areas.

### **Community Development Loans**

Truist made a relatively high level of community development loans in Kentucky. During this evaluation period, the bank originated 45 community development loans totaling \$90.5 million. This performance represents 0.6 percent by number and 0.6 percent by dollar volume of bank-wide community development loans. Community development lending volume is similar to the prior evaluation, when 39 community development loans totaling \$95.2 million were made.

Since the previous evaluation, Truist has originated 9 loans totaling \$22.9 million outside of the assessment areas but within Kentucky. Since the bank has been responsive to community development needs and opportunities within its assessment areas, these loans are considered. Examples of these loans follow.

- \$2.9 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business is in a distressed and underserved middle-income census tract.
- \$1.6 million loan guaranteed by the SBA to fund the operations of a small business during the COVID-19 pandemic. The small business loan helped to retain jobs for low- and moderate-income individuals.

Performance among the full-scope assessment areas varied with the bank considered a leader in the Lexington MSA assessment area. An adequate level of community development loans was originated in the KY Non-MSA assessment area. The analysis for each full-scope Kentucky assessment area includes a detailed discussion of community development loans.

### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in Kentucky. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments. Performance was consistent in the full-scope assessment areas.

## **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in Kentucky. The bank provided 94 qualified investments for \$33.2 million. This represents 0.6 percent of bank-wide qualified investments, which is below the 1.4 percent of branches and 0.7 percent of deposits in the state. Of the total qualified investments, 10 were new investments for \$17.7 million, 9 were prior-period investments for \$13.9 million, and 75 were grants for \$1.6 million. The bulk of qualified investments in Kentucky support affordable housing.

On a state-wide level, the bank provided 5 grants for \$363,350 to organizations with a purpose consistent with the CRA definition of community development. There were no other state-wide investments other than grants in Kentucky. Additional qualified investment information and examples are discussed under each full-scope assessment area benefited.

## **SERVICE TEST**

The Service Test is rated High Satisfactory for Kentucky. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services. Performance varied among the full-scope assessment areas.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. Truist operates 29 branches in Kentucky, which represents 1.4 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is consistent with the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. In addition, the distribution of ATMs is consistent with the branch distribution. The following table reflects the bank's branch distribution by tract income level in Kentucky.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	18	4.4	53,999	3.7	1	3.4	0	0.0	0	0.0
Moderate	105	25.4	344,997	23.9	4	13.8	0	0.0	5	41.7
Middle	187	45.3	662,248	45.9	10	34.5	0	0.0	6	50.0
Upper	88	21.3	353,689	24.5	11	37.9	0	0.0	1	8.3
NA	15	3.6	26,995	1.9	3	10.3	0	0.0	0	0.0
<b>Totals</b>	<b>413</b>	<b>100.0</b>	<b>1,441,928</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed 12 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist is a leader in providing community development services in the state. Bank records show that employees participated in 239 community development services since the last evaluation. This performance represents 1.9 percent of bank-wide activities, which is consistent with the state-wide share of branches at 1.4 percent. Bank employees served in leadership capacities and provided financial expertise to community organizations. The types of services provided reflect excellent responsiveness to the rated-area needs.

In addition to the community development services provided under each full-scope assessment area, 3 services consisted of financial literacy sessions for low- and moderate-income individuals that benefited multiple assessment areas. The other state-wide service involved a bank officer serving on the advisory board of a state-wide small business development center. The following table details the number of community development services, by assessment area and community development purpose.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
KY Non-MSA	1	62	9	3	75
Lexington MSA	3	36	3	0	42
Bowling Green MSA	0	82	5	0	87
Owensboro MSA	0	23	1	0	24
Clarksville MSA	0	7	0	0	7
State-wide Activities	0	3	1	0	4
<b>Total</b>	<b>4</b>	<b>213</b>	<b>19</b>	<b>3</b>	<b>239</b>
<i>Source: Bank Records</i>					

## KY NON-MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KY NON-MSA ASSESSMENT AREA

The KY Non-MSA assessment area consists of 15 counties, as noted in the Description of Assessment Areas section of this evaluation. The bank operates 14, or 48.3 percent, of its Kentucky branch offices in the KY Non-MSA assessment area. The assessment area also represents 24.9 percent of the rated-area loans by dollar volume, 31.0 percent of rated-area lending by number of loans, and 30.0 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the majority of owner-occupied housing units and businesses are within middle-income census tracts. Nominal levels are noted in the 2 low-income census tracts with the remaining levels fairly disbursed between the moderate- and upper-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 173. Regarding housing costs, the median housing value increased to \$111,134, and the median gross rent increased to \$643. The number of businesses increased to 42,233. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the KY Non-MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	139	1.4	23.0	59.0	15.8	0.7
Population by Geography	540,954	1.2	21.3	58.7	18.8	0.0
Housing Units by Geography	255,632	1.1	21.9	58.8	18.3	0.0
Owner-Occupied Units by Geography	149,731	0.9	19.5	58.6	21.1	0.0
Occupied Rental Units by Geography	66,365	1.6	26.3	58.3	13.7	0.0
Vacant Units by Geography	39,536	0.9	23.5	60.3	15.4	0.0
Businesses by Geography	38,192	0.7	16.8	58.9	23.6	0.0
Farms by Geography	1,986	0.2	10.2	62.8	26.7	0.0
Family Distribution by Income Level	143,818	24.7	16.6	18.7	40.1	0.0
Household Distribution by Income Level	216,096	27.5	15.0	16.5	41.0	0.0
Median Family Income Non-MSAs - KY		\$45,986	Median Housing Value			\$95,706
			Median Gross Rent			\$573
			Families Below Poverty Level			18.9%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rates ranged from 3.4 percent to 6.3 percent, with an overall average of 4.7



percent. The average unemployment rate in KY Non-MSA assessment area was above the state average for all years under review. In 2022, according to D&B data, the top industries were services, non-classifiable establishments, and retail trade.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 52 FDIC-insured institutions operated 212 branches within this area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 6.9 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Three community contacts from organizations were referenced within the KY Non-MSA assessment area. Contacts noted the housing market continues to struggle with a lack of affordable housing options and the financing needed to improve the existing rental properties within the area. In addition, contacts noted a need for financial literacy for residents and the need for small-dollar consumer loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 41.3 percent of the families are low- or moderate-income. The community contacts also provided affordable housing as a credit need.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KY NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the KY Non-MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and originated an adequate level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic data but consistent with aggregate lending data. In 2020, the bank did not originate any loans in low-income census tracts, and lending in moderate-income census tracts was below demographic and aggregate lending data. However, in 2022, performance in low- and moderate-income census tracts was consistent with demographic data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and similar to the aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist made an adequate level of community development loans in the KY Non-MSA assessment area. The bank originated eight community development loans totaling \$9.8 million. This amount represents 17.8 percent by number and 10.8 percent by dollar volume of total community development loans originated in Kentucky. Regarding the community development purpose, four loans supported economic development and four loans supported revitalization or stabilization. Examples of community development loans follow.

- \$1.6 million loan to fund municipal expansion projects in an area of distressed geographies.
- \$1.1 million loan to construct an office building for a start-up business, which will create employment opportunities for low- and moderate-income persons.

### **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the KY Non-MSA assessment area. Qualified investments total \$14.0 million, or 0.2 percent, of bank-wide qualified investments which is comparable to the percent of deposits at 0.2 but below the percent of branches of 0.6 in this assessment area. Investments included 2 new investments for \$7.1 million, 3 prior-period investments for \$6.5 million, and 26 grants totaling \$348,250. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$6.5 million in LIHTCs for the new construction of a 36-unit affordable multifamily housing development for low-income senior citizens. The property is located in a moderate-income census tract in the assessment area.
- \$589,373 in MBSs to support the financing of a 96-unit affordable multifamily housing development. The project was completed in partnership with HUD where rents are limited to less than 30 percent of income.
- \$90,000 community service grant to a local non-profit organization that provides medical training to low-income students for careers in medically underserved areas of the assessment area.
- \$12,500 economic development grant to a local non-profit organization that provides workforce retraining, particularly among the low- and moderate-income coal workers affected by the decline in the coal industry.

### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank provided a relatively high level of community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the assessment area. The branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 1 low-income and 10 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	5	2.9	14,014	2.6	1	7.1	0	0.0	0	0.0
Moderate	46	26.6	128,148	23.9	3	21.4	0	0.0	4	57.1
Middle	82	47.4	260,912	48.6	5	35.7	0	0.0	3	42.9
Upper	35	20.2	125,422	23.4	5	35.7	0	0.0	0	0.0
NA	5	2.9	8,614	1.6	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>173</b>	<b>100.0</b>	<b>537,110</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed seven branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

Truist provides a relatively high level of community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 75 community development services. This performance represents 31.4 percent of all activities in the state, which is below the assessment area's share of state-wide branches at 48.3 percent. However, the types of services reflect good responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides health and safety services for homeless and low- to moderate-income individuals.
- A bank employee serves on the Board of a non-profit youth resource center that provides services to enhance low- and moderate-income students' ability to succeed in school.
- A bank employee serves on the Board of a non-profit organization that provides rent and utility assistance, food assistance, and family counseling services for low- and moderate-income residents.

## LEXINGTON MSA ASSESSMENT AREA - Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LEXINGTON MSA ASSESSMENT AREA

The Lexington MSA assessment area consists of all six counties within the Lexington-Fayette, KY MSA. The bank operates six, or 20.7 percent, of its Kentucky branch offices in the Lexington MSA assessment area. The assessment area also represents 32.7 percent of the rated-area loans by dollar volume, 24.3 percent of rated-area lending by number of loans, and 20.9 percent of rated-area deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels in the moderate-income census tracts. The low-income census tracts contain limited levels. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 516,811, and the number of census tracts increased to 138. Regarding housing costs, the median housing value increased significantly to \$204,540, and the median gross rent increased to \$891. The number of businesses increased to 58,913. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Lexington MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	129	8.5	23.3	41.1	27.1	0.0
Population by Geography	489,799	7.9	24.8	40.1	27.1	0.0
Housing Units by Geography	213,431	8.3	26.0	40.0	25.7	0.0
Owner-Occupied Units by Geography	113,611	4.4	19.5	42.0	34.1	0.0
Occupied Rental Units by Geography	80,716	12.8	34.5	37.2	15.5	0.0
Vacant Units by Geography	19,104	11.8	28.4	40.2	19.6	0.0
Businesses by Geography	52,802	5.9	19.4	42.6	32.1	0.0
Farms by Geography	2,587	3.6	13.1	47.3	36.1	0.0
Family Distribution by Income Level	121,658	23.5	16.3	19.2	41.1	0.0
Household Distribution by Income Level	194,327	25.6	15.6	15.9	42.8	0.0
Median Family Income - Lexington-Fayette, KY MSA	\$66,800	Median Housing Value				\$176,310
		Median Gross Rent				\$767
		Families Below Poverty Level				11.8%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Lexington MSA assessment area was 3.1 percent.

In 2022, according to Moody's Analytics, the top industries were government, professional and business services, and education and health services. The top employers were University of Kentucky, Toyota Motor Corporation, Amazon, Baptist Health, and Catholic Health Initiatives.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 39 FDIC-insured institutions operated 179 branches within this area. Of these institutions, Truist ranked 8<sup>th</sup> in total deposits with a market share of 3.8 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from organizations were referenced within the Lexington MSA assessment area. Contacts noted economic conditions are stagnant with limited job growth. Small businesses continue to struggle to find qualified individuals willing to work. Additionally, housing stock is limited compared to demand. While many families are able to gain financing, they are being priced out of the market due to affordability issues. The contacts noted a need for small business, consumer, and affordable mortgage loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.8 percent of the families are low- or moderate-income. The community contacts also provided that small business and affordable home mortgage loans are credit needs.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LEXINGTON MSA ASSESSMENT AREA**

### **LENDING TEST**

Truist's Lending Test performance in the Lexington MSA assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending to borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low- and moderate-income census tracts was consistent with demographic and aggregate lending data. However, in 2020, performance in moderate-income census tracts was below demographic and aggregate lending data. Further, in 2022, performance in moderate-income census tracts was below demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low- and moderate-income census tracts was consistent with demographic and aggregate lending data. However, in 2020 and 2022, performance was below demographic data in moderate-income census tracts.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was similar to the aggregate lending data. Lending to moderate-income borrowers was above both demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 81.9 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Lexington MSA assessment area. The bank originated 14 community development loans totaling \$45.3 million. This amount represents 31.1 percent by number and 50.1 percent by dollar volume of total community development loans originated in Kentucky. Regarding the community development purpose, 2 loans supported community services, 11 loans supported economic development, and 1 loan supported revitalization or stabilization. Examples of community development loans follow.

- \$11.6 million loan to build new and refinance existing community facilities that benefit residents in low- and moderate-income geographies.
- \$1.2 million loan to a non-profit organization to purchase and renovate a building, which will be used to provide education to predominantly low- and moderate-income children.

## **INVESTMENT TEST**

The level of investments is significant, and responsiveness to community needs is excellent in the assessment area. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

The bank has a significant level of qualified investments and grants in the Lexington MSA assessment area. Qualified investments total \$6.4 million, or 0.1 percent, of bank-wide qualified investments which is comparable to the percent of deposits at 0.1 but below the percent of branches of 0.3 in this assessment area. Investments included 3 new investments for \$4.3 million, 3 prior-period investments for \$1.7 million, and 20 grants for \$411,000. Most of the qualified investments support affordable housing in the assessment area. Examples are provided below.

- \$1.5 million in LIHTCs for the construction of a 24-unit affordable multifamily housing development for low-income senior citizens. Renters are restricted to those earning 60 percent or less of the area median income.
- \$2.8 million in 2 LIHTCs for the financing of a 170-unit affordable multifamily housing development. The property is located in a low-income census tract in the assessment area.
- \$100,000 community service grant to a non-profit foundation that provides support services, including food, healthcare, and transportation to low- and moderate-income families affected by the pandemic.
- \$50,000 community service grant to a local non-profit food bank.

## **SERVICE TEST**

Delivery systems are accessible to limited portions of the assessment area. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the assessment area. The bank does not have any branches in low- and moderate-income census tracts; however, branches in middle- and upper-income census tracts serve approximately 1 low-income and 8 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level for the assessment area.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	9	6.5	28,510	5.5	0	0.0	0	0.0	0	0.0
Moderate	35	25.4	123,202	23.8	0	0.0	0	0.0	0	0.0
Middle	53	38.4	204,598	39.6	2	33.3	0	0.0	1	100.0
Upper	38	27.5	151,146	29.2	3	50.0	0	0.0	0	0.0
NA	3	2.2	9,355	1.8	1	16.7	0	0.0	0	0.0
<b>Totals</b>	<b>138</b>	<b>100.0</b>	<b>516,811</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in a middle-income census tract during the evaluation period.

### **Community Development Services**

Truist is a leader in providing community development services in this assessment area. During the evaluation period, bank records show that employees in the assessment area participated in 42 community development services. This performance represents 17.6 percent of all activities in the state, which is below the assessment area’s share of state-wide branches at 20.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the assessment area.

- A bank employee serves on the Board of a non-profit organization that provides free meals to low-income individuals who experience food insecurity.
- A bank employee serves on the Board of a non-profit organization with a mission to care for homeless and at-risk individuals.
- A bank employee serves on the Board of a non-profit organization that provides vocational training and job placement assistance for low- and moderate-income individuals.

## OTHER KENTUCKY ASSESSMENT AREAS – Limited Scope Review

### CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

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

Assessment Area	Lending Test	Investment Test	Service Test
Bowling Green MSA	Exceeds	Consistent	Exceeds
Owensboro MSA	Consistent	Below	Consistent
Clarksville MSA	Exceeds	Consistent	Consistent

The branch distribution and alternative delivery systems for the limited-scope assessment areas are consistent with the overall institution. Additionally, the service hours, loan and deposit products, services, and branch hours do not inconvenience low- and moderate-income individuals or areas.

A summary of operations and activities for each limited-scope assessment area follows, with additional information in the tables in Appendix D. Demographic data and deposit market share information for the limited-scope assessment areas is in Appendix E.

#### **Bowling Green MSA Assessment Area**

The Bowling Green MSA assessment area consists of Allen, Butler, Edmonson, and Warren Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$
Small Business Loans	1,292	\$131.3 million
Home Mortgage Loans	727	\$134.0 million
Small Farm Loans	30	\$3.8 million
Community Development Loans	8	\$6.1 million
Investments (New)	3	\$3.8 million
Investments (Prior Period)	1	\$2.7 million
Donations	6	\$130 thousand
CD Services	87	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

#### **Geographic Distribution and Borrower Profile**

Tables containing lending data for the Bowling Green MSA assessment area are in Appendix D.

### Owensboro MSA Assessment Area

The Owensboro MSA assessment area consists of Daviess, Hancock, and McLean Counties. Truist operates four branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	543	\$39.9 million
Home Mortgage Loans	378	\$48.5 million
Small Farm Loans	153	\$23.8 million
Community Development Loans	4	\$3.6 million
Investments (New)	0	\$0
Investments (Prior Period)	1	\$2.1 million
Donations	16	\$292 thousand
CD Services	24	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Owensboro MSA assessment area are in Appendix D.

### Clarksville MSA Assessment Area

The Clarksville MSA assessment area consists of Christian and Trigg Counties. Truist operates one branch in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

<b>Activity</b>	<b>#</b>	<b>\$</b>
Small Business Loans	187	\$12.3 million
Home Mortgage Loans	170	\$20.9 million
Small Farm Loans	24	\$2.3 million
Community Development Loans	2	\$2.9 million
Investments (New)	2	\$2.5 million
Investments (Prior Period)	1	\$855 thousand
Donations	2	\$15 thousand
CD Services	7	--
Source: 2020-2022 HMDA and CRA Data and Bank Records from 1/1/2020 to 12/31/2022		

### Geographic Distribution and Borrower Profile

Tables containing lending data for the Clarksville MSA assessment area are in Appendix D.

**WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV MULTI-STATE MSA**

**CRA RATING FOR WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD-WV MULTI-STATE MSA: OUTSTANDING**

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

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WASHINGTON MSA ASSESSMENT AREA**

The Washington MSA assessment area consists of all 16 counties and 7 independent cities within the Washington-Arlington-Alexandria, DC-VA-MD-WV Multi-state MSA. The bank operates 152 branches in the assessment area, which comprise 7.3 percent of its total branch offices. The assessment area also represents 13.4 percent of bank-wide loans by dollar volume, 8.9 percent of bank-wide lending by number of loans, and 8.3 percent of bank-wide deposits.

**Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. The low-income tracts reflect low levels. According to the 2020 U.S. Census, some significant changes have occurred in the assessment area. The total population increased to 5.1 million, and the number of census tracts increased to 1,190. The number of businesses increased significantly to 699,577. Regarding housing costs, the median housing value also increased significantly to \$468,588, and the median gross rent increased to \$1,727. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Washington MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,085	10.3	21.9	34.7	31.4	1.7
Population by Geography	4,703,318	9.2	21.8	35.6	32.7	0.6
Housing Units by Geography	1,814,455	10.0	21.8	35.1	32.7	0.5
Owner-Occupied Units by Geography	1,048,626	4.0	18.4	38.4	39.0	0.2
Occupied Rental Units by Geography	638,305	18.6	26.8	30.1	23.6	0.9
Vacant Units by Geography	127,524	15.8	24.9	32.5	26.3	0.5
Businesses by Geography	600,873	5.2	19.4	36.1	38.8	0.6
Farms by Geography	10,555	4.1	22.6	40.4	32.7	0.2
Family Distribution by Income Level	1,094,815	22.4	16.8	20.2	40.6	0.0
Household Distribution by Income Level	1,686,931	23.4	16.6	18.7	41.3	0.0
Median Family Income - Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA		\$106,105	Median Housing Value			\$400,493
			Median Gross Rent			\$1,520
			Families Below Poverty Level			6.1%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Washington MSA assessment area was 3.5 percent.

In 2022, according to Moody’s Analytics, the top industries were professional and business services, government, and education and health services. The top employers were Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International, and Inova Health System.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 70 FDIC-insured institutions operated 1,300 branches within this area. Of these institutions, Truist ranked 3rd in total deposits with a market share of 14.2 percent.

**Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Five community contacts from economic development authorities and housing agencies were referenced within the Washington MSA assessment area. The economic development contacts indicated a need for small business financing, as well as financial literacy/counseling services for small business owners. The housing agency contacts noted a need for available affordable housing, as the housing stock continues to be low.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that small business and home mortgage loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need, as 39.2 percent of the families are low- or moderate-income. The community contacts also provided similar credit needs.

## **SCOPE OF EVALUATION – WASHINGTON MSA ASSESSMENT AREA**

Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE WASHINGTON MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Washington-Arlington-Alexandria-, DC-VA-MD-WV Multi-state MSA. Lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was above both demographic and aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was above both demographic and aggregate lending data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, lending performance was above aggregate lending data. In addition, lending to moderate-income borrowers was well above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 75.1 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Washington MSA assessment area. During this evaluation period, the bank originated 815 community development loans totaling \$1.5 billion. This performance represents 11.4 percent by number and 9.2 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 76 community development loans totaling \$453.7 million were made. Regarding the community development purpose, 32 loans supported affordable housing, 34 loans supported community services, 742 loans supported economic development, and 7 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$123.3 million loan to refinance a 732-unit multifamily apartment complex that provides affordable housing for low- and moderate-income families.
- \$49.0 million construction loan to redevelop a multifamily housing complex. This was a complex transaction that also included a \$35.5 million LIHTC equity investment by Truist. These funds financed the first phase, providing 166 units of the total projected 530 units of affordable housing for low- and moderate-income persons. Further, 2 local non-profit entities will provide support services, job readiness, financial literacy programs, academic support, and other social services to residents of the housing complex.
- \$15.0 million loan to construct a new school building for an educational facility that primarily serves low- and moderate-income students.

### **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Washington-Arlington-Alexandria-, DC-VA-MD-WV Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Washington MSA assessment area. The bank provided 327 qualified investments for \$488.2 million. This represents 8.5 percent of bank-wide qualified investments, which exceeds the 7.3 percent of branches and 8.3 percent of deposits in the assessment area. Of the total qualified investments, 53 were new investments for \$363.8 million, 26 were prior-period investments for \$101.3 million, and 248 were

grants for \$23.1 million. The bulk of qualified investments in the Washington MSA assessment area support affordable housing. Examples are provided below.

- \$41.1 million in LIHTCs for the renovation of a 481-unit affordable multifamily development in the assessment area. Tenants are restricted to families earning less than 60 percent of the area median income.
- \$37.0 million in LIHTCs for the construction of a 166-unit affordable multifamily development in the assessment area. Tenants are restricted to families earning 50 percent or less of the area median income.
- \$27.6 million in LIHTCs for the financing of a 144-unit affordable multifamily development in the assessment area. Tenants are restricted to families earning 60 percent or less of the area median income.
- \$2.5 million in an SBIC fund that supports economic development by financing small businesses in the assessment area.

## **SERVICE TEST**

The Service Test is rated Outstanding for the Washington-Arlington-Alexandria-, DC-VA-MD-WV Multi-state MSA. Delivery systems are accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. Truist operates 152 branches in the Washington MSA assessment area, which represents 7.3 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is below the population in the respective tracts, while the branch distribution in moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 31 low-income and 81 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Washington MSA assessment area.



<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	107	9.0	414,943	8.2	9	5.9	0	0.0	3	3.8
Moderate	267	22.4	1,169,112	23.1	40	26.3	0	0.0	21	26.3
Middle	404	33.9	1,790,443	35.4	53	34.9	0	0.0	24	30.0
Upper	385	32.4	1,636,375	32.4	49	32.2	0	0.0	31	38.8
NA	27	2.3	40,511	0.8	1	0.7	0	0.0	1	1.3
<b>Totals</b>	<b>1,190</b>	<b>100.0</b>	<b>5,051,384</b>	<b>100.0</b>	<b>152</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, Truist closed 80 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 831 community development services since the last evaluation. This performance represents 6.4 percent of bank-wide activities, which is consistent with the assessment area's share of branches at 7.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Washington MSA assessment area.

- A bank employee serves on the Board of a non-profit organization that provides free healthcare to low-income and uninsured individuals.
- A bank employee serves on the loan committee of a community development company that promotes economic development through participation in the SBA 504 Loan Program.
- A bank employee serves on the Board of a non-profit organization that promotes school readiness through health, nutritional, and social services for low- and moderate-income families.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Washington MSA	30	632	168	1	831
<i>Source: Bank Records</i>					

## **CHARLOTTE-CONCORD-GASTONIA, NC-SC MULTI-STATE MSA**

### **CRA RATING FOR CHARLOTTE-CONCORD-GASTONIA, NC-SC MULTI-STATE MSA: OUTSTANDING**

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

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTE MSA ASSESSMENT AREA**

The Charlotte MSA assessment area consists of all 11 counties within the Charlotte-Concord-Gastonia, NC-SC Multi-state MSA. The bank operates 67 branches in the assessment area, which comprise 3.2 percent of its total branch offices. The assessment area also represents 4.2 percent of bank-wide loans by dollar volume, 4.3 percent of bank-wide lending by number of loans, and 15.6 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with good levels in the moderate-income census tracts. Levels within the low-income census tracts are significantly lower. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.6 million, and the number of census tracts increased to 677. Regarding housing costs, the median housing value increased significantly to \$236,727, and the median gross rent increased to \$1,083. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Charlotte MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	545	8.3	28.3	32.3	30.3	0.9
Population by Geography	2,364,927	6.8	26.5	33.6	32.8	0.3
Housing Units by Geography	973,522	7.0	27.2	33.8	31.9	0.1
Owner-Occupied Units by Geography	579,489	3.1	22.3	37.1	37.5	0.0
Occupied Rental Units by Geography	301,541	13.5	34.5	28.2	23.6	0.1
Vacant Units by Geography	92,492	10.7	34.1	31.9	23.2	0.2
Businesses by Geography	258,727	6.5	20.1	28.9	43.9	0.6
Farms by Geography	6,136	3.9	21.2	43.3	31.4	0.2
Family Distribution by Income Level	595,211	22.8	17.2	18.8	41.3	0.0
Household Distribution by Income Level	881,030	23.9	16.2	17.5	42.3	0.0
Median Family Income - Charlotte-Concord-Gastonia, NC-SC Multi-state MSA	\$64,187	Median Housing Value				\$182,660
		Median Gross Rent				\$881
		Families Below Poverty Level				11.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Charlotte MSA assessment area was 3.4 percent.

In 2022, according to Moody’s Analytics, the top industries were professional and business services, government, and retail trade. The top employers were Atrium Health, Wells Fargo & Company, Walmart, Bank of America Corporation, and Novant Health.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 46 FDIC-insured institutions operated 512 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 20.2 percent.

**Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Charlotte MSA assessment area. An economic development contact identified financing and technical assistance to businesses as a need. Additionally, the contact indicated that there are numerous areas in need in Charlotte, specifically, 17 opportunity zones that offer tax advantages and 6 areas in need of revitalization. An affordable housing agency identified the need for lending opportunities for low-

and moderate-income individuals as many individuals do not meet the credit criteria for affordable housing.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.0 percent of the families are low- or moderate-income. The community contacts provided a need for affordable housing and assistance for small businesses.

## **SCOPE OF EVALUATION – CHARLOTTE MSA ASSESSMENT AREA**

Refer to the overs Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHARLOTTE MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Charlotte-Concord-Gastonia, NC-SC Multi-state MSA. Lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic data but similar to aggregate lending data. In 2022, lending in moderate-income areas increased to 23.5 percent, which was similar to demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was similar to demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was consistent with the aggregate lending data. Lending to moderate-income borrowers was similar to both the demographic and aggregate lending data. In 2022, lending to moderate-income borrowers increased to 20.7 percent.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 75.0 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Charlotte MSA assessment area. During this evaluation period, the bank originated 293 community development loans totaling \$639.0 million. This performance represents 4.1 percent by number and 4.0 percent by dollar volume of bank-wide community development loans. Community development lending has significantly increased since the prior evaluation, when 73 community development loans totaling \$287.7 million were made. Regarding the community development purpose, 51 loans supported affordable housing, 33 loans supported community services, 195 loans supported economic development, and 14 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$15.0 million line-of-credit to a CDFI whose mission is to provide microloans, financial training, and support to low-income entrepreneurs.
- three loans totaling \$21.0 million to build a LIHTC apartment complex that provides 140 units of affordable housing for low- and moderate-income senior citizens, including set-aside units for extremely low-income senior citizens.
- three loans totaling \$44.1 million to build a multifamily housing complex with 188 units for low- and moderate-income persons. This affordable housing complex is also strategically located near numerous retail businesses and public transportation.

### **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Charlotte-Concord-Gastonia, NC-SC Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Charlotte MSA assessment area. The bank provided 222 qualified investments for \$180.4 million. This represents 3.1 percent of bank-wide qualified investments, which is comparable to the 3.2 percent of branches but below the 15.6 percent of bank-wide deposits. However, Charlotte is home to the bank's headquarters where there are a significant volume of corporate deposits allocated. Of the total qualified

investments, 7 were new investments for \$98.4 million, 21 were prior-period investments for \$59.3 million, and 194 were grants for \$22.7 million. The bulk of qualified investments in the Charlotte MSA assessment area support affordable housing. Examples are provided below.

- \$10.5 million in LIHTCs for the construction of an 84-unit affordable multifamily housing development in the assessment area. The project is restricted to families earning 60 percent or less of the area median income.
- \$17.4 million in LIHTCs for the new construction of a 198-unit affordable multifamily housing development in the assessment area. The project is restricted to families earning 60 percent or less of the area median income. HUD provided additional layered financing to facilitate the project.
- \$10.0 million investment to a local affordable housing non-profit organization. The goal of the non-profit organization is to reduce homelessness and create and preserve affordable housing, with a focus on naturally occurring affordable housing. The funds will help preserve and create more than 1,200 units by 2022. Truist served as the lead investor.
- \$24.1 million in LIHTCs to support the rehabilitation and further development of an affordable 216-unit multifamily apartment in the assessment area. The project is located on a Brownfield site in a low-income area that will require significant asbestos, radon, and unground storage tank abatement.

## **SERVICE TEST**

The Service Test is rated Outstanding for the Charlotte-Concord-Gastonia, NC-SC Multi-state MSA. Delivery systems are accessible to essentially all portions of the institution's assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. Truist operates 67 branches in the Charlotte MSA assessment area, which represents 3.2 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective census tracts. Further, branches in middle- and upper-income census tracts serve approximately 18 low-income and 54 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Charlotte MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	37	5.5	117,755	4.4	4	6.0	0	0.0	0	0.0
Moderate	196	29.0	741,465	27.9	23	34.3	1	100.0	9	39.1
Middle	217	32.1	888,856	33.4	13	19.4	0	0.0	8	34.8
Upper	212	31.3	887,232	33.4	24	35.8	0	0.0	5	21.7
NA	15	2.2	25,021	0.9	3	4.5	0	0.0	1	4.3
<b>Totals</b>	<b>677</b>	<b>100.0</b>	<b>2,660,329</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank opened 1 and closed 23 branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 432 community development services since the last evaluation. This performance represents 3.3 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 3.2 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Charlotte MSA assessment area.

- A bank employee serves on the Board of a non-profit organization with a primary goal to increase the reading literacy of youth living at or below the poverty level.
- A bank employee serves on the Board of a non-profit organization that provides housing and supportive services for low- and moderate-income and homeless families.
- A bank employee serves on the Board of a non-profit organization that provides financing to community development projects in low- and moderate-income areas.

The following table details the number of community development services by community development purpose.



<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Charlotte MSA	27	380	23	2	432
<i>Source: Bank Records</i>					

## MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH, SC-NC MULTI-STATE MSA

### CRA RATING FOR THE MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH, SC-NC MULTI-STATE MSA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MYRTLE BEACH MSA ASSESSMENT AREA

The Myrtle Beach MSA assessment area consists of two counties within the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA. The bank operates 19 branches in the assessment area, which comprise 0.9 percent of its total branch offices. The assessment area also represents 1.0 percent of bank-wide loans by dollar volume, 1.1 percent of bank-wide lending by number of loans, and 0.5 percent of the bank-wide deposits.

#### Economic and Demographic Data

The 2015 ACS Census shows the majority of owner-occupied housing units and businesses are within middle-income census tracts with relatively comparable levels noted within the moderate- and upper-income census tracts. Levels within the low-income census tracts are minimal. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 487,722, and the number of census tracts increased to 122. Regarding housing costs, the median housing value increased significantly to \$223,589, and the median gross rent increased to \$984. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Myrtle Beach MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	19.0	56.2	19.0	3.8
Population by Geography	406,656	1.5	19.0	63.6	15.7	0.2
Housing Units by Geography	271,514	1.5	14.4	60.7	23.2	0.1
Owner-Occupied Units by Geography	119,389	0.4	16.1	64.9	18.4	0.2
Occupied Rental Units by Geography	48,542	3.6	20.6	61.7	13.9	0.2
Vacant Units by Geography	103,583	1.7	9.5	55.5	33.2	0.1
Businesses by Geography	36,447	3.7	15.8	57.6	22.4	0.5
Farms by Geography	1,168	0.9	24.1	60.4	14.0	0.5
Family Distribution by Income Level	110,740	20.1	18.4	21.2	40.3	0.0
Household Distribution by Income Level	167,931	23.1	16.4	19.1	41.4	0.0
Median Family Income - Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	Median Housing Value			\$194,604
			Median Gross Rent			\$849
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Myrtle Beach MSA assessment area was 4.2 percent.

In 2022, according to Moody’s Analytics, the top industries were leisure and hospitality services, retail trade, and government. The top employers were Walmart Incorporated, Coastal Carolina University, Food Lion, Conway Medical Center, and Grand Strand Regional Medical Center.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 23 FDIC-insured institutions operated 141 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 16.7 percent.

**Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. A community contact from an economic development organization was referenced within the Myrtle Beach MSA assessment area. The contact identified a significant need for small business loans.

**Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need as 38.5 percent of the families are low- or moderate-income. The community contact also provided a significant need for small business loans.

## **SCOPE OF EVALUATION – MYRTLE BEACH MSA ASSESSMENT AREA**

Home mortgage loans received greater weight than small business loans when considering the number and dollar volume of these products in the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MYRTLE BEACH MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA. Lending levels reflect good responsiveness to the Myrtle Beach MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

#### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

#### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below demographic lending data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was below both demographic and aggregate lending data. However, lending in 2022 increased to 3.7 percent, which was consistent with demographic data. Performance in moderate-income census tracts exceeded both demographic and aggregate lending data. However, in 2022, lending performance decreased to 10.5 percent.

#### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and aggregate lending data. Lending to moderate-income borrowers was below the

demographic data but similar to aggregate lending data. In 2022, performance to moderate-income borrowers increased to 17.5 percent, which was similar to demographic data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 84.5 percent.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Myrtle Beach MSA assessment area. During this evaluation period, the bank originated 21 community development loans totaling \$64.9 million. This performance represents 0.3 percent by number and 0.4 percent by dollar volume of bank-wide community development loans. Community development lending has increased since the prior evaluation, when 4 community development loans totaling \$56.3 million were made. Regarding the community development purpose, 1 loan supported affordable housing, 1 loan supported community services, 17 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$1.9 million loan to renovate and convert a building in a moderate-income geography into a public safety facility, which attracts and retains businesses and residents by providing essential services.
- two loans totaling \$20.2 million for the construction and development of an anchor grocery store in a new mixed-use shopping center, which will create approximately 135 jobs, including jobs for low- and moderate-income persons.
- \$50,000 loan for a non-profit organization to finance building repairs related to a major disaster declaration.

### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in the Myrtle Beach MSA assessment area. The bank provided 24 qualified investments for \$16.4 million. This represents 0.3 percent of bank-wide qualified investments, which is below the 0.9 percent of branches and 0.5 percent of deposits in the Myrtle Beach MSA assessment area. Of the total qualified investments, 4 were new investments for \$10.1 million, 3 were prior-period investments for \$6.0 million, and 17 were grants for \$308,000. The bulk of qualified investments in the Myrtle Beach MSA assessment area support affordable housing. Examples are provided below.

- \$5.0 million in LIHTCs for the new construction of a 60-unit affordable multifamily development. Tenants are restricted to those earning 70 percent or below the area median income.
- \$2.6 million in LIHTCs to finance a 72-unit affordable multifamily housing development.

The project was completed in partnership with State and Federal assistance.

- \$1.0 million in LIHTCs for the new construction of a 60-unit affordable senior citizen multifamily development. Tenants are restricted to those earning 70 percent or below the area median income.
- \$85,000 grant to a non-profit organization that supports revitalization and stabilization in the assessment area. Programs include addressing the affordable housing and workforce needs in a designated Opportunity Zone area.

## SERVICE TEST

The Service Test is rated Outstanding for the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA is Outstanding. Delivery systems are accessible to essentially all portions of the institution’s assessment areas. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 19 branches in the Myrtle Beach MSA, which represents 0.9 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 1 low-income and 11 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level in the Myrtle Beach MSA.

Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	4	3.3	15,367	3.2	1	5.3	0	0.0	0	0.0
Moderate	18	14.8	78,534	16.1	4	21.1	0	0.0	0	0.0
Middle	68	55.7	295,014	60.5	11	57.9	0	0.0	2	66.7
Upper	30	24.6	98,807	20.3	3	15.8	0	0.0	1	33.3
NA	2	1.6	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>122</b>	<b>100.0</b>	<b>487,722</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed three branches in middle- and upper-income census tracts during the evaluation period.

**Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 121 community development services since the last evaluation. This performance represents 0.9 percent of bank-wide activities, which is consistent with the assessment area’s share of bank-wide branches at 0.9 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Myrtle Beach MSA assessment area.

- A bank employee serves on the Board of a non-profit organization with a mission to attract, retain, and facilitate the expansion of small businesses.
- A bank employee serves on the Board of an organization that promotes economic development for the business community.
- Several bank employees provided financial literacy training that included banking basics and family budgeting for low- and moderate-income students.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Myrtle Beach MSA	0	100	21	0	121

*Source: Bank Records*

## **LOUISVILLE-JEFFERSON COUNTY KY-IN MULTI-STATE MSA**

### **CRA RATING FOR THE LOUISVILLE-JEFFERSON COUNTY KY-IN MULTI-STATE MSA: OUTSTANDING**

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

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LOUISVILLE MSA ASSESSMENT AREA**

The Louisville MSA assessment area consists of all 10 counties within the Louisville-Jefferson County, KY-IN Multi-state MSA. The bank operates 20 branches offices in the assessment area, which comprises 1.0 percent of its total branches. The assessment area also represents 0.5 percent of bank-wide loans by dollar volume, 0.6 percent of bank-wide lending by number of loans, and 0.7 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 1.3 million, and the number of census tracts increased to 337. Regarding housing costs, the median housing value increased significantly to \$188,496, and the median gross rent increased to \$877. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.



Demographic Information for the Louisville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	11.7	20.4	39.5	27.4	1.0
Population by Geography	1,229,370	8.5	17.8	43.9	29.5	0.3
Housing Units by Geography	531,502	9.2	19.2	43.3	27.9	0.4
Owner-Occupied Units by Geography	321,877	4.0	14.7	46.5	34.8	0.1
Occupied Rental Units by Geography	158,517	16.9	26.8	38.3	17.2	0.9
Vacant Units by Geography	51,108	17.8	24.4	38.8	17.9	1.1
Businesses by Geography	127,196	7.2	15.4	36.3	38.1	3.0
Farms by Geography	4,010	3.1	11.6	49.1	35.5	0.6
Family Distribution by Income Level	309,601	21.0	17.5	20.4	41.0	0.0
Household Distribution by Income Level	480,394	24.5	15.7	17.8	42.1	0.0
Median Family Income - Louisville/Jefferson County, KY-IN Multi-state MSA		\$64,965	Median Housing Value			\$159,241
			Median Gross Rent			\$747
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Louisville MSA assessment area was 3.4 percent.

In 2022, according to Moody’s Analytics, the top industries were education and health services, professional and business services, and manufacturing. The top employers were United Parcel Service, Norton Healthcare, UofL Health Incorporated, Ford Motor Company, and Humana Incorporated.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 40 FDIC-insured institutions operated 343 branches within this area. Of these institutions, Truist ranked 6<sup>th</sup> in total deposits with a market share of 7.3 percent.

**Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One community contact from a real estate agency was referenced within the Louisville MSA assessment area. The contact indicated a need for affordable housing, particularly for low- and moderate-income individuals.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need as 38.5 percent of the families are low- or moderate-income. The community contact provided affordable housing was a need.

## **SCOPE OF EVALUATION – LOUISVILLE MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LOUISVILLE MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Louisville-Jefferson County, KY-IN Multi-state MSA. Lending levels reflect good responsiveness to the Louisville MSA assessment area's credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was similar to both demographic and aggregate lending data. Performance in moderate-income census tracts was below both demographic and aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below both demographic and aggregate lending data. Performance in moderate-income census tracts was similar to both demographic data and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income

families. Lending to low-income families was similar to the aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 80.3 percent.

### **Community Development Lending**

Truist made a relatively high level of community development loans in the Louisville MSA assessment area. During this evaluation period, the bank originated 28 community development loans totaling \$52.5 million. This performance represents 0.4 percent by number and 0.3 percent by dollar volume of bank-wide community development loans. Community development lending has slightly increased since the prior evaluation, when 15 community development loans totaling \$34.1 million were made. Regarding the community development purpose, 3 loans supported community services and 25 loans supported economic development. Examples of community development loans follow.

- \$1.2 million loan for an entity to acquire an existing small business, which will retain jobs for low- and moderate-income persons.
- \$100,000 line of credit to a nursing home and assisted living facility that primarily serves low- and moderate-income elderly individuals.

### **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Louisville-Jefferson County, KY-IN Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Louisville MSA assessment area. The bank provided 71 qualified investments for \$42.8 million. This represents 0.7 percent of bank-wide qualified investments, which is below the 1.0 percent of branches but is comparable to the 0.7 percent of deposits in the Louisville MSA assessment area. Of the total qualified investments, 7 were new investments for \$27.3 million, 8 were prior-period investments for \$13.7 million, and 56 were grants for \$1.8 million. The bulk of qualified investments in the Louisville MSA assessment area support affordable housing. Examples are provided below.

- \$14.5 million in LIHTCs to support the new construction of a 240-unit affordable multifamily development. The property is rent restricted to low- and moderate-income families and is located in a low-income census tract in the assessment area.
- \$4.0 million in an SBIC that supports economic development by financing small businesses in the assessment area.
- \$5.2 million in LIHTCs to support the financing of a 79-unit affordable apartment community in a low-income census tract of the assessment area.
- \$1.4 million in LIHTCs for the renovation of a 24-unit affordable multifamily development

in the assessment area. Rents are restricted to families earning less than 60 percent of the area median income.

**SERVICE TEST**

The Service Test is rated Outstanding Louisville-Jefferson County, KY-IN Multi-state MSA. Delivery systems are accessible to essentially all portions of the assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

**Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates 20 branches in the Louisville MSA, which represents 1.0 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 7 low-income and 8 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level in the Louisville MSA.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	30	8.9	74,604	5.8	2	10.0	0	0.0	0	0.0
Moderate	80	23.7	283,784	22.1	4	20.0	0	0.0	1	100.0
Middle	136	40.4	547,408	42.6	5	25.0	0	0.0	0	0.0
Upper	83	24.6	368,502	28.7	9	45.0	0	0.0	0	0.0
NA	8	2.4	11,141	0.9	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>337</b>	<b>100.0</b>	<b>1,285,439</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed one branch during the evaluation period. The closure primarily resulted from branch consolidation to address redundancies in branch

network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branch, minimizing concerns regarding accessibility to banking services.

**Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 121 community development services since the last evaluation. This performance represents 0.9 percent of bank-wide activities, which is consistent with the assessment area’s share of bank-wide branches at 1.0 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Louisville MSA assessment area.

- A bank employee serves on the Board of a non-profit organization that provides residential housing for low- and moderate-income individuals with disabilities.
- A bank employee serves on the Board of a non-profit organization that assists low- and moderate-income parents with housing, childcare, and supportive services.
- A bank employee serves on the Community Advisory Committee of a CDFI that provides affordable loan products and financial coaching services to low-income small business owners, renters, and homeowners.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Louisville MSA	9	108	4	0	121
<i>Source: Bank Records</i>					

## CHATTANOOGA, TN-GA MULTI-STATE MSA

### **CRA RATING FOR CHATTANOOGA, TN-GA MULTI-STATE MSA: SATISFACTORY**

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

The Investment Test is rated: **Outstanding**

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

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHATTANOOGA MSA ASSESSMENT AREA**

The Chattanooga MSA consists of all 6 counties within the Chattanooga, TN-GA multi-state MSA. The bank operates 16 branches in the assessment area, which comprise 0.8 percent of its total branch offices. The assessment area also represents 0.4 percent of bank-wide loans by dollar volume, 0.6 percent of bank-wide lending by number of loans, and 0.6 percent of bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased significantly to \$179,804, and the median gross rent increased to \$866. Additionally, median family income increased to \$70,533. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Chattanooga MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	119	8.4	20.2	43.7	26.1	1.7
Population by Geography	541,124	5.6	20.0	43.1	31.3	0.0
Housing Units by Geography	237,227	6.1	21.4	43.7	28.8	0.0
Owner-Occupied Units by Geography	141,800	2.6	18.6	44.7	34.1	0.0
Occupied Rental Units by Geography	67,612	11.7	25.6	42.2	20.5	0.0
Vacant Units by Geography	27,815	10.0	25.6	42.0	22.4	0.0
Businesses by Geography	51,081	6.2	17.2	41.2	35.2	0.2
Farms by Geography	1,346	3.5	16.2	46.7	33.7	0.0
Family Distribution by Income Level	141,337	21.3	17.5	20.3	40.8	0.0
Household Distribution by Income Level	209,412	24.7	15.9	17.6	41.9	0.0
Median Family Income - Chattanooga, TN-GA Multi-state MSA		\$58,694	Median Housing Value			\$145,888
			Median Gross Rent			\$743
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Chattanooga MSA assessment area was 3.3 percent.

In 2022, according to Moody’s Analytics, the top industries were manufacturing, government, and education and health services. The top employers were Erlanger Health System, BlueCross BlueShield of Tennessee, Tennessee Valley Authority, CHI Memorial Hospital, and McKee Food Corporation.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 28 FDIC-insured institutions operated 140 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 16.4 percent.

**Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. One existing community contact from a small business development organization was referenced within the Chattanooga MSA assessment area. The contact identified financing and technical assistance to businesses as a need, particularly loan programs geared towards start-up businesses and small dollar loans between \$2,500 and \$7,500. Additionally, the contact indicated that financial literacy programs are also a significant need.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need as 38.8 percent of the families are low- or moderate-income. Community development opportunities exist in financial literacy and technical assistance to small businesses. The community contact also provided some of these similar needs.

## **SCOPE OF EVALUATION – CHATTANOOGA MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CHATTANOOGA MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Chattanooga, TN-GA, Multi-state MSA. Lending levels reflect good responsiveness to the Chattanooga MSA assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was below both demographic data and aggregate lending data. In 2022, performance in moderate-income areas increased to 17.9 percent, which was similar to demographic data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic data but below aggregate lending data. Performance in moderate-income census tracts was similar to the demographic data but slightly below the aggregate lending data.



## **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 86.9 percent.

## **Community Development Loans**

Truist is a leader in making community development loans in the Chattanooga MSA assessment area. During this evaluation period, the bank originated 65 community development loans totaling \$109.9 million. This performance represents 0.9 percent by number and 0.7 percent by dollar volume of bank-wide community development loans. Regarding the community development purpose, 2 loans supported affordable housing, 3 loans supported community services, 44 loans supported economic development, and 16 loans supported revitalization or stabilization. Examples of community development loans follow.

- three loans totaling \$27.9 million for the construction and development of a commercial facility in a moderate-income geography, which will create approximately 150 jobs, including jobs for low- and moderate-income persons.
- \$14.9 million construction loan to support the acquisition and rehabilitation of a multifamily apartment complex with 200 units of affordable housing for low- and moderate-income persons, which was in partnership with a local housing development agency.
- \$7.3 million loan to substantially renovate a 111 unit multifamily housing complex that provides affordable housing for low- and moderate-income persons.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Chattanooga, TN-GA Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

## **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Chattanooga MSA assessment area. The bank provided 52 qualified investments for \$36.3 million. This represents 0.6 percent of bank-wide qualified investments, which is comparable to the 0.8 percent of branches and 0.6 percent of deposits in the Chattanooga MSA. Of the total qualified investments, 8 were new investments for \$24.0 million, 1 was a prior-period investment for \$11.4 million, and 43 were grants for \$949,500. The bulk of qualified investments in the Chattanooga MSA assessment area support affordable housing. Examples are provided below.

- \$6.9 million equity investment in a community development entity in the assessment area. The funds support economic development through the construction of a new packaging facility which will create 150 new jobs for low-income workers.
- \$5.5 million in LIHTCs for the construction of a 240-unit affordable multifamily housing development in the assessment area. The project is restricted to families earning 80 percent or less of the area median income.
- \$3.0 million in LIHTCs for the construction of a 64-unit affordable multifamily housing development in the assessment area. The project is restricted to families earning 80 percent or less of the area median income.
- \$11.4 million in LIHTCs for the renovation of a 221-unit affordable multifamily housing facility for senior citizens in the assessment area. All the units are restricted as affordable with incomes below 60 percent of the area median income.

## **SERVICE TEST**

The Service Test is rated High Satisfactory for the Chattanooga, TN-GA Multi-state MSA. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. Truist operates 16 branches in the Chattanooga MSA assessment area, which represents 0.8 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. However, branches in middle- and upper-income census tracts serve approximately 5 low-income and 15 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Chattanooga MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	8	5.9	28,339	5.0	2	12.5	0	0.0	0	0.0
Moderate	33	24.3	111,570	19.8	1	6.3	0	0.0	1	12.5
Middle	60	44.1	265,092	47.1	7	43.8	0	0.0	2	25.0
Upper	32	23.5	154,754	27.5	5	31.3	0	0.0	5	62.5
NA	3	2.2	2,892	0.5	1	6.3	0	0.0	0	0.0
<b>Totals</b>	<b>136</b>	<b>100.0</b>	<b>562,647</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed eight branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 103 community development services since the last evaluation. This performance represents 0.8 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Chattanooga MSA assessment area.

- A bank employee serves on the Board of a CDFI that utilizes SBA loan programs to provide innovative solutions for startup and existing businesses capital needs.
- A bank employee serves on the Board of a community foundation that provides grants to organizations that serve low- and moderate-income individuals.
- A bank employee serves on the Board of a non-profit organization that provides assistive technology and adult day services to low- and moderate-income individuals with disabilities.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Chattanooga MSA	3	91	9	0	103
<i>Source: Bank Records</i>					

## CINCINNATI, OH-KY-IN MULTI-STATE MSA

### **CRA RATING FOR CINCINNATI, OH-KY-IN MULTI-STATE MSA: SATISFACTORY**

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

The Investment Test is rated: **Outstanding**

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

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CINCINNATI MSA ASSESSMENT AREA**

The Cincinnati MSA assessment area consists of 12 of the 16 counties, as noted in the Description of the Assessment Areas, within the Cincinnati, OH-KY-IN Multi-state MSA. The bank operates 15 branches in the assessment area, which comprise 0.7 percent of its total branch offices. The assessment area also represents 0.6 percent of bank-wide lending by dollar volume and by number of loans and 0.4 percent bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the moderate-income census tracts. Significantly lower levels are noted in the low-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 2.2 million, and the number of census tracts increased to 530. Regarding housing costs, the median housing value increased significantly to \$184,668, and the median gross rent increased to \$879. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Cincinnati MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	484	13.0	23.1	36.4	25.6	1.9
Population by Geography	2,076,455	8.3	20.1	38.6	31.7	1.2
Housing Units by Geography	890,605	10.2	21.6	38.9	28.8	0.5
Owner-Occupied Units by Geography	527,688	3.9	17.0	41.8	37.1	0.1
Occupied Rental Units by Geography	271,005	18.3	28.6	35.0	17.1	1.1
Vacant Units by Geography	91,912	22.1	27.1	33.6	16.0	1.2
Businesses by Geography	150,429	6.8	19.3	35.7	37.2	1.0
Farms by Geography	4,558	3.4	17.9	46.6	31.9	0.2
Family Distribution by Income Level	522,328	22.3	16.7	19.9	41.1	0.0
Household Distribution by Income Level	798,693	25.3	15.4	17.1	42.1	0.0
Median Family Income - Cincinnati, OH-KY-IN Multi-state MSA		\$69,949	Median Housing Value			\$156,504
			Median Gross Rent			\$764
			Families Below Poverty Level			10.5%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Cincinnati MSA assessment area was 4.5 percent.

In 2022, according to Moody's Analytics, the top industries were professional and business services, education and health services, and government. The top employers were Kroger Company, Cincinnati Children's Hospital Medical Center, TriHealth Incorporated, St. Elizabeth Healthcare, and University of Cincinnati.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 58 FDIC-insured institutions operated 633 branches within this area. Of these institutions, Truist ranked 7<sup>th</sup> in total deposits with a market share of 1.1 percent.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Cincinnati MSA assessment area. Both contacts identified a need for affordable housing, including affordable rents. One contact indicated the need for investments to build affordable housing, as well as down-payment assistance programs, and loans for home preservation for low- and moderate-income individuals and families.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.0 percent of the families are low- or moderate-income. Community contact information also supports the need for affordable housing loans and programs.

## **SCOPE OF EVALUATION – CINCINNATI MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CINCINNATI MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Cincinnati, OH-KY-IN Multi-state MSA. Lending levels reflect good responsiveness to the Cincinnati MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data. In 2022, lending in moderate-income census tracts increased to 24.2 percent, which exceeded demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was below both demographic and aggregate lending data. However, lending in 2020 and 2022 was consistent with demographic data, and in 2020, performance was consistent with aggregate data. Lending in moderate-income census tracts was consistent with demographic and aggregate lending data. In 2020, lending exceeded both demographic and aggregate lending data.

## **Borrower Profile**

The borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects excellent penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families and aggregate lending data. Lending to moderate-income borrowers exceeded both demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance increased to 76.9 percent.

## **Community Development Loans**

Truist is a leader in making community development loans in the Cincinnati MSA assessment area. During this evaluation period, the bank originated 46 community development loans totaling \$151.3 million. This performance represents 0.6 percent by number and 0.9 percent by dollar volume of bank-wide community development loans. Community development lending has increased since the prior evaluation, when 38 community development loans totaling \$59.9 million were made. Regarding the community development purpose, 3 loans supported affordable housing, 4 loans supported community services, 36 loans supported economic development, and 3 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$17.3 million construction loan to develop a multifamily housing complex in a low-income geography with 124 units of affordable housing for low- and moderate-income persons.
- \$25.8 million loan for an entity to acquire an existing small business, which will retain jobs for low- and moderate-income persons.
- \$1.4 million loan to fund the renovation of 2 projects, which will create and improve commercial space and mixed-use buildings and housing for businesses and residents in low- and moderate-income geographies. This project involved NMTC, which are designed to increase investment in low-income areas in need of revitalization.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Cincinnati, OH-KY-IN Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

## **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Cincinnati MSA assessment area. The bank provided 87 qualified investments for \$23.0 million. This represents 0.4 percent of bank-wide qualified investments, which is below the 0.7 percent of branches but comparable to the 0.4 percent of deposits in the Cincinnati MSA assessment area. Of the total qualified investments, 6 were new investments for \$18.9 million, 2 were prior-period investments for \$3.0 million, and 79 were grants for \$1.1 million. The bulk of qualified investments in the Cincinnati MSA assessment area support affordable housing. Examples are provided below.



- \$8.0 million for the rehabilitation of a 200-unit affordable multifamily housing development in the assessment area. The investment was facilitated through the use of a multi-investor LIHTC fund.
- \$5.0 million in LIHTCs for the renovation of a 248-unit affordable multifamily housing development in the assessment area. The project was completed in partnership with local government to ensure that no resident pays more than 30 percent of their income on rent.
- \$1.3 million in an SBIC that provides financial support to small businesses in the assessment area.
- \$50,000 grant to a non-profit food bank that supports community service in the assessment area. The non-profit offers food, commodities, and emergency financial assistance to the homeless and low-income families in the assessment area.

## **SERVICE TEST**

The Service Test is rated High Satisfactory for the Cincinnati, OH-KY-IN Multi-state MSA. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. Truist operates 15 branches in the Cincinnati MSA assessment area, which represents 0.7 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is well above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 8 low-income and 10 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Cincinnati MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	52	9.8	150,671	6.9	2	13.3	0	0.0	0	0.0
Moderate	129	24.3	491,452	22.6	2	13.3	0	0.0	1	11.1
Middle	188	35.5	809,898	37.3	7	46.7	0	0.0	3	33.3
Upper	145	27.4	687,417	31.7	3	20.0	0	0.0	5	55.6
NA	16	3.0	30,955	1.4	1	6.7	0	0.0	0	0.0
<b>Totals</b>	<b>530</b>	<b>100.0</b>	<b>2,170,393</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed nine branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 80 community development services since the last evaluation. This performance represents 0.6 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.7 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Cincinnati MSA assessment area.

- Two bank employees serve on the Board of a non-profit organization with a mission to create opportunities for low- and moderate-income individuals and families to reach self-sufficiency through family support services, education, and employment.
- A bank employee serves on the Board of a non-profit youth center that provides administrative support, technical assistance and training for low- and moderate-income students and families.
- A bank employee serves on the Board of a CDFI that provides non-traditional investments and real estate services to revitalize low- and moderate-income communities.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Cincinnati MSA	3	51	22	4	80

*Source: Bank Records*

## MEMPHIS, TN-MS-AR MULTI-STATE MSA

### **CRA RATING FOR MEMPHIS, TN-MS-AR MULTI-STATE MSA: OUTSTANDING**

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

The Investment Test is rated: **Outstanding**

The Service Test is rated: **Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS MSA ASSESSMENT AREA**

The Memphis MSA assessment area consists of all 8 counties within the Memphis, TN-MS-AR multi-state MSA. The bank operates 18 branches in the assessment area, which comprise 0.8 percent of its total branch offices. The assessment area also represents 0.7 percent of bank-wide loans by dollar volume, 0.6 percent of bank-wide lending by number of loans, and 0.4 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts with fair levels in the low- and moderate-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 354. Occupied rental units increased to 203,239 with the units in low-income tracts decreasing to 20.3 percent and the units in moderate-income census tracts increasing to 32.5 percent. The total number of businesses has increased to 124,109, with businesses in moderate-income census tracts increasing to 23.6 percent. Regarding housing costs, the median housing value increased to \$156,787, and the median gross rent increased to \$956. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Memphis MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	312	23.1	21.2	24.4	28.8	2.6
Population by Geography	1,331,866	16.9	20.8	24.9	36.9	0.5
Housing Units by Geography	556,989	19.2	20.7	24.5	35.3	0.3
Owner-Occupied Units by Geography	300,277	10.2	17.3	26.9	45.5	0.1
Occupied Rental Units by Geography	188,825	27.7	24.6	22.4	24.9	0.4
Vacant Units by Geography	67,887	35.8	24.6	19.6	18.9	1.1
Businesses by Geography	107,494	12.3	16.8	23.0	47.1	0.9
Farms by Geography	2,734	6.4	16.6	31.1	45.2	0.6
Family Distribution by Income Level	323,772	24.6	15.8	17.5	42.1	0.0
Household Distribution by Income Level	489,102	25.5	15.5	16.5	42.5	0.0
Median Family Income - Memphis, TN-MS-AR Multi-state MSA		\$58,214	Median Housing Value			\$133,893
			Median Gross Rent			\$856
			Families Below Poverty Level			14.9%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Memphis MSA assessment area was 4.6 percent.

In 2022, according to Moody’s Analytics, the top industries were professional and business services, education and health services, and government. The top employers were FedEx Corporation, United States Government, Methodist Le Bonheur Healthcare, Baptist Memorial Healthcare Corporation, and The Kroger Company.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 46 FDIC-insured institutions operated 338 branches within this area. Of these institutions, Truist ranked 6<sup>th</sup> in total deposits with a market share of 4.5 percent.

**Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Memphis MSA assessment area. Both contacts noted the need for financial literacy education to assist in combating poverty. Additionally, the contacts noted many individuals struggle with obtaining credit due to poor credit history. The contacts also noted a need for safe and practical small dollar loans, providing additional options to low- and moderate-income individuals to build credit and not rely

upon predatory lending. Lastly, all contacts noted a need for affordable housing to low- and moderate-income individuals.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.4 percent of the families are low- or moderate-income. The community contacts also stated affordable housing as a credit need.

## **SCOPE OF EVALUATION – MEMPHIS MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE MEMPHIS MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Memphis, TN-MS-AR Multi-state MSA. Lending levels reflect good responsiveness to the Memphis MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and is a leader in making community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in both low- and moderate-income census tracts was below demographic data but consistent with aggregate data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Performance in both low- and moderate-income census tracts was consistent with demographic and aggregate lending data.

### **Borrower Profile**

The borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families. However, performance was consistent with the aggregate lending data. Lending to moderate-income borrowers was consistent with demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, the bank's performance decreased to 74.9 percent.

### **Community Development Loans**

Truist is a leader in making community development loans in the Memphis MSA assessment area. During this evaluation period, the bank originated 92 community development loans totaling \$332.4 million. This performance represents 1.3 percent by number and 2.1 percent by dollar volume of bank-wide community development loans. Regarding the community development purpose, 12 loans supported community services, 64 loans supported economic development, and 16 loans supported revitalization or stabilization. Examples of community development loans follow.

- two loans totaling \$16.8 million for the construction, renovation, and expansion of a commercial facility in a moderate-income geography, which will create approximately 25 jobs, including jobs for low- and moderate-income persons. This was a complex transaction that also included a \$1.5 million NMTC equity investment by Truist.
- \$10.0 million loan to support a CDFI's investment fund, which provides rehabilitation and construction financing for residential units along with financing for retail and commercial space in predominantly low- and moderate-income geographies.

### **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Memphis, TN-MS-AR Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Memphis MSA assessment area. The bank provided 75 qualified investments for \$43.6 million. This represents 0.8 percent of bank-wide qualified investments, which is comparable to the 0.8 percent of branches but exceeds the 0.4 percent of deposits in the Memphis MSA assessment area. Of the total qualified investments, 7 were new investments for \$36.1 million, 2 were prior-period investments for \$5.2 million, and 66 were grants for \$2.3 million. The bulk of qualified investments in the Memphis MSA assessment area support affordable housing. Examples are provided below.

- \$12.3 million in LIHTCs to renovate a 296-unit senior citizen assisted living facility. Rents are limited to 30 percent of income and to residents earning less than 60 percent of the area median income.
- \$11.8 million in LIHTCs to provide funding for an 80-unit affordable housing development. Truist also provided the initial construction financing. Tenants are limited to persons earning less than 60 percent of the area median income.
- \$4.8 million in NMTCs which supports community service in the assessment area by providing funding for the renovation of a low-cost health care clinic. The clinic is also located in a medically underserved low-income census tract.
- \$13.6 million in MBSs to support the rehabilitation of a 129-unit affordable multifamily housing development. The project adheres to HUD Section 8 guidelines where rents are limited to 30 percent of income.

## **SERVICE TEST**

The Service Test is rated Outstanding for the Memphis, TN-MS-AR Multi-state MSA. Delivery systems are accessible to essentially all portions of the institution's assessment area. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. Truist operates 18 branches in the Memphis MSA assessment area, which represents 0.8 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is above the percent of the population in the respective tracts, while the branch distribution in moderate-income census tracts is below the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 14 low-income and 9 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Memphis MSA assessment area.



Branch Distribution by Geography Income Level										
Tract Income Level	Census Tracts		Population		Branches		Branch Openings		Branch Closings	
	#	%	#	%	#	%	#	%	#	%
Low	57	16.1	156,130	11.7	3	16.7	0	0.0	0	0.0
Moderate	94	26.6	337,689	25.2	3	16.7	0	0.0	1	25.0
Middle	90	25.4	376,881	28.2	4	22.2	0	0.0	0	0.0
Upper	98	27.7	448,044	33.5	8	44.4	0	0.0	3	75.0
NA	15	4.2	19,035	1.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>354</b>	<b>100.0</b>	<b>1,337,779</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed four branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 104 community development services since the last evaluation. This performance represents 0.8 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.8 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Memphis MSA assessment area.

- A bank employee serves on the Board of a non-profit organization that facilitates innovative solutions to advance racial equity in homeownership for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that provides support for the intellectual, social, emotional, and physical needs of children from low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization with a mission to equip underserved minority students with skills to close the racial wealth gap by improving employment opportunities.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Memphis MSA	6	85	13	0	104
<i>Source: Bank Records</i>					

## **HAGERSTOWN-MARTINSBURG, MD-WV MULTI-STATE MSA**

### **CRA RATING FOR HAGERSTOWN-MARTINSBURG, MD-WV MULTI-STATE MSA: SATISFACTORY**

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

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

**The Service Test is rated: Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HAGERSTOWN-MSA ASSESSMENT AREA**

The Hagerstown MSA assessment area consists of all 3 counties within the Hagerstown-Martinsburg, MD-WV Multi-state MSA. The bank operates 11 branches in the assessment area, which comprise 0.5 percent of its total branch offices. The assessment area also represents 0.2 percent of bank-wide loans by dollar volume, 0.4 percent of bank-wide lending by number of loans, and 0.3 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units are primarily within middle- and upper-income census tracts. The majority of businesses are within the middle-income census tracts with comparable levels in the moderate- and upper-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased significantly to \$201,565, and the median gross rent increased to \$964. Additionally, median family income increased to \$77,963. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

<b>Demographic Information for the Hagerstown MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	50	4.0	24.0	54.0	16.0	2.0
Population by Geography	275,469	2.0	17.3	59.9	18.4	2.3
Housing Units by Geography	116,803	2.2	19.9	60.6	17.4	0.0
Owner-Occupied Units by Geography	71,166	0.8	12.8	64.5	21.9	0.0
Occupied Rental Units by Geography	33,240	4.7	30.9	54.2	10.1	0.0
Vacant Units by Geography	12,397	3.5	31.0	54.8	10.7	0.0
Businesses by Geography	20,328	4.8	18.7	56.5	19.8	0.1
Farms by Geography	1,004	1.0	7.0	60.8	31.3	0.0
Family Distribution by Income Level	70,563	20.8	17.2	22.0	40.0	0.0
Household Distribution by Income Level	104,406	23.4	15.7	19.7	41.2	0.0
Median Family Income - Hagerstown-Martinsburg, MD-WV Multi-state MSA	\$64,343	Median Housing Value				\$181,908
		Median Gross Rent				\$877
		Families Below Poverty Level				9.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Hagerstown MSA assessment area was 3.1 percent.

In 2022, according to Moody’s Analytics, the top industries were government, education and health services, and retail trade. The top employers were Meritus Health, Citicorp Credit Services, First Data Corporation, Volvo Powertrain North America, and FedEx Corporation.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 16 FDIC-insured institutions operated 71 branches within this area. Of these institutions, Truist ranked 1<sup>st</sup> in total deposits with a market share of 22.1 percent.

**Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Two community contacts from non-profit organizations were referenced within the Hagerstown MSA assessment area. A small business development contact identified financing and technical assistance to businesses as a need, particularly micro-loans. Another economic development contact indicated that there are opportunities for investment in infrastructure, especially broadband internet projects in rural areas.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 38.0 percent of the families are low- or moderate-income. A community contact also stated a need for small business loans.

## **SCOPE OF EVALUATION – HAGERSTOWN MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HAGERSTOWN MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is High Satisfactory for the Hagerstown-Martinsburg, MD-WV Multi-state MSA. Lending levels reflect good responsiveness to the Hagerstown MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was consistent with demographic and aggregate lending data. Performance in moderate-income census tracts was consistent with demographic data and slightly above aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was slightly below demographic and aggregate lending data, while performance in moderate-income census tracts was above both demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income

families. However, performance was above aggregate lending data. Lending to moderate-income borrowers was above both the demographic and aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was slightly below demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Hagerstown MSA assessment area. During this evaluation period, the bank originated 21 community development loans totaling \$21.8 million. This performance represents 0.3 percent by number and 0.1 percent by dollar volume of bank-wide community development loans. Community development lending has increased since the prior evaluation, when 18 community development loans totaling \$11.2 million were made. Regarding the community development purpose, 1 loan supported affordable housing, 6 loans supported community services, and 14 loans supported economic development. Examples of community development loans follow.

- two renewed lines-of-credit totaling \$2.1 million to a non-profit provider of health and human services, which is located in a low-income geography and predominantly serves low- and moderate-income developmentally disabled persons. More specifically, the non-profit organization provides residential services, including alternative living units, as well as supportive services such as budgeting, counseling, and job training.
- \$750,000 line-of-credit to a non-profit provider of mental health, substance abuse, and other health services to predominately low- and moderate-income persons.

### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in the Hagerstown-Martinsburg, MD-WV Multi-state MSA. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in the Hagerstown MSA assessment area. The bank provided 28 qualified investments for \$13.1 million. This represents 0.2 percent of bank-wide qualified investments, which is below the 0.5 percent of branches and 0.3 percent of deposits in the Hagerstown MSA assessment area. Of the total qualified investments, 3 were new investments for \$1.6 million, 2 were prior-period investments for \$11.2 million, and 23 were grants for \$302,200. The bulk of qualified investments in the Hagerstown MSA assessment area support affordable housing. Examples are provided below.

- \$1.0 million in LIHTCs to renovate a 40-unit affordable multifamily development in the assessment area. All rents are restricted to families earning 60 percent or less than the area median income.

- \$499,000 in MBSs for the financing of a 148-bed low-cost nursing home that supports community service in the assessment area. All beds are certified for either Medicare or Medicaid.
- \$123,000 in MBSs to renovate an affordable 96-unit multifamily development in the assessment area. This affordable housing project restricts rents to 30 percent or less of adjusted income and to families earning 60 percent of the area median income.
- \$50,000 grant to a local non-profit organization in support of community service. The grant will help fund the creation of a small food market located in an area with limited food markets among local public housing. All of the residents are certified annually by the public housing authority to be low-income.

## **SERVICE TEST**

The Service Test is rated Outstanding for the Hagerstown-Martinsburg, MD-WV Multi-state MSA. Delivery systems are readily accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the institution's assessment area. Truist operates 11 branches in the Hagerstown MSA assessment area, which represents 0.5 percent of bank-wide branches. Overall, the branch distribution in low- and moderate-income census tracts is above the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 1 low-income and 9 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Hagerstown MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	2	2.9	6,006	2.0	1	9.1	0	0.0	0	0.0
Moderate	16	23.5	67,329	22.9	3	27.3	0	0.0	1	50.0
Middle	36	52.9	154,542	52.6	6	54.5	0	0.0	1	50.0
Upper	13	19.1	60,607	20.6	1	9.1	0	0.0	0	0.0
NA	1	1.5	5,360	1.8	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>68</b>	<b>100.0</b>	<b>293,844</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed two branches during the evaluation period. The closures primarily resulted from branch consolidations to address redundancies in branch network coverage. Consequently, the remaining branch offices are located in close proximity to the closed branches, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 59 community development services since the last evaluation. This performance represents 0.5 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.5 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Hagerstown MSA assessment area.

- Several bank employees facilitated homeownership workshops covering the home buying process in collaboration with a housing counseling agency for low- and moderate-income homebuyers.
- Several bank employees provided financial literacy training for low- and moderate-income individuals that introduced them to various types of loans for home improvement.
- Several bank employees provided technical training to small business owners. The topics included personal and business finances, cash flow, merchant services, borrowing solutions, and insurance.

The following table details the number of community development services by community development purpose.



<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Hagerstown MSA	20	36	3	0	59
<i>Source: Bank Records</i>					

## COLUMBUS, GA-AL MULTI-STATE MSA

### **CRA RATING FOR COLUMBUS, GA-AL MULTI-STATE MSA: SATISFACTORY**

**The Lending Test is rated: High Satisfactory**  
**The Investment Test is rated: High Satisfactory**  
**The Service Test is rated: Outstanding**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE COLUMBUS MSA ASSESSMENT AREA**

The Columbus MSA assessment area consists of all seven counties within the Columbus, GA-AL Multi-state MSA. The bank operates five branches in the assessment area, which comprise 0.2 percent of its total branch offices. The assessment area also represents 0.1 percent of bank-wide loans by dollar volume, 0.2 percent of bank-wide lending by number of loans, and 0.3 percent deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows that owner-occupied housing units and businesses are primarily within middle- and upper-income census tracts. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, no significant changes have occurred in the assessment area.

<b>Demographic Information for the Columbus MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	83	14.5	30.1	33.7	19.3	2.4
Population by Geography	324,374	8.2	26.9	34.1	29.8	0.9
Housing Units by Geography	136,663	9.4	28.7	32.4	29.4	0.0
Owner-Occupied Units by Geography	65,163	3.6	25.4	31.6	39.5	0.0
Occupied Rental Units by Geography	51,458	15.9	30.5	33.8	19.8	0.0
Vacant Units by Geography	20,042	11.9	35.2	31.8	21.0	0.1
Businesses by Geography	27,229	7.7	21.6	34.7	35.6	0.3
Farms by Geography	754	3.8	20.8	35.8	39.3	0.3
Family Distribution by Income Level	76,506	22.7	17.9	18.2	41.2	0.0
Household Distribution by Income Level	116,621	25.0	15.7	16.6	42.8	0.0
Median Family Income - Columbus, GA-AL Multi-state MSA		\$52,902	Median Housing Value			\$127,973
			Median Gross Rent			\$819
			Families Below Poverty Level			15.0%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Columbus MSA assessment area was 3.6 percent.

In 2022, according to Moody's Analytics, the top industries were government, education and health services, and professional and business services. The top employers were Fort Benning, TSYS, Aflac, Piedmont Columbus Regional, and Kia Motors Manufacturing Georgia.

### **Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 17 FDIC-insured institutions operated 51 branches within this area. Of these institutions, Truist ranked 2<sup>nd</sup> in total deposits with a market share of 15.6 percent.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners conducted one community contact with an economic development organization within the Columbus MSA assessment area. The contact indicated that the primary credit need in the assessment area is small business lending. Additionally, the contact indicated that the area needs more capital in the form of economic development investment particularly by large bank lenders. Furthermore, the contact stated banks could do more to encourage an entrepreneurial culture and provide business technical assistance and education.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 40.6 percent of the families are low- or moderate-income. The community contact also provided small business lending is a credit need.

## **SCOPE OF EVALUATION – COLUMBUS MSA ASSESSMENT AREA**

Small business loans were given more weight than home mortgage loans when considering the bank's performance during the evaluation period.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE COLUMBUS MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Columbus, GA-AL Multi-state MSA. Lending levels reflect good responsiveness to the Columbus MSA assessment area credit needs. The geographic distribution reflects adequate penetration throughout the assessment area, and the borrower profile reflects excellent distribution of lending among borrowers of different income levels and

businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The overall geographic distribution of home mortgage and small business loans is adequate.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in low-income census tracts was similar to demographic and aggregate lending data. Performance in moderate-income census tracts was significantly below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was slightly below both demographic and aggregate lending data. However, performance in moderate-income census tracts was similar to demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is excellent.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families. However, performance was consistent with the aggregate lending data. Lending to moderate-income borrowers was slightly below demographic data but was above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 85.0 percent.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Columbus MSA assessment area. During this evaluation period, the bank originated 14 community development loans totaling \$6.7 million. This performance represents 0.2 percent by number and 0.0 percent by dollar volume of bank-wide community development loans. Community development lending, by dollar volume, has decreased since the prior evaluation, when 4 community development loans totaling \$21.4 million were made. Regarding the community development purpose, 2 loans supported community services, 10 loans supported economic development, and 2 loans supported revitalization or stabilization. Examples of community development loans follow.

- \$1.2 million loan to purchase a public safety vehicle that provides essential services for residents and businesses in predominantly low- and moderate-income geographies.
- \$3.9 million loan to refinance existing debt for a group of medical clinics that predominately provide health services to low- and moderate-income individuals.

## **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in the Columbus, GA-AL Multi-state MSA. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in the Columbus MSA assessment area. The bank provided 29 qualified investments for \$5.4 million. This represents 0.1 percent of bank-wide qualified investments, which is below the 0.2 percent of branches and 0.3 percent of deposits in the Columbus MSA assessment area. Of the total qualified investments, 7 were new investments for \$5.1 million and 22 were grants for \$291,260. The bulk of qualified investments in the Columbus MSA assessment area support affordable housing. Examples are provided below.

- \$1.8 million in LIHTCs to fund a 50-unit senior citizen affordable housing community located in a moderate-income census tract in the assessment area.
- \$1.7 million in LIHTCs to support the renovation and revitalization of a mixed-use development in the assessment area. The property has 31 affordable multifamily housing units and 4 commercial units. The development is located in a low-income census tract and an Opportunity Zone.
- \$742,000 in SBA bonds in support of economic development to aid small businesses in the assessment area.
- \$50,000 in MBSs to support affordable housing in the assessment area. The property is a 33-unit multifamily housing development with rents restricted to low- and moderate-income families.

## **SERVICE TEST**

The Service Test is rated Outstanding for the Columbus, GA-AL Multi-state MSA. Delivery systems are accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment area. Truist operates five branches in the Columbus MSA assessment area, which represents 0.2 percent of bank-wide branches. Overall, the branch distribution in low-income census tracts is well above

the percent of the population in the respective tracts while the bank does not operate any branches in moderate-income census tracts. However, branches in middle- and upper-income census tracts serve approximately 9 low-income and 13 moderate-income census tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level in the Columbus MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	12	12.5	25,753	7.8	1	20.0	0	0.0	0	0.0
Moderate	29	30.2	86,743	26.4	0	0.0	0	0.0	0	0.0
Middle	26	27.1	103,715	31.5	1	20.0	0	0.0	1	33.3
Upper	26	27.1	107,929	32.8	3	60.0	0	0.0	2	66.7
NA	3	3.1	4,743	1.4	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>96</b>	<b>100.0</b>	<b>328,883</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. As shown in the table above, the bank closed three branches in middle- and upper-income census tracts during the evaluation period.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 33 community development services since the last evaluation. This performance represents 0.3 percent of bank-wide activities, which is consistent with the assessment area’s share of bank-wide branches at 0.2 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Columbus MSA assessment area.

- A bank employee serves on the Board of a CDFI that provides affordable housing loans for low- and moderate-income families.
- A bank employee serves on the Board of a non-profit organization that facilitates and coordinates economic revitalization initiatives in a low-income section of the assessment area.

- A bank employee serves on the Board of a healthcare system that primarily serves low- and moderate-income individuals.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Columbus MSA	8	15	8	2	33
<i>Source: Bank Records</i>					

## KINGSPORT-BRISTOL, TN-VA MULTI-STATE MSA

### **CRA RATING FOR KINGSPORT-BRISTOL, TN-VA MULTI-STATE MSA: SATISFACTORY**

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

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

The Service Test is rated: **Outstanding**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KINGSPORT MSA ASSESSMENT AREA**

The Kingsport MSA consists of all five counties within the Kingsport-Bristol, TN-VA Multi-state MSA. The bank operates seven branches in the assessment area, which comprise 0.3 percent of its total branch offices. The assessment area also represents 0.0 percent of bank-wide loans by dollar volume, 0.2 percent of bank-wide lending by number of loans, and 0.2 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the majority of owner-occupied housing units and businesses are within middle-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. In 2015, there were no low-income census tracts; however, the 2020 Census Data reflects two low-income census tracts. Additionally, the median housing value increased significantly to \$138,560, and the median gross rent increased to \$670. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.



<b>Demographic Information of the Kingsport MSA Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	75	0.0	17.3	61.3	21.3	0.0
Population by Geography	308,200	0.0	17.3	61.8	20.9	0.0
Housing Units by Geography	147,259	0.0	18.1	61.7	20.3	0.0
Owner-Occupied Units by Geography	94,955	0.0	14.2	63.1	22.6	0.0
Occupied Rental Units by Geography	34,403	0.0	27.6	56.5	15.9	0.0
Vacant Units by Geography	17,901	0.0	20.0	63.8	16.2	0.0
Businesses by Geography	20,474	0.0	21.0	56.2	22.8	0.0
Farms by Geography	918	0.0	11.1	66.9	22.0	0.0
Family Distribution by Income Level	86,422	21.1	18.5	19.9	40.5	0.0
Household Distribution by Income Level	129,358	23.8	16.6	17.2	42.4	0.0
Median Family Income - Kingsport-Bristol, TN-VA Multi-state MSA		\$51,210	Median Housing Value			\$120,052
			Median Gross Rent			\$595
			Families Below Poverty Level			13.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Kingsport MSA assessment area was 3.6 percent.

In 2022, according to Moody’s Analytics, the top industries were manufacturing, education and health services, and retail trade. The top employers were Eastman Chemical Company, Wellmont Health Systems, Holston Medical Group, Food City, and Century Link.

**Competition**

Competition in this assessment area is significant. According to FDIC Deposit Market Share data as of June 30, 2022, 25 FDIC-insured institutions operated 85 branches within this area. Of these institutions, Truist ranked 4<sup>th</sup> in total deposits with a market share of 8.7 percent.

**Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion. Additionally, affordable housing represents a need as 39.6 percent of the families are low- or moderate-income.

**SCOPE OF EVALUATION – KINGSFORT MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE KINGSPORT MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Kingsport-Bristol, TN-VA Multi-state MSA. Lending levels reflect good responsiveness to the Kingsport MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and made a relatively high level of community development loans.

#### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

#### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good. There are no low-income census tracts in the assessment area for the 2015 ACS demographic data, as such, the analysis focused on lending performance in moderate-income census tracts. However, analysis using the 2020 Census Data included the review of low-income tracts given the change in demographics between census tabulations.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in moderate-income census tracts was consistent with both demographic data and aggregate lending data. However, in 2022 performance in moderate-income census tracts decreased to 8.8 percent, which is below demographic data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in moderate-income census tracts was consistent with demographic data and slightly above aggregate lending data.

#### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families; however, performance was above aggregate lending data. Lending to moderate-income borrowers was consistent with demographic data and above aggregate lending data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was below demographic data but significantly above the aggregate lending data. In 2022, performance increased to 82.8 percent.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Kingsport MSA assessment area. During this evaluation period, the bank originated five community development loans totaling \$5.1 million. This performance represents 0.1 percent by number and 0.0 percent by dollar volume of bank-wide community development loans. Community development lending, by dollar volume, has slightly decreased since the prior evaluation, when two community development loans totaling \$7.1 million were made.

All five community development loans totaling \$5.1 million were made to small businesses or non-profit organizations to promote job retention for low- or moderate-income persons. These loans were originated through the SBA's PPP during 2020 or 2021.

### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory in the Kingsport-Bristol, TN-VA Multi-state MSA. The level of investments is significant, and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has a significant level of qualified investments and grants in the Kingsport MSA assessment area. The bank provided 22 qualified investments for \$3.7 million. This represents 0.1 percent of bank-wide qualified investments, which is below the 0.3 percent of branches and 0.2 percent of deposits in the Kingsport MSA assessment area. Of the total qualified investments, 5 were new investments for \$3.5 million and 17 were grants for \$188,500. The bulk of qualified investments in the Kingsport MSA assessment area support affordable housing. Examples are provided below.

- \$1.0 million in LIHTCs to support the financing of a 22-unit affordable multifamily housing project in the assessment area. Rents are restricted to families earning 60 percent or less of the area median income.
- \$751,000 in LIHTCs to support the financing of a 103-unit affordable multifamily housing project in the assessment area. Rents are restricted to families earning 60 percent or less of the area median income.
- \$620,000 in LIHTCs to support the financing of a 103-unit affordable multifamily housing project in the assessment area. Rents are restricted to families earning 60 percent or less of the area median income.
- \$25,000 grant to a local non-profit organization that supports community service in the assessment area. The grant will support programs that teach and provide sustainable food supplies to low- and moderate-income families in the assessment area.

### **SERVICE TEST**

The Service Test is rated Outstanding for the Kingsport-Bristol, TN-VA Multi-state MSA. Delivery systems are accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.

Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

**Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution’s assessment area. Truist operates seven branches in the Kingsport MSA assessment area which represents 0.3 percent of bank-wide branches. Overall, the bank does not have any branches in low-income census tracts; however, less than two percent of the population resides in the respective tracts. The branch distribution in moderate-income census tracts is consistent with the percent of the population in the respective tracts. Further, branches in middle- and upper-income census tracts serve approximately 4 moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank’s branch distribution by tract income level in the Kingsport MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	2	2.5	4,904	1.6	0	0.0	0	0.0	0	0.0
Moderate	14	17.7	48,248	15.7	1	14.3	0	0.0	0	0.0
Middle	46	58.2	185,554	60.3	5	71.4	0	0.0	1	100.0
Upper	17	21.5	68,908	22.4	1	14.3	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>79</b>	<b>100.0</b>	<b>307,614</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data.  
Due to rounding, totals may not equal 100.0 percent.*

**Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch in a middle-income census tract during the evaluation period.

**Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 40 community development services since the last evaluation. This performance represents 0.3 percent of bank-wide activities, which is consistent the assessment area’s share of branches at 0.3 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Kingsport MSA assessment area.

- A bank employee serves on the Board of a non-profit organization that provides training and technical assistance to small businesses.
- A bank employee serves on the Advisory Board of a non-profit organization that provides financial management and technical assistance to minority-owned small businesses.
- Several bank employees provided financial literacy training on topics that included credit building, credit repair, budgeting, and homeownership to low- and moderate-income individuals.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	#	#	#	#	#
Kingsport MSA	5	31	4	0	40
<i>Source: Bank Records</i>					

## CUMBERLAND, MD-WV MULTI-STATE MSA

### **CRA RATING FOR CUMBERLAND, MD-WV MULTI-STATE MSA: SATISFACTORY**

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

The Investment Test is rated: **Outstanding**

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

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CUMBERLAND MSA ASSESSMENT AREA**

The Cumberland MSA assessment area consists of both counties within the Cumberland, MD-WV Multi-state MSA. The bank operates three branches in the assessment area, which comprise 0.1 percent of its total branch offices. The assessment area represents less than 0.1 percent of bank-wide lending by dollar volume and by number of loans and 0.2 percent of the bank-wide deposits.

#### **Economic and Demographic Data**

The 2015 ACS Census shows the majority of owner-occupied housing units and businesses are within middle-income census tracts with good levels in the upper-income tracts and fair levels in the moderate-income census tracts. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of businesses in the assessment area increased to 6,363. Regarding housing costs, the median housing value increased to \$132,742. The following table presents demographic information from the 2015 ACS Census and 2021 D&B data.

Demographic Information for the Cumberland MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.0	16.7	66.7	16.7	0.0
Population by Geography	101,304	0.0	16.0	65.5	18.5	0.0
Housing Units by Geography	46,338	0.0	16.5	65.3	18.1	0.0
Owner-Occupied Units by Geography	25,937	0.0	12.8	69.0	18.2	0.0
Occupied Rental Units by Geography	13,652	0.0	23.3	58.5	18.1	0.0
Vacant Units by Geography	6,749	0.0	17.2	64.8	18.0	0.0
Businesses by Geography	5,762	0.0	15.5	61.5	23.0	0.0
Farms by Geography	195	0.0	10.3	77.9	11.8	0.0
Family Distribution by Income Level	23,667	21.3	18.2	20.1	40.4	0.0
Household Distribution by Income Level	39,589	25.5	16.0	16.1	42.5	0.0
Median Family Income - Cumberland, MD-WV Multi-state MSA		\$53,566	Median Housing Value			\$122,890
			Median Gross Rent			\$592
			Families Below Poverty Level			11.8%

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

According to the U.S. Bureau of Labor Statistics, during the examination period, unemployment levels increased significantly during 2020 and then declined in 2021 and 2022. As of December 31, 2022, the unemployment rate in the Cumberland MSA assessment area was 4.7 percent.

In 2022, according to Moody’s Analytics, the top industries were government, education and health services, and retail trade. The top employers were Western Maryland Health System, Northrop Grumman, Frostburg State University, Hunter Douglas Northeast, and American Woodmark Corporation.

**Competition**

Competition in this assessment area is moderate. According to FDIC Deposit Market Share data as of June 30, 2022, 7 FDIC-insured institutions operated 22 branches within this area. Of these institutions, Truist ranked 3<sup>rd</sup> in total deposits with a market share of 24.6 percent.

**Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information is helpful to identify whether local financial institutions are responsive to those needs and opportunities. Examiners conducted a community contact with an economic development agency within the assessment area. The contact stated the local economy is still depressed, and population is continuing to decrease. A majority of the existing land and infrastructure has to be repurposed in order for it to be usable for commercial businesses. The contact stated that entrepreneurship is very high in the area and as such, there is a need for small business financing. In regards to housing, the

housing stock is very limited, and there is not a wide diversity in the housing stock. Much of the housing stock is old and in need of repair or improvements. Additionally, many of the newly built apartment complexes are luxury complexes that are not affordable for low- and moderate-income families. As such, the contact noted a need for affordable housing and home improvement loans.

### **Credit and Community Development Needs and Opportunities**

Considering demographic and economic data, examiners determined that home mortgage and small business loans represent significant credit needs for the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less supports this conclusion.

Additionally, affordable housing represents a need as 39.5 percent of the families are low- or moderate-income. The community contact provided that small business and affordable housing loans are the primary credit needs.

## **SCOPE OF EVALUATION – CUMBERLAND MSA ASSESSMENT AREA**

Refer to the overall Scope of Evaluation for details.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE CUMBERLAND MSA ASSESSMENT AREA**

### **LENDING TEST**

The Lending Test is rated High Satisfactory for the Cumberland, MD-WV Multi-state MSA. Lending levels reflect good responsiveness to the Cumberland MSA assessment area credit needs. The geographic distribution reflects good penetration throughout the assessment area, and the borrower profile reflects good distribution of lending among borrowers of different income levels and businesses of different sizes. In addition, the bank uses flexible lending practices and originated a relatively high level of community development loans.

### **Lending Activity**

Lending levels reflect good responsiveness to the assessment area's credit needs. The tables in Appendix D detail the number and dollar volume of 2021 HMDA and CRA loans in this assessment area.

### **Geographic Distribution**

The geographic distribution of home mortgage and small business loans is good. There are no low-income census tracts in the assessment area; as such, the analysis focused on lending performance in moderate-income census tracts.

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in moderate-income census tracts was slightly below demographic data but consistent with aggregate lending data.

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Performance in moderate-income census tracts was slightly below demographic data but was above aggregate lending data. In 2020, performance significantly exceeded both



demographic and aggregate lending data.

### **Borrower Profile**

The overall borrower distribution of home mortgage and small business loans is good.

The borrower distribution of home mortgage loans reflects good penetration among borrowers of different incomes. Lending to low-income borrowers was below the percent of low-income families but was consistent with the aggregate lending data. Regarding moderate-income borrowers, lending was consistent with demographic and aggregate lending data. However, in 2022, lending to moderate-income borrowers increased to 24.2 percent, which was well above the demographic data.

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. Performance was consistent with demographic data but significantly above the aggregate lending data.

### **Community Development Loans**

Truist made a relatively high level of community development loans in the Cumberland MSA assessment area. During this evaluation period, the bank originated four community development loans totaling \$1.4 million. This performance represents 0.1 percent by number and 0.0 percent by dollar volume of bank-wide community development loans. Community development lending has decreased since the prior evaluation, when five community development loans totaling \$5.9 million were made. Regarding the community development purpose, one loan supported affordable housing, one loan supported community services, and two loans supported economic development. Examples of community development loans follow.

- \$1.3 million renewed line-of-credit to a nursing facility in a moderate-income geography that primarily serves low- and moderate-income elderly individuals.
- \$130,000 loan to finance installation of an elevator at a multifamily apartment building providing 44 units of affordable housing for low- and moderate-income senior citizens or disabled individuals.

## **INVESTMENT TEST**

The Investment Test is rated Outstanding in the Cumberland, MD-WV Multi-state MSA. The level of investments and responsiveness to community needs is excellent. In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives.

### **Investment and Grant Activity**

Truist has an excellent level of qualified investments and grants in the Cumberland MSA assessment area. The bank provided 11 qualified investments for \$4.0 million. This represents 0.1 percent of bank-wide qualified investments, which is comparable to the 0.1 percent of branches and 0.2 percent of deposits in the Cumberland MSA assessment area. Of the total qualified investments, 1 was a new investment for \$3.9 million, and 10 were grants for \$90,000. The bulk of qualified

investments in the Cumberland MSA assessment area support community service. Examples are provided below.

- \$3.9 million in MBSs that support community service by helping to finance a low-cost Medicaid certified nursing home in the assessment area. The nursing home has 122 certified beds and is located in a moderate-income census tract.
- \$10,000 community service grant to a local non-profit organization that provides housing, foster care, and other support programs for low-income families in the assessment area.
- \$10,000 community service grant to a local non-profit organization that provides employment training, computer access, life skills, and other support programs to disabled low-income residents.
- \$5,000 affordable housing grant to a non-profit housing agency that assists low-income families to purchase, rent, or repair homes in the assessment area.

## **SERVICE TEST**

The Service Test is rated High Satisfactory for Cumberland, MD-WV Multi-state MSA. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Services and business hours are tailored to the convenience and needs of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank is a leader in providing community development services.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. Truist operates three branches in the Cumberland MSA assessment area, which represents 0.1 percent of bank-wide branches. The bank does not have any branches in moderate-income census tracts; however, branches in middle- and upper-income census tracts serve approximately two moderate-income tracts. The ATM distribution is consistent with the branch distribution. In addition, the bank offers an array of other alternative delivery systems for its customers. The following table reflects the bank's branch distribution by tract income level in the Cumberland MSA assessment area.

<b>Branch Distribution by Geography Income Level</b>										
<b>Tract Income Level</b>	<b>Census Tracts</b>		<b>Population</b>		<b>Branches</b>		<b>Branch Openings</b>		<b>Branch Closings</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	13.8	9,413	9.9	0	0.0	0	0.0	1	100.0
Middle	22	75.9	77,411	81.4	2	66.7	0	0.0	0	0.0
Upper	3	10.3	8,220	8.6	1	33.3	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>29</b>	<b>100.0</b>	<b>95,044</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2020 U.S. Census and Bank Data  
Due to rounding, totals may not equal 100.0 percent.*

### **Changes in Branch Locations**

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. As shown in the table above, the bank closed one branch during the evaluation period. The closure resulted from branch consolidations to address redundancies in branch network coverage after the merger. Consequently, the remaining branch offices are located in close proximity to the closed branch, minimizing concerns regarding accessibility to banking services.

### **Community Development Services**

The bank is a leader in providing community development services in this assessment area. Bank records show that employees participated in 17 community development services since the last evaluation. This performance represents 0.1 percent of bank-wide activities, which is consistent with the assessment area's share of bank-wide branches at 0.1 percent. The types of services reflect excellent responsiveness to the assessment area needs. Bank employees served on Boards and assisted a variety of organizations, which provided services to low- and moderate-income individuals and small businesses in the assessment area. The following are examples of community development services provided in the Cumberland MSA assessment area.

- A bank employee facilitated several housing finance workshops for low- and moderate-income homebuyers.
- A bank employee facilitated several financial literacy sessions on financial management for low- and moderate-income students.
- Several bank employees facilitated financial literacy workshops that covered the value of a checking account, how to establish credit, and how to develop a budget for low- and moderate-income individuals.

The following table details the number of community development services by community development purpose.

<b>Community Development Services</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Total</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Cumberland MSA	2	15			17
<i>Source: Bank Records</i>					

## **APPENDIX A: LARGE BANK PERFORMANCE CRITERIA**

### **Lending Test**

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

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

### **Investment Test**

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

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

## Service Test

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

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

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

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

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

## APPENDIX B: SCOPE OF EVALUATION

<b>Truist Bank</b>	
<b>Scope of Examination:</b> Large bank CRA examination procedures were used for this evaluation. Each state or multi-state MSA (if the bank had branches in more than one state) in which the institution maintains a branch office received analysis and review of its lending, investments, and services activities to arrive at a state-wide or multi-state MSA rating.	
<b>Time Period Reviewed:</b>	01/01/2020 – 12/31/2022
<b>Products Reviewed:</b> Home Mortgage Loans: 01/01/2020 – 12/31/2022 Small Business Loans: 01/01/2020 – 12/31/2022 Small Farm Loans: 01/01/2020 – 12/31/2022	

<b>List of Affiliates and Products Reviewed</b>		
Affiliate	Affiliate Relationship	Products Reviewed
Grandbridge Real Estate Capital, LLC	Subsidiary	Multifamily loans

<b>List of Assessment Areas and Type of Evaluation</b>			
Rated Area/ Assessment Area	Type of Evaluation	Branches Visited	Other Information
<b>Florida</b>			
Tampa MSA	Full-Scope	None	None
Orlando MSA	Full-Scope	None	None
Miami MD	Full-Scope	None	None
Fort Lauderdale MD	Full-Scope	None	None
West Palm Beach MD	Full-Scope	None	None
North Port MSA	Limited-Scope	None	None
Jacksonville MSA	Limited-Scope	None	None
Deltona MSA	Limited-Scope	None	None
Cape Coral MSA	Limited-Scope	None	None
Palm Bay MSA	Limited-Scope	None	None
Lakeland MSA	Limited-Scope	None	None
Port St Lucie MSA	Limited-Scope	None	None
Ocala MSA	Limited-Scope	None	None
Naples MSA	Limited-Scope	None	None
Tallahassee MSA	Limited-Scope	None	None
Homosassa Springs MSA	Limited-Scope	None	None
Pensacola MSA	Limited-Scope	None	None
Punta Gorda MSA	Limited-Scope	None	None
Crestview MSA	Limited-Scope	None	None
FL Non-MSA	Limited-Scope	None	None
Gainesville MSA	Limited-Scope	None	None
Sebastian MSA	Limited-Scope	None	None
The Villages MSA	Limited-Scope	None	None
Panama City MSA	Limited-Scope	None	None
Sebring MSA	Limited-Scope	None	None
<b>North Carolina</b>			
Raleigh MSA	Full-Scope	None	None

<b>List of Assessment Areas and Type of Evaluation</b>			
NC Non-MSA	Full-Scope	None	None
Durham MSA	Full-Scope	None	None
Greensboro MSA	Full-Scope	None	None
Winston-Salem MSA	Limited-Scope	None	None
Asheville MSA	Limited-Scope	None	None
Wilmington MSA	Limited-Scope	None	None
Hickory MSA	Limited-Scope	None	None
Fayetteville MSA	Limited-Scope	None	None
Greenville MSA	Limited-Scope	None	None
New Bern MSA	Limited-Scope	None	None
Burlington MSA	Limited-Scope	None	None
Goldsboro MSA	Limited-Scope	None	None
Rocky Mount MSA	Limited-Scope	None	None
Jacksonville MSA	Limited-Scope	None	None
<b>Georgia</b>			
Atlanta MSA	Full-Scope	None	None
GA Non-MSA	Full-Scope	None	None
Savannah MSA	Limited-Scope	None	None
Augusta MSA	Limited-Scope	None	None
Gainesville MSA	Limited-Scope	None	None
Athens MSA	Limited-Scope	None	None
Macon MSA	Limited-Scope	None	None
Warner Robins MSA	Limited-Scope	None	None
Dalton MSA	Limited-Scope	None	None
Brunswick MSA	Limited-Scope	None	None
Albany MSA	Limited-Scope	None	None
Rome MSA	Limited-Scope	None	None
Valdosta MSA	Limited-Scope	None	None
<b>Virginia</b>			
Richmond MSA	Full-Scope	None	None
Virginia Beach MSA	Full-Scope	None	None
VA Non-MSA	Full-Scope	None	None
Roanoke MSA	Limited-Scope	None	None
Charlottesville MSA	Limited-Scope	None	None
Lynchburg MSA	Limited-Scope	None	None
Harrisonburg MSA	Limited-Scope	None	None
Winchester MSA	Limited-Scope	None	None
Staunton MSA	Limited-Scope	None	None
Blacksburg MSA	Limited-Scope	None	None
<b>Maryland</b>			
Baltimore MSA	Full-Scope	None	None
Frederick MD	Full-Scope	None	None
MD Non-MSA	Limited-Scope	None	None
Salisbury MSA	Limited-Scope	None	None
California MSA	Limited-Scope	None	None
Wilmington MD	Limited-Scope	None	None
<b>Texas</b>			
Dallas MD	Full-Scope	None	None
Houston MSA	Full-Scope	None	None
Austin MSA	Full-Scope	None	None
Fort Worth MD	Limited-Scope	None	None



<b>List of Assessment Areas and Type of Evaluation</b>			
San Antonio MSA	Limited-Scope	None	None
College Station MSA	Limited-Scope	None	None
Midland MSA	Limited-Scope	None	None
Odessa MSA	Limited-Scope	None	None
<b>Pennsylvania</b>			
Montgomery County MD	Full-Scope	None	None
Lancaster MSA	Full-Scope	None	None
Allentown MSA	Full-Scope	None	None
Philadelphia MD	Full-Scope	None	None
Reading MSA	Limited-Scope	None	None
York MSA	Limited-Scope	None	None
Harrisburg MSA	Limited-Scope	None	None
PA Non-MSA	Limited-Scope	None	None
Chambersburg MSA	Limited-Scope	None	None
Scranton MSA	Limited-Scope	None	None
Gettysburg MSA	Limited-Scope	None	None
Lebanon MSA	Limited-Scope	None	None
Williamsport MSA	Limited-Scope	None	None
State College MSA	Limited-Scope	None	None
East Stroudsburg MSA	Limited-Scope	None	None
<b>South Carolina</b>			
Greenville MSA	Full-Scope	None	None
Charleston SA	Full-Scope	None	None
Columbia MSA	Full-Scope	None	None
Spartanburg MSA	Limited-Scope	None	None
Hilton Head MSA	Limited-Scope	None	None
SC Non-MSA	Limited-Scope	None	None
Florence MSA	Limited-Scope	None	None
Sumter MSA	Limited-Scope	None	None
<b>Tennessee</b>			
Nashville MSA	Full-Scope	None	None
Knoxville MSA	Full-Scope	None	None
TN Non-MSA	Limited-Scope	None	None
Johnson City MSA	Limited-Scope	None	None
Morristown MSA	Limited-Scope	None	None
Cleveland MSA	Limited-Scope	None	None
<b>Alabama</b>			
Birmingham MSA	Full-Scope	None	None
Huntsville MSA	Full-Scope	None	None
Daphne MSA	Full-Scope	None	None
Montgomery MSA	Full-Scope	None	None
AL Non-MSA	Limited-Scope	None	None
Mobile MSA	Limited-Scope	None	None
Auburn MSA	Limited-Scope	None	None
Tuscaloosa MSA	Limited-Scope	None	None
Florence MSA	Limited-Scope	None	None
Anniston MSA	Limited-Scope	None	None
Dothan MSA	Limited-Scope	None	None
Gadsden MSA	Limited-Scope	None	None

<b>List of Assessment Areas and Type of Evaluation</b>			
<b>New Jersey</b>			
New Brunswick MD	Full-Scope	None	None
Camden MD	Full-Scope	None	None
Atlantic City MSA	Limited-Scope	None	None
Vineland MSA	Limited-Scope	None	None
Trenton MSA	Limited-Scope	None	None
<b>West Virginia</b>			
WV Non-MSA	Full-Scope	None	None
Charleston MSA	Full-Scope	None	None
Morgantown MSA	Full-Scope	None	None
Huntington MSA	Limited-Scope	None	None
Beckley MSA	Limited-Scope	None	None
Wheeling MSA	Limited-Scope	None	None
Parkersburg MSA	Limited-Scope	None	None
<b>Kentucky</b>			
KY Non-MSA	Full-Scope	None	None
Lexington MSA	Full-Scope	None	None
Bowling Green MSA	Limited-Scope	None	None
Owensboro MSA	Limited-Scope	None	None
Clarksville MSA	Limited-Scope	None	None
<b>Washington-Arlington-Alexandria, DC-MD-VA-WV Multi-state MSA</b>	Full-Scope	None	None
<b>Charlotte-Concord-Gastonia, NC-SC Multi-state MSA</b>	Full-Scope	None	None
<b>Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA</b>	Full-Scope	None	None
<b>Louisville-Jefferson County, KY-IN Multi-state MSA</b>	Full-Scope	None	None
<b>Chattanooga, TN-GA Multi-state MSA</b>	Full-Scope	None	None
<b>Cincinnati, OH-KY-IN Multi-state MSA</b>	Full-Scope	None	None
<b>Memphis, TN-MS-AR Multi-state MSA</b>	Full-Scope	None	None
<b>Hagerstown-Martinsburg, MD-WV Multi-state MSA</b>	Full-Scope	None	None
<b>Columbus, GA-AL Multi-state MSA</b>	Full-Scope	None	None
<b>Kingsport-Bristol, TN-VA Multi-state MSA</b>	Full-Scope	None	None
<b>Cumberland, MD-WV Multi-state MSA</b>	Full-Scope	None	None

## APPENDIX C: SUMMARY OF RATINGS FOR RATED AREAS

<b>Rated Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>	<b>Rating</b>
Florida	High Satisfactory	Outstanding	Outstanding	Outstanding
North Carolina	High Satisfactory	Outstanding	Outstanding	Outstanding
Georgia	High Satisfactory	Outstanding	Outstanding	Outstanding
Virginia	High Satisfactory	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	Outstanding	Outstanding
Texas	High Satisfactory	Outstanding	Outstanding	Outstanding
Pennsylvania	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
South Carolina	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Tennessee	High Satisfactory	Outstanding	Outstanding	Outstanding
Alabama	Outstanding	Outstanding	Outstanding	Outstanding
New Jersey	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
West Virginia	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Washington-Arlington-Alexandria, DC-VA-MD-WV Multi-state MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Charlotte-Concord-Gastonia, NC-SC Multi-state MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multi-state MSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Louisville-Jefferson County, KY-IN Multi-state MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Chattanooga, TN-GA Multi-state MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Cincinnati, OH-KY-IN Multi-state-MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Memphis, TN-MS-AR Multi-state MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Hagerstown-Martinsburg, MD-WV Multi-state MSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Columbus, GA-AL Multi-state MSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kingsport-Bristol, TN-VA Multi-state MSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Cumberland, MD-WV Multi-state MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

## APPENDIX D: LENDING PERFORMANCE TABLES

Florida: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FL Non-MSA	199	162,568	0.8	8,590	1.1	0.0	0.2	17.5	13.1	9.7	40.8	25.1	29.8	40.6	61.8	60.3	0.0	0.0	0.0
FL-Cape Coral MSA	900	182,219	3.8	55,246	2.1	1.7	1.4	18.6	18.0	19.6	44.2	42.3	44.7	35.1	38.0	34.3	0.0	0.0	0.0
FL-Crestview MSA	411	205,387	1.7	26,714	0.0	0.0	0.0	12.2	4.1	5.5	62.3	52.3	59.4	25.5	43.6	35.1	0.0	0.0	0.0
FL-Deltona MSA	1,141	194,982	4.8	45,261	0.8	0.3	0.3	12.6	7.5	9.5	62.4	55.4	61.8	24.2	36.8	28.3	0.0	0.0	0.0
FL-Fort Lauderdale MD	1,584	590,130	6.6	87,745	2.8	2.4	2.4	24.8	19.3	20.6	34.0	25.4	33.2	38.4	52.9	43.8	0.0	0.0	0.0
FL-Gainesville MSA	291	72,525	1.2	13,120	1.8	2.4	2.1	27.1	11.3	18.1	37.1	28.2	39.3	33.6	56.0	39.6	0.5	2.1	0.9
FL-Homosassa Springs MSA	412	70,855	1.7	9,282	0.0	0.0	0.0	20.1	12.1	17.8	62.7	73.3	59.6	17.3	14.6	22.5	0.0	0.0	0.0
FL-Jacksonville MSA	1,691	746,356	7.1	104,002	3.4	0.7	1.6	19.7	12.8	14.3	41.3	28.3	39.9	35.6	58.3	44.3	0.0	0.0	0.0
FL-Lakeland MSA	638	125,812	2.7	44,340	1.3	0.6	0.6	17.3	12.7	13.0	58.8	50.6	63.7	22.6	36.1	22.8	0.0	0.0	0.0
FL-Miami MD	1,377	630,282	5.8	92,934	2.0	0.8	1.5	21.4	17.1	17.3	31.9	22.4	30.3	44.4	59.3	50.0	0.2	0.4	0.9
FL-Naples MSA	479	180,912	2.0	27,642	2.3	0.2	1.2	16.3	13.8	14.3	41.3	44.3	42.4	40.1	41.8	42.1	0.0	0.0	0.0

Florida: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FL-North Port MSA	1,567	499,782	6.5	59,444	1.0	0.3	0.4	18.3	14.7	12.7	50.7	44.2	44.2	29.9	40.8	42.7	0.0	0.0	0.0
FL-Ocala MSA	554	84,915	2.3	21,434	0.6	0.0	0.1	14.5	8.5	10.8	69.6	74.9	70.6	15.3	16.6	18.5	0.0	0.0	0.0
FL-Orlando MSA	3,332	1,073,186	13.9	146,602	1.0	1.1	0.9	21.1	15.8	16.6	39.1	33.1	40.9	38.8	50.0	41.7	0.0	0.0	0.0
FL-Palm Bay MSA	1,011	233,729	4.2	40,168	1.6	0.8	1.0	21.1	18.1	20.4	43.5	36.8	42.5	33.8	44.3	36.0	0.0	0.0	0.0
FL-Panama City MSA	125	30,048	0.5	12,927	2.5	0.0	1.1	13.3	9.6	7.1	52.4	50.4	57.5	31.8	40.0	34.3	0.0	0.0	0.0
FL-Pensacola MSA	477	134,307	2.0	31,843	1.6	0.0	0.4	15.2	8.2	9.0	54.7	46.3	50.9	28.5	45.5	39.7	0.0	0.0	0.0
FL-Port St Lucie MSA	600	121,738	2.5	35,802	1.6	0.7	0.7	13.0	12.7	10.3	54.4	46.0	56.9	30.9	40.7	32.1	0.0	0.0	0.0
FL-Punta Gorda MSA	407	72,718	1.7	15,352	0.0	0.0	0.0	10.7	9.8	13.7	70.6	69.3	67.2	18.6	20.9	19.0	0.0	0.0	0.0
FL-Sebastian MSA	173	41,154	0.7	10,330	1.4	0.6	0.7	13.4	11.0	12.8	54.1	54.3	58.6	31.1	34.1	27.9	0.0	0.0	0.0
FL-Sebring MSA	96	12,416	0.4	4,763	0.0	0.0	0.0	4.5	3.1	2.9	76.6	72.9	73.8	18.9	24.0	23.3	0.0	0.0	0.0
FL-Tallahassee MSA	471	100,461	2.0	15,513	4.9	0.6	3.6	18.0	9.8	12.7	41.9	33.8	42.5	34.7	55.2	40.2	0.6	0.6	0.9
FL-Tampa MSA	4,281	1,207,211	17.9	190,203	1.9	1.9	1.8	21.9	17.2	17.5	39.7	32.8	37.5	36.5	48.1	43.2	0.1	0.0	0.0
FL-The Villages MSA	211	42,244	0.9	10,070	0.2	0.0	0.1	23.0	22.3	32.5	76.8	77.7	67.1	0.0	0.0	0.0	0.0	0.0	0.4

<b>Florida: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
FL-West Palm Beach MD	1,502	453,708	6.3	78,210	3.1	2.1	2.4	23.3	18.2	19.5	32.7	28.3	34.1	40.6	51.3	43.8	0.2	0.1	0.2
<b>Total</b>	<b>23,930</b>	<b>7,269,643</b>	<b>100.0</b>	<b>1,187,537</b>	<b>1.9</b>	<b>1.1</b>	<b>1.3</b>	<b>19.9</b>	<b>14.9</b>	<b>15.8</b>	<b>43.4</b>	<b>38.1</b>	<b>43.3</b>	<b>34.7</b>	<b>45.8</b>	<b>39.5</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

Florida: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FL Non-MSA	199	162,568	0.8	8,590	20.0	1.0	1.3	15.6	2.5	5.4	19.1	8.5	10.3	45.3	84.4	64.4	0.0	3.5	18.6
FL-Cape Coral MSA	900	182,219	3.8	55,246	20.7	5.4	3.8	18.5	19.9	15.4	19.7	19.8	19.9	41.1	53.7	44.3	0.0	1.2	16.6
FL-Crestview MSA	411	205,387	1.7	26,714	20.3	1.9	3.6	17.9	15.3	12.5	21.5	15.1	15.9	40.3	65.5	41.5	0.0	2.2	26.5
FL-Deltona MSA	1,141	194,982	4.8	45,261	19.1	6.7	5.0	19.1	20.9	16.2	21.0	19.5	21.2	40.8	50.9	38.8	0.0	2.0	18.8
FL-Fort Lauderdale MD	1,584	590,130	6.6	87,745	22.3	4.1	2.5	17.3	11.6	10.7	18.7	17.6	19.8	41.7	64.3	49.5	0.0	2.5	17.6
FL-Gainesville MSA	291	72,525	1.2	13,120	23.6	1.4	4.9	16.2	14.8	14.3	19.1	14.4	20.5	41.1	68.4	44.3	0.0	1.0	16.1
FL-Homosassa Springs MSA	412	70,855	1.7	9,282	18.2	5.8	4.4	19.4	15.3	13.9	22.5	18.9	19.6	39.9	58.0	42.8	0.0	1.9	19.3
FL-Jacksonville MSA	1,691	746,356	7.1	104,002	21.8	4.1	4.4	17.4	15.5	13.8	20.0	16.7	19.5	40.9	61.6	39.7	0.0	2.1	22.6
FL-Lakeland MSA	638	125,812	2.7	44,340	20.4	4.7	3.0	18.3	19.4	13.5	21.4	21.5	23.4	39.8	52.2	35.2	0.0	2.2	24.9
FL-Miami MD	1,377	630,282	5.8	92,934	24.0	0.7	1.1	16.6	6.2	5.1	16.9	15.1	15.7	42.6	76.0	58.4	0.0	2.0	19.7
FL-Naples MSA	479	180,912	2.0	27,642	20.8	2.3	3.2	17.7	10.0	12.4	19.3	19.0	17.6	42.2	67.9	53.7	0.0	0.8	13.0
FL-North Port MSA	1,567	499,782	6.5	59,444	19.4	6.1	4.8	19.1	18.0	14.8	21.0	19.6	20.2	40.5	54.5	46.0	0.0	1.8	14.2
FL-Ocala MSA	554	84,915	2.3	21,434	19.3	5.1	3.8	19.5	16.1	14.8	21.6	29.1	21.6	39.7	47.8	39.1	0.0	2.0	20.8
FL-Orlando MSA	3,332	1,073,186	13.9	146,602	21.5	4.9	3.7	18.1	17.4	13.3	19.2	18.5	20.0	41.2	57.0	43.5	0.0	2.3	19.4
FL-Palm Bay MSA	1,011	233,729	4.2	40,168	20.2	7.7	6.7	18.6	22.2	17.1	20.6	18.6	20.0	40.6	50.0	35.9	0.0	1.6	20.3

Florida: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FL-Panama City MSA	125	30,048	0.5	12,927	21.1	6.4	3.3	17.7	12.0	11.2	19.9	17.6	17.4	41.3	58.4	44.3	0.0	5.6	23.8
FL-Pensacola MSA	477	134,307	2.0	31,843	18.6	7.3	4.6	19.1	21.2	14.9	22.7	26.4	19.8	39.7	42.1	33.3	0.0	2.9	27.4
FL-Port St Lucie MSA	600	121,738	2.5	35,802	19.8	6.0	3.6	18.7	19.5	15.7	19.9	20.0	22.0	41.6	52.0	39.1	0.0	2.5	19.6
FL-Punta Gorda MSA	407	72,718	1.7	15,352	17.3	4.4	4.8	20.7	17.2	15.0	21.8	24.1	20.8	40.2	53.1	43.1	0.0	1.2	16.3
FL-Sebastian MSA	173	41,154	0.7	10,330	20.6	8.7	7.3	18.6	30.6	19.7	18.6	15.0	20.3	42.2	45.1	36.9	0.0	0.6	15.9
FL-Sebring MSA	96	12,416	0.4	4,763	16.6	4.2	3.7	20.3	11.5	13.2	21.6	31.3	20.9	41.4	52.1	41.0	0.0	1.0	21.2
FL-Tallahassee MSA	471	100,461	2.0	15,513	23.4	6.8	6.4	16.7	19.3	18.4	19.6	21.4	21.1	40.2	51.2	37.4	0.0	1.3	16.6
FL-Tampa MSA	4,281	1,207,211	17.9	190,203	21.6	4.7	4.7	17.9	17.4	15.2	19.1	19.3	20.1	41.4	56.7	41.6	0.0	1.9	18.4
FL-The Villages MSA	211	42,244	0.9	10,070	15.5	6.6	3.2	20.8	18.0	12.6	24.3	24.2	21.5	39.5	50.2	51.9	0.0	0.9	10.9
FL-West Palm Beach MD	1,502	453,708	6.3	78,210	22.8	5.5	3.9	17.3	14.8	13.4	17.8	17.2	18.6	42.1	61.5	48.2	0.0	1.1	15.8
<b>Total</b>	<b>23,930</b>	<b>7,269,643</b>	<b>100.0</b>	<b>1,187,537</b>	<b>21.5</b>	<b>4.8</b>	<b>3.9</b>	<b>17.8</b>	<b>16.4</b>	<b>13.4</b>	<b>19.4</b>	<b>18.9</b>	<b>19.6</b>	<b>41.3</b>	<b>57.9</b>	<b>44.0</b>	<b>0.0</b>	<b>1.9</b>	<b>19.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Florida: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography															2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FL Non-MSA	373	24,856	1.0	7,739	0.8	3.8	0.9	10.7	16.1	10.3	30.4	33.5	29.4	58.1	46.6	59.4	
FL-Cape Coral MSA	1,536	48,997	4.0	27,526	2.9	2.5	2.6	22.8	24.7	23.8	41.0	41.9	40.7	33.1	30.9	32.9	
FL-Crestview MSA	275	6,233	0.7	10,454	0.0	0.0	0.0	10.1	11.6	9.2	53.2	49.5	49.2	36.7	38.9	41.6	
FL-Deltona MSA	1,783	62,634	4.6	19,235	2.1	2.3	2.0	18.4	19.0	18.9	55.8	51.4	54.6	23.7	27.3	24.5	
FL-Fort Lauderdale MD	3,944	187,887	10.2	124,849	4.9	6.4	5.5	25.0	27.0	25.4	30.6	27.7	30.2	39.6	38.9	38.9	
FL-Gainesville MSA	286	11,029	0.7	7,728	6.1	3.8	6.6	24.1	18.2	22.7	35.3	37.1	35.1	33.6	40.6	35.0	
FL-Homosassa Springs MSA	428	11,882	1.1	3,365	0.0	0.0	0.0	16.8	14.7	14.2	62.2	66.4	63.3	21.0	18.9	22.5	
FL-Jacksonville MSA	1,493	71,902	3.9	47,171	4.3	3.0	4.3	21.8	19.6	21.4	34.9	35.1	33.7	39.0	42.3	40.7	
FL-Lakeland MSA	1,146	30,166	3.0	16,199	3.8	3.3	4.2	19.7	20.9	19.5	54.2	52.8	55.5	22.3	23.0	20.7	
FL-Miami MD	4,452	192,862	11.5	185,168	3.1	2.4	3.1	20.8	20.0	22.3	26.3	25.7	27.0	47.5	50.2	45.4	
FL-Naples MSA	610	16,753	1.6	17,665	2.8	3.9	3.0	14.3	13.1	12.7	37.9	41.3	39.8	45.1	41.6	44.4	
FL-North Port MSA	2,097	78,126	5.4	31,452	1.4	1.3	1.2	19.6	18.0	17.6	43.6	42.1	42.8	35.4	38.5	38.4	
FL-Ocala MSA	656	23,086	1.7	9,210	1.8	1.1	1.7	16.6	15.7	16.2	63.4	66.5	65.9	18.2	16.8	16.2	
FL-Orlando MSA	5,513	226,700	14.2	103,416	1.7	1.2	1.8	26.1	22.8	24.9	35.1	33.6	35.5	37.1	42.4	37.8	
FL-Palm Bay MSA	1,384	55,809	3.6	16,731	2.7	3.3	2.4	23.2	21.3	23.5	39.0	40.5	38.4	35.0	35.0	35.7	
FL-Panama City MSA	252	9,054	0.7	5,980	3.2	2.0	2.6	16.8	16.7	15.6	54.0	50.8	53.5	25.9	30.6	28.4	
FL-Pensacola MSA	345	13,362	0.9	11,796	2.3	0.6	2.3	19.5	18.6	18.9	50.9	48.7	49.8	27.3	32.2	29.0	
FL-Port St Lucie MSA	880	26,843	2.3	17,512	3.1	3.0	2.8	18.6	19.4	18.7	48.9	46.0	49.0	29.4	31.4	29.3	
FL-Punta Gorda MSA	460	8,618	1.2	5,297	0.0	0.0	0.0	16.2	18.0	16.5	65.6	64.6	66.8	18.1	17.4	16.7	
FL-Sebastian MSA	223	6,491	0.6	5,516	6.4	4.9	7.0	13.7	17.9	14.7	47.1	50.2	45.2	32.7	26.9	32.7	

Florida: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography															2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FL-Sebring MSA	152	1,870	0.4	1,905	0.0	0.0	0.0	7.8	9.2	9.7	75.2	71.1	72.5	16.6	18.4	17.1	
FL-Tallahassee MSA	382	17,808	1.0	9,594	8.5	6.0	7.6	21.0	22.3	22.6	40.4	35.6	41.3	28.7	35.6	27.8	
FL-Tampa MSA	6,795	224,960	17.5	111,679	4.2	3.6	4.5	20.7	20.9	20.5	34.1	36.6	34.6	40.7	38.7	40.2	
FL-The Villages MSA	199	6,234	0.5	2,129	1.5	5.0	3.0	34.4	39.2	35.8	63.9	55.8	61.0	0.0	0.0	0.0	
FL-West Palm Beach MD	3,077	130,236	7.9	85,459	5.3	5.5	5.8	21.6	20.5	23.4	29.3	30.2	29.4	43.1	43.4	40.9	
<b>Total</b>	<b>38,741</b>	<b>1,494,398</b>	<b>100.0</b>	<b>884,775</b>	<b>3.5</b>	<b>3.1</b>	<b>3.7</b>	<b>21.5</b>	<b>21.1</b>	<b>21.9</b>	<b>35.6</b>	<b>37.3</b>	<b>35.1</b>	<b>38.9</b>	<b>38.3</b>	<b>38.8</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Florida: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FL Non-MSA	373	24,856	1.0	7,739	91.4	74.8	40.9	2.2	20.1	6.4	5.1
FL-Cape Coral MSA	1,536	48,997	4.0	27,526	93.2	80.7	45.8	2.0	17.4	4.8	1.9
FL-Crestview MSA	275	6,233	0.7	10,454	92.4	77.1	43.0	1.8	12.7	5.8	10.2
FL-Deltona MSA	1,783	62,634	4.6	19,235	93.3	80.9	50.5	1.8	15.6	4.9	3.5
FL-Fort Lauderdale MD	3,944	187,887	10.2	124,849	94.3	74.2	43.4	1.9	21.1	3.8	4.7
FL-Gainesville MSA	286	11,029	0.7	7,728	90.6	74.5	44.6	2.4	18.9	7.1	6.6
FL-Homosassa Springs MSA	428	11,882	1.1	3,365	92.8	84.6	52.3	1.8	12.6	5.4	2.8
FL-Jacksonville MSA	1,493	71,902	3.9	47,171	92.2	75.2	43.5	2.2	21.9	5.6	2.9
FL-Lakeland MSA	1,146	30,166	3.0	16,199	92.5	76.7	44.9	2.1	17.6	5.4	5.7
FL-Miami MD	4,452	192,862	11.5	185,168	94.7	76.5	42.2	1.8	20.6	3.5	3.0
FL-Naples MSA	610	16,753	1.6	17,665	93.5	79.3	46.8	2.0	16.4	4.4	4.3
FL-North Port MSA	2,097	78,126	5.4	31,452	93.1	82.7	50.1	2.1	15.4	4.8	1.9
FL-Ocala MSA	656	23,086	1.7	9,210	92.6	77.3	46.9	2.1	14.8	5.3	7.9
FL-Orlando MSA	5,513	226,700	14.2	103,416	93.4	81.0	45.3	1.8	17.2	4.8	1.8
FL-Palm Bay MSA	1,384	55,809	3.6	16,731	92.1	74.0	47.5	2.2	19.0	5.7	7.0
FL-Panama City MSA	252	9,054	0.7	5,980	91.5	71.4	40.8	2.1	23.4	6.4	5.2
FL-Pensacola MSA	345	13,362	0.9	11,796	92.0	80.6	44.4	2.1	18.0	5.9	1.4
FL-Port St Lucie MSA	880	26,843	2.3	17,512	93.5	79.9	44.9	1.8	16.0	4.8	4.1
FL-Punta Gorda MSA	460	8,618	1.2	5,297	93.2	77.6	48.4	1.8	15.7	4.9	6.7
FL-Sebastian MSA	223	6,491	0.6	5,516	92.6	86.5	45.7	2.3	13.0	5.1	0.4
FL-Sebring MSA	152	1,870	0.4	1,905	93.1	82.9	50.0	1.9	8.6	5.1	8.6
FL-Tallahassee MSA	382	17,808	1.0	9,594	91.0	83.2	45.8	2.2	14.7	6.8	2.1
FL-Tampa MSA	6,795	224,960	17.5	111,679	92.9	74.0	46.6	2.1	19.1	4.9	6.9
FL-The Villages MSA	199	6,234	0.5	2,129	91.2	74.9	47.0	2.0	18.1	6.8	7.0

Florida: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FL-West Palm Beach MD	3,077	130,236	7.9	85,459	93.9	75.4	43.5	2.0	21.3	4.2	3.3
<b>Total</b>	<b>38,741</b>	<b>1,494,398</b>	<b>100.0</b>	<b>884,775</b>	<b>93.5</b>	<b>77.3</b>	<b>44.6</b>	<b>2.0</b>	<b>18.6</b>	<b>4.6</b>	<b>4.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Florida: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FL-Non-MSA	3	271	7.0	193	0.5	0.0	0.0	16.7	0.0	8.3	52.1	0.0	59.1	30.7	100.0	32.6	0.0	0.0	0.0
FL-Cape Coral MSA	3	303	7.0	103	3.2	0.0	1.0	26.6	0.0	20.4	46.4	66.7	46.6	23.8	33.3	32.0	0.0	0.0	0.0
FL-Crestview MSA	0	0	0.0	77	0.0	0.0	0.0	15.2	0.0	23.4	62.7	0.0	46.8	22.1	0.0	29.9	0.0	0.0	0.0
FL-Deltona MSA	2	378	4.7	89	1.2	0.0	0.0	17.6	50.0	23.6	60.3	50.0	47.2	20.9	0.0	29.2	0.0	0.0	0.0
FL-Fort Lauderdale MD	2	321	4.7	146	5.4	0.0	4.8	29.4	50.0	11.0	29.1	0.0	34.9	36.1	50.0	49.3	0.0	0.0	0.0
FL-Gainesville MSA	0	0	0.0	172	2.7	0.0	0.0	25.3	0.0	43.0	48.7	0.0	46.5	23.0	0.0	10.5	0.2	0.0	0.0
FL-Homosassa Springs MSA	0	0	0.0	13	0.0	0.0	0.0	19.0	0.0	0.0	62.9	0.0	100.0	18.1	0.0	0.0	0.0	0.0	0.0
FL-Jacksonville MSA	2	220	4.7	146	3.4	0.0	0.7	21.2	0.0	21.9	44.2	0.0	52.7	31.2	100.0	24.7	0.0	0.0	0.0
FL-Lakeland MSA	1	108	2.3	121	2.6	0.0	0.8	17.9	0.0	10.7	59.6	100.0	63.6	19.9	0.0	24.8	0.0	0.0	0.0
FL-Miami MD	5	118	11.6	414	3.9	0.0	2.7	23.7	20.0	9.9	27.1	60.0	27.3	44.5	20.0	59.9	0.8	0.0	0.2
FL-Naples MSA	1	23	2.3	60	5.6	0.0	8.3	21.3	0.0	26.7	42.9	100.0	38.3	30.2	0.0	26.7	0.0	0.0	0.0
FL-North Port MSA	1	21	2.3	114	2.3	0.0	0.0	20.2	0.0	9.6	44.1	0.0	34.2	33.3	100.0	56.1	0.0	0.0	0.0
FL-Ocala MSA	3	58	7.0	151	1.0	0.0	0.7	17.8	33.3	14.6	67.7	66.7	72.2	13.5	0.0	12.6	0.0	0.0	0.0
FL-Orlando MSA	7	604	16.3	273	1.2	0.0	0.0	25.0	28.6	12.1	41.1	57.1	48.0	32.5	14.3	39.6	0.2	0.0	0.4
FL-Palm Bay MSA	1	49	2.3	54	3.6	0.0	0.0	25.5	0.0	16.7	42.8	100.0	50.0	28.1	0.0	33.3	0.0	0.0	0.0
FL-Panama City MSA	0	0	0.0	32	2.8	0.0	0.0	13.4	0.0	0.0	56.3	0.0	78.1	27.5	0.0	21.9	0.0	0.0	0.0
FL-Pensacola MSA	1	401	2.3	73	1.9	0.0	0.0	14.6	0.0	5.5	59.9	100.0	80.8	23.6	0.0	13.7	0.0	0.0	0.0
FL-Port St Lucie MSA	3	128	7.0	115	3.4	0.0	0.9	25.0	66.7	21.7	46.0	0.0	45.2	25.6	33.3	32.2	0.0	0.0	0.0
FL-Punta Gorda MSA	0	0	0.0	28	0.0	0.0	0.0	25.5	0.0	39.3	62.8	0.0	21.4	11.7	0.0	39.3	0.0	0.0	0.0

Florida: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FL-Sebastian MSA	0	0	0.0	41	2.4	0.0	0.0	24.3	0.0	36.6	53.0	0.0	34.1	20.1	0.0	29.3	0.3	0.0	0.0
FL-Sebring MSA	0	0	0.0	49	0.0	0.0	0.0	3.9	0.0	4.1	72.7	0.0	73.5	22.5	0.0	22.4	0.9	0.0	0.0
FL-Tallahassee MSA	1	34	2.3	80	4.7	0.0	5.0	16.7	0.0	22.5	48.4	100.0	55.0	29.6	0.0	15.0	0.5	0.0	2.5
FL-Tampa MSA	5	1,072	11.6	294	3.1	0.0	2.0	24.8	40.0	23.5	38.9	40.0	36.1	33.1	20.0	38.4	0.1	0.0	0.0
FL-The Villages MSA	0	0	0.0	30	1.7	0.0	3.3	53.8	0.0	53.3	44.2	0.0	43.3	0.0	0.0	0.0	0.2	0.0	0.0
FL-West Palm Beach MD	2	302	4.7	289	6.1	0.0	2.8	23.3	50.0	11.4	32.7	0.0	33.6	37.5	50.0	52.2	0.4	0.0	0.0
<b>Total</b>	<b>43</b>	<b>4,411</b>	<b>100.0</b>	<b>3,157</b>	<b>3.1</b>	<b>0.0</b>	<b>1.5</b>	<b>22.8</b>	<b>25.6</b>	<b>17.0</b>	<b>43.5</b>	<b>44.2</b>	<b>45.4</b>	<b>30.4</b>	<b>30.2</b>	<b>36.0</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Florida: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
FL Non-MSA	3	271	7.0	193	95.7	33.3	50.8	2.6	66.7	1.7	0.0	
FL-Cape Coral MSA	3	303	7.0	103	97.7	100.0	65.0	1.3	0.0	1.0	0.0	
FL-Crestview MSA	--	--	--	77	97.8	--	41.6	1.1	--	1.2	--	
FL-Deltona MSA	2	378	4.7	89	98.2	50.0	73.0	1.0	50.0	0.8	0.0	
FL-Fort Lauderdale MD	2	321	4.7	146	97.7	50.0	69.2	1.3	50.0	1.0	0.0	
FL-Gainesville MSA	--	--	--	172	96.6	--	51.7	1.9	--	1.5	--	
FL-Homosassa Springs MSA	--	--	--	13	99.3	--	61.5	0.3	--	0.4	--	
FL-Jacksonville MSA	2	220	4.7	146	98.0	100.0	53.4	1.1	0.0	0.9	0.0	
FL-Lakeland MSA	1	108	2.3	121	96.9	100.0	62.8	2.0	0.0	1.1	0.0	
FL-Miami MD	5	118	11.6	414	97.7	80.0	72.5	1.5	20.0	0.8	0.0	
FL-Naples MSA	1	23	2.3	60	96.2	100.0	68.3	2.6	0.0	1.2	0.0	
FL-North Port MSA	1	21	2.3	114	97.2	100.0	65.8	1.7	0.0	1.1	0.0	
FL-Ocala MSA	3	58	7.0	151	98.3	100.0	68.9	1.1	0.0	0.6	0.0	
FL-Orlando MSA	7	604	16.3	273	97.1	85.7	64.1	1.7	14.3	1.2	0.0	
FL-Palm Bay MSA	1	49	2.3	54	98.4	100.0	63.0	1.0	0.0	0.6	0.0	
FL-Panama City MSA	--	--	--	32	98.2	--	34.4	0.9	--	1.0	--	
FL-Pensacola MSA	1	401	2.3	73	98.8	100.0	41.1	0.5	0.0	0.7	0.0	
FL-Port St Lucie MSA	3	128	7.0	115	97.1	100.0	65.2	1.8	0.0	1.1	0.0	
FL-Punta Gorda MSA	--	--	--	28	98.3	--	82.1	0.4	--	1.3	--	
FL-Sebastian MSA	--	--	--	41	96.1	--	70.7	2.8	--	1.1	--	
FL-Sebring MSA	--	--	--	49	93.5	--	51.0	4.6	--	2.0	--	
FL-Tallahassee MSA	1	34	2.3	80	97.8	100.0	72.5	1.3	0.0	0.9	0.0	
FL-Tampa MSA	5	1,072	11.6	294	97.6	60.0	61.9	1.4	40.0	1.1	0.0	
FL-The Villages MSA	--	--	--	30	96.5	--	63.3	1.3	--	2.2	--	

Florida: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FL-West Palm Beach MD	2	302	4.7	289	97.2	100.0	63.3	1.8	0.0	1.0	0.0
<b>Total</b>	<b>43</b>	<b>4,411</b>	<b>100.0</b>	<b>3,157</b>	<b>97.5</b>	<b>81.4</b>	<b>62.7</b>	<b>1.5</b>	<b>18.6</b>	<b>1.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



North Carolina: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
NC Non-MSA	3,009	631,548	16.3	67,370	0.6	0.1	0.2	18.4	9.6	9.9	58.2	50.0	48.2	22.9	40.3	41.7	0.0	0.0	0.0	
NC-Asheville MSA	848	265,730	4.6	27,880	1.3	1.3	1.4	12.1	10.8	11.4	64.2	58.0	62.6	22.4	29.8	24.6	0.0	0.0	0.0	
NC-Burlington MSA	270	43,176	1.5	8,767	0.0	0.0	0.0	22.9	11.1	17.4	47.8	50.0	50.8	29.3	38.9	31.7	0.0	0.0	0.0	
NC-Durham MSA	2,440	690,584	13.2	39,343	3.0	3.1	3.1	19.7	15.4	14.4	38.5	32.0	38.3	38.8	49.5	44.3	0.0	0.0	0.0	
NC-Fayetteville MSA	696	116,853	3.8	30,640	0.5	0.1	0.1	12.2	9.6	7.4	64.3	60.8	60.4	23.0	29.5	32.0	0.0	0.0	0.0	
NC-Goldsboro MSA	214	32,552	1.2	4,522	0.0	0.0	0.0	26.7	15.9	19.2	56.0	58.4	55.8	17.3	25.7	25.0	0.0	0.0	0.0	
NC-Greensboro MSA	1,640	419,110	8.9	34,585	2.7	1.6	1.7	17.2	10.8	13.5	45.8	36.3	41.7	34.3	51.2	43.2	0.0	0.0	0.0	
NC-Greenville MSA	574	121,152	3.1	7,847	4.5	6.3	5.8	19.5	9.6	11.1	40.3	42.0	43.0	35.7	42.2	40.1	0.0	0.0	0.0	
NC-Hickory MSA	898	141,116	4.9	16,558	0.0	0.0	0.0	10.5	8.5	9.4	67.5	63.8	61.1	22.0	27.7	29.4	0.0	0.0	0.0	
NC-Jacksonville MSA	155	32,972	0.8	15,319	0.0	0.0	0.0	3.8	0.0	2.7	76.3	72.9	79.4	19.9	27.1	17.9	0.0	0.0	0.0	
NC-New Bern MSA	284	61,440	1.5	6,881	2.1	2.5	2.4	13.3	8.1	6.8	53.7	48.9	46.8	30.9	40.5	44.0	0.0	0.0	0.0	
NC-Raleigh MSA	4,848	1,456,061	26.3	112,687	3.0	2.6	2.1	26.6	22.5	21.8	35.2	34.1	37.2	35.2	40.7	38.9	0.0	0.0	0.0	
NC-Rocky Mount MSA	238	38,525	1.3	4,919	0.0	0.0	0.0	15.7	5.0	8.4	58.5	50.0	58.1	25.8	45.0	33.5	0.0	0.0	0.0	
NC-Wilmington MSA	739	281,850	4.0	22,969	4.9	5.7	4.4	14.4	5.5	7.8	44.4	44.4	47.1	36.3	44.4	40.7	0.0	0.0	0.0	
NC-Winston-Salem MSA	1,609	328,821	8.7	32,715	3.3	1.7	2.2	15.8	10.3	12.0	44.9	41.2	41.7	35.9	46.8	44.1	0.0	0.1	0.1	

<b>North Carolina: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
<b>Total</b>	<b>18,462</b>	<b>4,661,490</b>	<b>100.0</b>	<b>433,002</b>	<b>1.9</b>	<b>1.9</b>	<b>1.6</b>	<b>17.9</b>	<b>13.7</b>	<b>13.6</b>	<b>50.8</b>	<b>42.7</b>	<b>46.9</b>	<b>29.4</b>	<b>41.6</b>	<b>37.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

North Carolina: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NC Non-MSA	3,009	631,548	16.3	67,370	22.6	2.8	2.3	17.8	12.5	10.5	19.1	18.5	17.0	40.6	63.4	52.6	0.0	2.9	17.6
NC-Asheville MSA	848	265,730	4.6	27,880	20.2	3.8	6.0	18.6	19.7	16.9	20.5	17.9	21.9	40.7	56.0	41.9	0.0	2.6	13.3
NC-Burlington MSA	270	43,176	1.5	8,767	21.8	7.0	6.0	17.8	18.9	18.0	18.3	22.6	22.2	42.1	47.0	37.8	0.0	4.4	15.9
NC-Durham MSA	2,440	690,584	13.2	39,343	22.6	4.1	4.3	16.5	20.0	15.1	17.8	18.3	18.9	43.0	56.5	47.9	0.0	1.2	13.8
NC-Fayetteville MSA	696	116,853	3.8	30,640	20.7	6.3	2.1	17.3	19.0	9.7	19.1	19.5	17.0	42.9	49.0	31.6	0.0	6.2	39.5
NC-Goldsboro MSA	214	32,552	1.2	4,522	22.8	2.3	1.5	17.9	11.7	8.4	19.4	17.8	19.5	39.9	63.1	45.3	0.0	5.1	25.2
NC-Greensboro MSA	1,640	419,110	8.9	34,585	21.7	6.9	5.4	18.3	17.4	17.0	18.4	18.7	20.7	41.7	51.6	41.6	0.0	5.4	15.3
NC-Greenville MSA	574	121,152	3.1	7,847	24.2	2.1	2.5	16.2	16.0	11.4	17.5	18.8	19.8	42.1	60.3	47.6	0.0	2.8	18.6
NC-Hickory MSA	898	141,116	4.9	16,558	20.8	7.9	5.2	17.8	18.7	17.3	21.1	19.9	20.4	40.3	51.1	41.0	0.0	2.3	16.0
NC-Jacksonville MSA	155	32,972	0.8	15,319	18.2	1.9	2.0	18.6	16.1	9.9	23.9	19.4	19.4	39.3	55.5	30.4	0.0	7.1	38.4
NC-New Bern MSA	284	61,440	1.5	6,881	20.1	6.7	4.0	19.2	13.0	13.3	19.3	20.8	21.2	41.3	55.6	38.2	0.0	3.9	23.3
NC-Raleigh MSA	4,848	1,456,061	26.3	112,687	22.3	8.3	6.6	17.4	23.0	17.1	19.2	19.6	20.9	41.2	46.8	40.2	0.0	2.3	15.3
NC-Rocky Mount MSA	238	38,525	1.3	4,919	22.5	6.3	5.1	16.8	17.2	15.9	19.4	24.4	23.4	41.3	46.6	36.5	0.0	5.5	19.1
NC-Wilmington MSA	739	281,850	4.0	22,969	22.7	4.5	4.0	17.6	16.8	14.0	18.4	19.8	18.0	41.3	56.3	46.4	0.0	2.7	17.7
NC-Winston-Salem MSA	1,609	328,821	8.7	32,715	22.4	7.6	5.5	17.6	18.1	17.2	19.0	19.0	21.1	41.1	48.4	41.3	0.0	6.9	14.8
<b>Total</b>	<b>18,462</b>	<b>4,661,490</b>	<b>100.0</b>	<b>433,002</b>	<b>21.9</b>	<b>5.8</b>	<b>4.6</b>	<b>17.7</b>	<b>18.5</b>	<b>14.7</b>	<b>19.2</b>	<b>19.1</b>	<b>19.7</b>	<b>41.2</b>	<b>53.3</b>	<b>42.6</b>	<b>0.0</b>	<b>3.3</b>	<b>18.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**North Carolina: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NC Non-MSA	4,364	288,004	21.0	32,373	1.4	1.3	0.9	19.3	19.5	17.0	50.2	50.8	50.7	29.1	28.4	31.5
NC-Asheville MSA	1,004	71,626	4.8	13,944	2.9	2.0	2.9	15.3	17.3	16.5	53.9	54.2	53.7	27.9	26.5	27.0
NC-Burlington MSA	342	26,241	1.6	3,729	0.0	0.0	0.0	24.8	21.3	25.8	48.4	52.9	48.7	26.7	25.7	25.5
NC-Durham MSA	1,921	115,239	9.2	16,998	6.8	4.0	5.9	18.6	18.7	18.2	33.6	39.6	35.9	39.7	37.2	39.2
NC-Fayetteville MSA	1,315	57,063	6.3	9,186	1.6	1.6	1.6	18.0	17.2	15.6	59.4	55.6	59.8	20.9	25.6	23.0
NC-Goldsboro MSA	317	25,533	1.5	1,910	0.0	0.0	0.0	35.3	29.0	31.1	53.0	50.2	55.0	11.8	20.8	13.9
NC-Greensboro MSA	2,227	141,159	10.7	20,298	4.1	3.9	4.0	21.8	22.4	22.6	36.3	38.5	37.4	37.7	35.2	35.9
NC-Greenville MSA	438	36,359	2.1	3,586	16.1	12.3	13.3	16.0	17.8	16.0	36.9	40.9	38.9	31.0	29.0	31.8
NC-Hickory MSA	955	68,165	4.6	7,039	0.0	0.0	0.0	14.4	15.3	15.0	58.2	59.6	57.9	27.4	25.1	27.1
NC-Jacksonville MSA	174	11,796	0.8	3,010	0.0	0.0	0.0	11.1	10.3	8.6	68.7	67.8	71.7	19.5	21.8	19.6
NC-New Bern MSA	490	38,193	2.4	2,490	8.2	8.0	7.3	9.7	7.6	12.7	53.5	55.3	52.2	28.6	29.2	27.9
NC-Raleigh MSA	3,845	275,053	18.5	44,716	4.3	4.1	4.0	23.8	24.2	23.6	33.4	35.9	34.8	38.4	35.7	37.6
NC-Rocky Mount MSA	270	27,703	1.3	2,476	0.0	0.0	0.0	13.9	11.9	14.7	65.2	65.2	62.9	20.9	23.0	22.4
NC-Wilmington MSA	1,217	73,275	5.9	11,214	12.2	9.9	11.4	11.1	9.9	11.3	34.9	46.4	38.6	41.6	33.8	38.5
NC-Winston-Salem MSA	1,913	158,536	9.2	15,151	6.0	5.8	5.4	17.4	15.0	16.5	37.6	43.5	40.0	38.4	35.2	37.5
<b>Total</b>	<b>20,792</b>	<b>1,413,945</b>	<b>100.0</b>	<b>188,120</b>	<b>4.2</b>	<b>3.6</b>	<b>3.8</b>	<b>19.3</b>	<b>18.9</b>	<b>18.8</b>	<b>42.8</b>	<b>45.9</b>	<b>43.8</b>	<b>33.5</b>	<b>31.5</b>	<b>33.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**North Carolina: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NC Non-MSA	4,364	288,004	21.0	32,373	85.3	68.2	51.7	3.9	24.9	10.9	7.0
NC-Asheville MSA	1,004	71,626	4.8	13,944	89.8	70.9	49.7	3.0	26.1	7.2	3.0
NC-Burlington MSA	342	26,241	1.6	3,729	85.9	71.9	47.7	4.1	26.3	10.0	1.8
NC-Durham MSA	1,921	115,239	9.2	16,998	88.7	75.8	48.6	3.2	20.7	8.1	3.4
NC-Fayetteville MSA	1,315	57,063	6.3	9,186	88.5	73.6	48.2	2.7	21.1	8.8	5.2
NC-Goldsboro MSA	317	25,533	1.5	1,910	84.9	68.1	47.6	3.9	28.4	11.2	3.5
NC-Greensboro MSA	2,227	141,159	10.7	20,298	87.1	70.4	48.2	4.0	25.9	9.0	3.8
NC-Greenville MSA	438	36,359	2.1	3,586	86.5	73.7	49.9	3.4	25.1	10.1	1.1
NC-Hickory MSA	955	68,165	4.6	7,039	84.5	65.8	49.0	4.9	27.2	10.6	7.0
NC-Jacksonville MSA	174	11,796	0.8	3,010	87.6	77.6	52.0	2.5	20.7	9.9	1.7
NC-New Bern MSA	490	38,193	2.4	2,490	85.6	71.8	54.1	3.5	25.5	10.9	2.7
NC-Raleigh MSA	3,845	275,053	18.5	44,716	89.5	70.0	46.7	3.0	26.2	7.6	3.7
NC-Rocky Mount MSA	270	27,703	1.3	2,476	84.4	57.8	42.7	4.3	39.6	11.3	2.6
NC-Wilmington MSA	1,217	73,275	5.9	11,214	88.7	65.7	47.1	3.3	33.0	8.0	1.4
NC-Winston-Salem MSA	1,913	158,536	9.2	15,151	87.5	70.2	51.0	3.9	28.4	8.6	1.5
<b>Total</b>	<b>20,792</b>	<b>1,413,945</b>	<b>100.0</b>	<b>188,120</b>	<b>87.7</b>	<b>70.1</b>	<b>48.9</b>	<b>3.5</b>	<b>25.8</b>	<b>8.9</b>	<b>4.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**North Carolina: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
NC Non-MSA	227	28,778	53.2	2,115	0.3	0.0	0.0	17.4	18.5	21.9	61.6	58.2	66.1	20.7	23.3	11.9	0.0	0.0	0.0
NC-Asheville MSA	3	86	0.7	116	1.2	0.0	0.9	15.9	33.3	23.3	63.2	66.7	62.1	19.7	0.0	13.8	0.0	0.0	0.0
NC-Burlington MSA	4	248	0.9	51	0.0	0.0	0.0	17.6	0.0	15.7	53.7	100.0	60.8	28.7	0.0	23.5	0.0	0.0	0.0
NC-Durham MSA	22	1,313	5.2	289	2.9	0.0	1.4	20.5	36.4	30.8	50.2	40.9	54.0	26.4	22.7	13.8	0.1	0.0	0.0
NC-Fayetteville MSA	17	1,023	4.0	115	0.4	0.0	0.0	12.4	23.5	20.0	63.8	76.5	56.5	23.4	0.0	23.5	0.1	0.0	0.0
NC-Goldsboro MSA	37	5,093	8.7	162	0.0	0.0	0.0	17.0	10.8	12.3	64.9	67.6	73.5	18.1	21.6	14.2	0.0	0.0	0.0
NC-Greensboro MSA	13	1,057	3.0	323	2.2	0.0	0.0	14.2	7.7	14.6	50.6	53.8	69.4	33.1	38.5	16.1	0.0	0.0	0.0
NC-Greenville MSA	1	60	0.2	109	4.9	0.0	1.8	15.9	0.0	16.5	43.5	0.0	48.6	35.7	100.0	33.0	0.0	0.0	0.0
NC-Hickory MSA	9	184	2.1	134	0.0	0.0	0.0	10.0	11.1	10.4	68.0	55.6	78.4	22.0	33.3	11.2	0.0	0.0	0.0
NC-Jacksonville MSA	1	230	0.2	48	0.0	0.0	0.0	6.2	0.0	0.0	76.8	100.0	100.0	16.9	0.0	0.0	0.0	0.0	0.0
NC-New Bern MSA	23	1,777	5.4	112	2.0	0.0	0.0	16.1	13.0	24.1	56.5	65.2	66.1	25.4	21.7	9.8	0.0	0.0	0.0
NC-Raleigh MSA	32	4,199	7.5	312	4.6	3.1	9.0	28.4	56.3	48.1	39.5	25.0	27.2	27.5	15.6	15.7	0.0	0.0	0.0
NC-Rocky Mount MSA	9	942	2.1	132	0.0	0.0	0.0	7.2	0.0	4.5	68.4	77.8	75.8	24.5	22.2	19.7	0.0	0.0	0.0
NC-Wilmington MSA	9	718	2.1	105	8.3	0.0	12.4	22.9	55.6	45.7	38.5	11.1	21.9	30.2	33.3	20.0	0.1	0.0	0.0
NC-Winston-Salem MSA	20	1,119	4.7	221	2.1	15.0	1.4	15.6	10.0	26.2	47.6	45.0	58.8	34.4	30.0	13.6	0.3	0.0	0.0
<b>Total</b>	<b>427</b>	<b>46,827</b>	<b>100.0</b>	<b>4,344</b>	<b>2.0</b>	<b>0.9</b>	<b>1.2</b>	<b>18.0</b>	<b>20.8</b>	<b>23.0</b>	<b>54.6</b>	<b>55.7</b>	<b>61.8</b>	<b>25.4</b>	<b>22.5</b>	<b>14.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

North Carolina: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
NC Non-MSA	227	28,778	53.2	2,115	96.6	62.6	44.3	1.7	36.1	1.7	1.3
NC-Asheville MSA	3	86	0.7	116	97.8	100.0	53.4	1.2	0.0	1.0	0.0
NC-Burlington MSA	4	248	0.9	51	98.3	50.0	66.7	1.5	50.0	0.2	0.0
NC-Durham MSA	22	1,313	5.2	289	97.6	86.4	54.7	1.4	13.6	1.0	0.0
NC-Fayetteville MSA	17	1,023	4.0	115	96.7	100.0	63.5	1.8	0.0	1.5	0.0
NC-Goldsboro MSA	37	5,093	8.7	162	96.2	59.5	37.7	3.2	40.5	0.7	0.0
NC-Greensboro MSA	13	1,057	3.0	323	97.8	76.9	61.9	1.3	23.1	1.0	0.0
NC-Greenville MSA	1	60	0.2	109	95.8	100.0	33.9	2.8	0.0	1.5	0.0
NC-Hickory MSA	9	184	2.1	134	97.7	100.0	53.7	1.3	0.0	1.1	0.0
NC-Jacksonville MSA	1	230	0.2	48	96.7	100.0	43.8	1.8	0.0	1.6	0.0
NC-New Bern MSA	23	1,777	5.4	112	96.5	73.9	45.5	1.8	26.1	1.8	0.0
NC-Raleigh MSA	32	4,199	7.5	312	95.9	46.9	50.3	2.3	53.1	1.8	0.0
NC-Rocky Mount MSA	9	942	2.1	132	93.9	77.8	39.4	4.2	22.2	1.9	0.0
NC-Wilmington MSA	9	718	2.1	105	95.8	77.8	47.6	2.4	22.2	1.8	0.0
NC-Winston-Salem MSA	20	1,119	4.7	221	98.1	90.0	56.6	1.0	10.0	0.9	0.0
<b>Total</b>	<b>427</b>	<b>46,827</b>	<b>100.0</b>	<b>4,344</b>	<b>96.8</b>	<b>67.9</b>	<b>48.1</b>	<b>1.8</b>	<b>31.4</b>	<b>1.4</b>	<b>0.7</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Georgia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
GA Non-MSA	890	178,571	5.2	28,897	0.7	0.6	0.4	11.5	8.7	7.4	61.2	51.6	58.2	26.6	39.2	34.0	0.0	0.0	0.0
GA-Albany MSA	129	14,977	0.7	3,970	3.0	0.8	1.0	17.5	13.2	11.7	37.9	27.1	25.2	41.5	58.9	62.0	0.0	0.0	0.0
GA-Athens MSA	500	125,137	2.9	10,037	6.4	5.2	5.5	14.7	8.4	10.5	41.1	39.2	40.7	37.8	47.2	43.3	0.0	0.0	0.0
GA-Atlanta MSA	12,839	3,822,079	74.5	380,098	3.2	3.2	2.9	20.8	19.0	17.7	37.3	28.4	36.4	38.7	49.4	42.9	0.0	0.0	0.0
GA-Augusta MSA	677	144,665	3.9	21,203	6.0	1.9	2.2	23.9	11.5	11.5	34.6	26.1	34.1	35.5	60.4	52.2	0.0	0.0	0.0
GA-Brunswick MSA	157	47,511	0.9	5,954	1.3	0.0	0.5	19.6	7.0	9.3	42.2	26.1	33.4	36.8	66.9	56.8	0.0	0.0	0.0
GA-Dalton MSA	187	25,998	1.1	4,511	0.0	0.0	0.0	16.1	12.8	10.1	50.2	49.7	47.9	33.8	37.4	42.0	0.0	0.0	0.0
GA-Gainesville MSA	456	97,226	2.6	12,422	1.2	0.9	0.5	12.4	10.3	11.0	44.6	42.8	41.3	41.8	46.1	47.2	0.0	0.0	0.0
GA-Macon MSA	227	31,007	1.3	7,328	8.7	2.6	2.4	17.0	12.3	11.8	28.2	17.2	23.2	46.2	67.8	62.6	0.0	0.0	0.0
GA-Rome MSA	166	21,092	1.0	3,758	1.4	1.2	1.4	19.4	19.9	19.4	44.0	41.6	44.7	35.2	37.3	34.5	0.0	0.0	0.0
GA-Savannah MSA	711	172,598	4.1	24,135	4.0	2.3	1.8	16.9	11.4	11.4	41.2	38.7	38.1	37.9	47.7	48.7	0.0	0.0	0.0
GA-Valdosta MSA	56	9,059	0.3	6,301	4.5	0.0	2.1	14.8	21.4	12.0	46.9	39.3	36.9	33.7	39.3	49.0	0.0	0.0	0.0
GA-Warner Robins MSA	241	39,297	1.4	10,021	2.4	0.8	0.9	17.0	12.4	10.1	52.4	42.7	49.8	28.3	44.0	39.2	0.0	0.0	0.0
<b>Total</b>	<b>17,236</b>	<b>4,729,216</b>	<b>100.0</b>	<b>518,635</b>	<b>3.2</b>	<b>2.8</b>	<b>2.5</b>	<b>19.1</b>	<b>17.0</b>	<b>15.8</b>	<b>40.4</b>	<b>31.0</b>	<b>37.9</b>	<b>37.2</b>	<b>49.2</b>	<b>43.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



**Georgia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
GA Non-MSA	890	178,571	5.2	28,897	22.7	3.9	2.3	16.9	11.8	9.9	17.9	18.3	17.7	42.6	64.3	50.1
GA-Albany MSA	129	14,977	0.7	3,970	24.3	1.6	2.3	16.3	13.2	10.4	17.0	23.3	17.4	42.4	60.5	44.0
GA-Athens MSA	500	125,137	2.9	10,037	25.2	4.0	5.1	15.0	17.6	15.0	17.8	19.6	20.5	42.0	58.6	42.6
GA-Atlanta MSA	12,839	3,822,079	74.5	380,098	23.1	6.6	6.4	16.8	21.3	16.7	18.2	17.9	19.3	41.9	52.1	37.2
GA-Augusta MSA	677	144,665	3.9	21,203	25.3	5.0	3.7	15.3	15.4	12.6	17.7	21.1	18.7	41.7	53.2	34.9
GA-Brunswick MSA	157	47,511	0.9	5,954	22.5	3.8	4.7	16.0	15.3	13.2	19.6	19.1	18.0	41.8	59.2	44.8
GA-Dalton MSA	187	25,998	1.1	4,511	20.4	9.6	4.6	19.5	23.0	20.5	20.0	19.3	22.6	40.2	46.5	35.4
GA-Gainesville MSA	456	97,226	2.6	12,422	20.6	7.9	5.7	18.0	25.0	17.8	20.3	19.1	21.1	41.0	46.3	35.9
GA-Macon MSA	227	31,007	1.3	7,328	26.2	4.4	3.3	14.6	16.7	12.7	17.0	20.3	19.1	42.2	56.4	43.4
GA-Rome MSA	166	21,092	1.0	3,758	22.3	3.0	2.6	17.5	19.9	12.7	18.9	24.1	18.8	41.3	51.2	44.9
GA-Savannah MSA	711	172,598	4.1	24,135	22.9	8.2	4.5	16.3	22.5	16.3	20.5	21.9	20.8	40.3	45.0	31.8
GA-Valdosta MSA	56	9,059	0.3	6,301	24.1	5.4	3.2	16.6	21.4	10.8	17.1	26.8	20.4	42.2	42.9	36.5
GA-Warner Robins MSA	241	39,297	1.4	10,021	23.0	7.9	4.6	15.6	21.2	13.6	20.7	18.7	21.2	40.8	45.2	30.7
<b>Total</b>	<b>17,236</b>	<b>4,729,216</b>	<b>100.0</b>	<b>518,635</b>	<b>23.2</b>	<b>6.3</b>	<b>5.8</b>	<b>16.7</b>	<b>20.4</b>	<b>15.9</b>	<b>18.4</b>	<b>18.5</b>	<b>19.4</b>	<b>41.8</b>	<b>52.5</b>	<b>37.8</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Georgia: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
GA Non-MSA	1,032	31,204	5.9	15,397	2.1	1.6	2.0	15.7	15.2	15.8	59.0	56.0	58.4	23.3	27.2	23.8	0.0	0.0	0.0
GA-Albany MSA	226	4,392	1.3	3,095	10.3	9.7	9.7	25.7	20.4	23.9	27.7	33.6	29.8	36.4	36.3	36.6	0.0	0.0	0.0
GA-Athens MSA	321	14,625	1.8	5,033	10.6	11.2	9.3	10.2	13.1	12.3	34.8	36.8	35.7	43.4	38.6	42.4	1.0	0.3	0.3
GA-Atlanta MSA	13,118	664,635	74.6	250,432	6.2	4.8	5.5	23.8	21.7	22.9	31.2	30.1	31.7	38.5	43.1	39.7	0.4	0.4	0.3
GA-Augusta MSA	277	7,295	1.6	8,162	8.9	6.1	7.7	23.0	24.2	19.6	28.7	24.2	29.2	39.4	45.5	43.5	0.0	0.0	0.0
GA-Brunswick MSA	151	4,137	0.9	2,857	6.1	4.0	5.0	26.1	25.8	22.4	25.4	19.9	25.3	42.4	50.3	47.3	0.0	0.0	0.0
GA-Dalton MSA	263	24,657	1.5	2,069	0.0	0.0	0.0	16.5	16.7	15.3	52.3	50.2	54.8	31.2	33.1	29.9	0.0	0.0	0.0
GA-Gainesville MSA	577	22,639	3.3	5,466	8.8	9.0	7.9	16.5	16.8	17.0	41.5	40.6	42.1	33.2	33.6	33.1	0.0	0.0	0.0
GA-Macon MSA	416	18,349	2.4	5,497	13.9	12.0	11.8	17.6	15.9	17.8	25.3	28.6	27.1	43.3	43.5	43.2	0.0	0.0	0.0
GA-Rome MSA	102	2,021	0.6	1,863	3.3	2.0	3.4	42.1	36.3	39.6	31.9	37.3	33.6	22.6	24.5	23.5	0.0	0.0	0.0
GA-Savannah MSA	766	52,316	4.4	11,788	7.1	6.7	6.9	20.5	23.0	19.1	35.6	36.3	36.0	36.6	34.1	37.9	0.2	0.0	0.1
GA-Valdosta MSA	57	2,692	0.3	3,148	8.4	5.3	8.5	27.8	22.8	26.6	28.7	29.8	31.3	35.0	42.1	33.7	0.0	0.0	0.0
GA-Warner Robins MSA	276	16,697	1.6	3,488	4.9	1.8	3.6	18.5	18.8	18.5	54.8	55.4	53.9	21.8	23.9	24.0	0.0	0.0	0.0
<b>Total</b>	<b>17,582</b>	<b>865,659</b>	<b>100.0</b>	<b>318,295</b>	<b>6.3</b>	<b>5.0</b>	<b>5.6</b>	<b>22.8</b>	<b>21.0</b>	<b>22.0</b>	<b>33.2</b>	<b>32.9</b>	<b>33.6</b>	<b>37.3</b>	<b>40.8</b>	<b>38.6</b>	<b>0.3</b>	<b>0.3</b>	<b>0.2</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Georgia: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>										<b>2021</b>	
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Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
GA Non-MSA	1,032	31,204	5.9	15,397	87.6	83.8	43.7	3.1	14.1	9.3	2.0
GA-Albany MSA	226	4,392	1.3	3,095	86.7	82.7	43.1	3.2	14.2	10.2	3.1
GA-Athens MSA	321	14,625	1.8	5,033	88.9	73.8	49.3	2.6	18.1	8.5	8.1
GA-Atlanta MSA	13,118	664,635	74.6	250,432	93.0	76.6	42.1	2.1	20.5	4.9	3.0
GA-Augusta MSA	277	7,295	1.6	8,162	89.2	72.2	42.6	2.7	19.5	8.1	8.3
GA-Brunswick MSA	151	4,137	0.9	2,857	89.0	82.8	42.6	2.8	12.6	8.2	4.6
GA-Dalton MSA	263	24,657	1.5	2,069	83.8	68.8	47.7	5.2	28.5	11.0	2.7
GA-Gainesville MSA	577	22,639	3.3	5,466	89.8	78.5	45.3	3.7	17.9	6.5	3.6
GA-Macon MSA	416	18,349	2.4	5,497	88.3	80.3	38.6	3.1	18.5	8.6	1.2
GA-Rome MSA	102	2,021	0.6	1,863	87.2	82.4	41.3	3.4	11.8	9.4	5.9
GA-Savannah MSA	766	52,316	4.4	11,788	89.5	67.8	42.3	2.8	29.1	7.7	3.1
GA-Valdosta MSA	57	2,692	0.3	3,148	87.4	70.2	44.0	3.3	29.8	9.3	0.0
GA-Warner Robins MSA	276	16,697	1.6	3,488	90.0	72.5	41.4	2.0	24.3	8.0	3.3
<b>Total</b>	<b>17,582</b>	<b>865,659</b>	<b>100.0</b>	<b>318,295</b>	<b>92.0</b>	<b>76.6</b>	<b>42.3</b>	<b>2.3</b>	<b>20.3</b>	<b>5.7</b>	<b>3.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Georgia: Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																	<b>2021</b>		
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Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
GA Non-MSA	26	1,845	53.1	791	0.6	0.0	0.9	11.3	3.8	12.8	60.5	88.5	58.7	27.6	7.7	27.7	0.0	0.0	0.0
GA-Albany MSA	0	0	0.0	174	3.5	0.0	1.1	15.9	0.0	6.3	42.6	0.0	73.0	38.1	0.0	19.5	0.0	0.0	0.0
GA-Athens MSA	0	0	0.0	96	4.8	0.0	1.0	17.8	0.0	34.4	37.3	0.0	45.8	39.7	0.0	18.8	0.3	0.0	0.0
GA-Atlanta MSA	12	982	24.5	627	4.1	0.0	1.4	23.0	16.7	27.6	39.5	33.3	43.7	33.3	50.0	27.3	0.1	0.0	0.0
GA-Augusta MSA	1	75	2.0	75	6.0	0.0	0.0	28.2	0.0	41.3	33.0	0.0	38.7	32.8	100.0	20.0	0.0	0.0	0.0
GA-Brunswick MSA	1	107	2.0	24	2.8	0.0	0.0	18.5	100.0	8.3	36.8	0.0	54.2	41.9	0.0	37.5	0.0	0.0	0.0
GA-Dalton MSA	1	60	2.0	42	0.0	0.0	0.0	10.3	0.0	16.7	57.1	100.0	66.7	32.6	0.0	16.7	0.0	0.0	0.0
GA-Gainesville MSA	1	116	2.0	43	4.3	0.0	0.0	15.8	0.0	11.6	43.7	100.0	72.1	36.2	0.0	16.3	0.0	0.0	0.0
GA-Macon MSA	2	22	4.1	72	5.0	0.0	0.0	15.4	0.0	11.1	32.6	50.0	37.5	47.0	50.0	51.4	0.0	0.0	0.0
GA-Rome MSA	0	0	0.0	54	2.1	0.0	0.0	21.3	0.0	16.7	39.7	0.0	31.5	36.9	0.0	51.9	0.0	0.0	0.0
GA-Savannah MSA	2	84	4.1	61	3.7	0.0	0.0	17.1	0.0	9.8	44.0	100.0	47.5	35.2	0.0	42.6	0.0	0.0	0.0
GA-Valdosta MSA	0	0	0.0	108	3.1	0.0	0.0	13.9	0.0	10.2	54.1	0.0	66.7	28.9	0.0	23.1	0.0	0.0	0.0
GA-Warner Robins MSA	3	599	6.1	48	2.8	0.0	0.0	23.8	0.0	8.3	53.2	100.0	64.6	20.2	0.0	27.1	0.0	0.0	0.0
<b>Total</b>	<b>49</b>	<b>3,890</b>	<b>100.0</b>	<b>2,215</b>	<b>3.6</b>	<b>0.0</b>	<b>0.9</b>	<b>20.3</b>	<b>8.2</b>	<b>18.1</b>	<b>42.9</b>	<b>71.4</b>	<b>53.5</b>	<b>33.1</b>	<b>20.4</b>	<b>27.5</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Georgia: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
GA Non-MSA	26	1,845	53.1	791	97.1	92.3	52.5	1.7	7.7	1.2	0.0
GA-Albany MSA	--	--	--	174	96.3	--	50.0	1.9	--	1.8	--
GA-Athens MSA	--	--	--	96	97.8	--	63.5	1.3	--	1.0	--
GA-Atlanta MSA	12	982	24.5	627	97.3	75.0	55.0	1.4	25.0	1.3	0.0
GA-Augusta MSA	1	75	2.0	75	98.0	0.0	32.0	1.6	100.0	0.4	0.0
GA-Brunswick MSA	1	107	2.0	24	98.0	100.0	41.7	1.0	0.0	1.0	0.0
GA-Dalton MSA	1	60	2.0	42	95.5	0.0	42.9	2.4	100.0	2.1	0.0
GA-Gainesville MSA	1	116	2.0	43	97.5	0.0	67.4	1.7	100.0	0.8	0.0
GA-Macon MSA	2	22	4.1	72	97.4	100.0	38.9	0.7	0.0	1.9	0.0
GA-Rome MSA	--	--	--	54	97.5	--	24.1	1.4	--	1.1	--
GA-Savannah MSA	2	84	4.1	61	97.7	50.0	60.7	1.4	50.0	0.8	0.0
GA-Valdosta MSA	--	--	--	108	95.9	--	51.9	2.8	--	1.3	--
GA-Warner Robins MSA	3	599	6.1	48	97.7	33.3	41.7	1.7	66.7	0.5	0.0
<b>Total</b>	<b>49</b>	<b>3,890</b>	<b>100.0</b>	<b>2,215</b>	<b>97.3</b>	<b>77.6</b>	<b>51.6</b>	<b>1.5</b>	<b>22.4</b>	<b>1.2</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Virginia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
VA Non-MSA	1,483	239,083	11.8	33,813	0.2	0.0	0.1	16.2	10.2	8.9	64.9	63.2	54.4	18.7	26.6	36.6	0.0	0.0	0.0
VA-Blacksburg MSA	267	41,919	2.1	6,188	0.0	0.0	0.0	1.1	4.9	2.9	76.7	71.5	67.3	21.6	23.2	29.0	0.6	0.4	0.8
VA-Charlottesville MSA	673	184,094	5.4	13,263	2.7	3.1	3.0	16.9	12.9	12.6	54.5	50.8	54.6	26.0	33.1	29.7	0.0	0.0	0.0
VA-Harrisonburg MSA	379	74,331	3.0	5,632	0.4	0.0	1.2	10.0	11.3	11.7	76.9	69.4	69.3	12.7	19.3	17.8	0.0	0.0	0.0
VA-Lynchburg MSA	637	110,899	5.1	12,709	1.5	0.6	1.1	12.2	12.1	14.3	65.1	60.0	58.5	21.2	27.3	26.1	0.0	0.0	0.0
VA-Richmond MSA	4,295	1,013,036	34.2	93,138	4.5	3.7	3.8	17.9	15.9	15.0	41.6	34.8	39.1	35.9	45.5	42.0	0.2	0.0	0.1
VA-Roanoke MSA	806	126,846	6.4	15,807	1.4	1.0	1.2	18.4	13.6	13.7	47.5	45.4	47.3	32.7	40.0	37.8	0.0	0.0	0.0
VA-Staunton MSA	255	47,278	2.0	7,070	0.2	0.4	0.4	9.2	12.5	11.0	83.1	80.0	80.4	7.4	7.1	8.2	0.0	0.0	0.0
VA-Virginia Beach MSA	3,437	1,013,812	27.4	123,114	2.5	1.5	2.3	18.1	17.3	17.9	38.7	34.4	37.3	40.5	46.5	42.2	0.2	0.2	0.2
VA-Winchester MSA	319	69,740	2.5	8,571	0.0	0.0	0.0	10.7	8.8	8.5	57.9	64.6	61.9	31.5	26.6	29.6	0.0	0.0	0.0
<b>Total</b>	<b>12,551</b>	<b>2,921,037</b>	<b>100.0</b>	<b>319,305</b>	<b>2.2</b>	<b>2.0</b>	<b>2.3</b>	<b>16.3</b>	<b>14.5</b>	<b>14.7</b>	<b>50.8</b>	<b>44.4</b>	<b>44.4</b>	<b>30.7</b>	<b>39.1</b>	<b>38.4</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Virginia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
VA Non-MSA	1,483	239,083	11.8	33,813	21.4	7.3	4.1	17.9	19.3	13.3	20.1	21.9	18.6	40.5	49.6	42.8	0.0	1.9	21.2
VA-Blacksburg MSA	267	41,919	2.1	6,188	18.4	13.5	6.6	18.1	22.8	17.8	21.7	24.3	19.7	41.9	38.6	37.2	0.0	0.7	18.6
VA-Charlottesville MSA	673	184,094	5.4	13,263	19.8	8.9	6.5	16.8	20.1	16.8	21.0	22.9	19.5	42.4	46.8	39.4	0.0	1.3	17.7
VA-Harrisonburg MSA	379	74,331	3.0	5,632	18.6	7.1	5.1	19.5	25.1	17.3	22.7	22.2	20.9	39.3	43.8	37.9	0.0	1.8	18.8
VA-Lynchburg MSA	637	110,899	5.1	12,709	20.8	11.0	8.4	17.5	25.4	20.6	21.6	23.5	21.0	40.0	38.8	31.7	0.0	1.3	18.2
VA-Richmond MSA	4,295	1,013,036	34.2	93,138	21.0	10.1	7.2	18.0	27.5	19.5	20.1	20.4	20.5	40.9	39.5	32.9	0.0	2.5	19.8
VA-Roanoke MSA	806	126,846	6.4	15,807	19.9	11.5	8.7	17.5	25.1	20.9	22.4	24.4	19.8	40.2	37.0	32.0	0.0	2.0	18.7
VA-Staunton MSA	255	47,278	2.0	7,070	19.7	7.1	6.8	18.4	27.5	21.7	22.7	29.4	24.4	39.2	33.3	28.2	0.0	2.7	18.9
VA-Virginia Beach MSA	3,437	1,013,812	27.4	123,114	21.4	8.0	4.5	17.6	25.3	16.3	20.2	20.9	18.9	40.9	41.3	27.8	0.0	4.5	32.6
VA-Winchester MSA	319	69,740	2.5	8,571	19.7	9.4	5.3	16.3	30.4	17.5	19.5	21.9	19.7	44.5	36.1	34.3	0.0	2.2	23.1
<b>Total</b>	<b>12,551</b>	<b>2,921,037</b>	<b>100.0</b>	<b>319,305</b>	<b>20.9</b>	<b>9.2</b>	<b>5.8</b>	<b>17.7</b>	<b>25.2</b>	<b>17.5</b>	<b>20.6</b>	<b>21.6</b>	<b>19.7</b>	<b>40.8</b>	<b>41.3</b>	<b>32.3</b>	<b>0.0</b>	<b>2.8</b>	<b>24.7</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Virginia: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
VA Non-MSA	1,714	68,539	14.6	13,619	0.2	0.1	0.2	13.4	12.3	13.2	64.1	64.5	63.8	22.2	23.0	22.6	0.2	0.1	0.1
VA-Blacksburg MSA	124	8,284	1.1	2,134	0.0	0.0	0.0	1.8	0.0	1.3	69.9	83.1	72.4	26.6	15.3	24.9	1.8	1.6	1.5
VA-Charlottesville MSA	851	34,298	7.2	5,702	3.8	2.4	4.5	17.4	20.4	17.3	42.6	44.4	43.7	36.2	32.7	34.5	0.1	0.1	0.0
VA-Harrisonburg MSA	304	12,779	2.6	2,268	1.9	1.6	1.5	19.8	18.1	18.4	62.8	69.4	65.3	15.6	10.9	14.8	0.0	0.0	0.0
VA-Lynchburg MSA	694	30,641	5.9	4,860	1.2	1.4	1.2	19.3	18.0	18.2	55.6	55.0	55.4	23.9	25.5	25.2	0.0	0.0	0.0
VA-Richmond MSA	3,271	172,703	27.8	33,879	6.7	4.9	5.3	22.2	21.5	19.8	34.2	36.7	35.4	36.5	36.2	39.2	0.5	0.7	0.3
VA-Roanoke MSA	827	34,704	7.0	6,673	2.8	2.3	3.4	15.0	17.2	14.9	49.7	48.0	49.1	32.6	32.5	32.6	0.0	0.0	0.0
VA-Staunton MSA	223	10,294	1.9	2,221	4.1	3.1	3.6	5.8	7.2	6.5	82.0	80.7	83.3	8.0	9.0	6.6	0.0	0.0	0.0
VA-Virginia Beach MSA	3,433	192,907	29.2	35,306	4.4	2.5	3.8	23.3	21.2	21.5	35.8	36.6	35.8	35.4	38.7	37.5	1.1	1.0	1.4
VA-Winchester MSA	316	16,494	2.7	2,644	0.0	0.0	0.0	17.6	16.5	16.8	55.9	58.9	57.3	26.4	24.7	25.9	0.0	0.0	0.0
<b>Total</b>	<b>11,757</b>	<b>581,643</b>	<b>100.0</b>	<b>109,306</b>	<b>4.0</b>	<b>2.6</b>	<b>3.5</b>	<b>19.8</b>	<b>18.8</b>	<b>18.3</b>	<b>43.5</b>	<b>45.9</b>	<b>44.1</b>	<b>32.1</b>	<b>32.2</b>	<b>33.5</b>	<b>0.6</b>	<b>0.5</b>	<b>0.6</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Virginia: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
VA Non-MSA	1,714	68,539	14.6	13,619	85.2	74.3	52.9	3.5	18.5	11.3	7.2
VA-Blacksburg MSA	124	8,284	1.1	2,134	84.3	81.5	53.5	3.7	17.7	12.0	0.8
VA-Charlottesville MSA	851	34,298	7.2	5,702	88.3	73.2	53.7	3.4	19.4	8.3	7.4
VA-Harrisonburg MSA	304	12,779	2.6	2,268	87.0	77.6	54.0	3.5	16.4	9.5	5.9
VA-Lynchburg MSA	694	30,641	5.9	4,860	87.4	83.9	52.7	3.3	14.6	9.3	1.6
VA-Richmond MSA	3,271	172,703	27.8	33,879	89.0	70.8	49.4	3.1	23.9	7.9	5.3
VA-Roanoke MSA	827	34,704	7.0	6,673	86.2	71.6	49.7	3.7	21.9	10.0	6.5
VA-Staunton MSA	223	10,294	1.9	2,221	86.4	70.4	54.0	3.7	20.6	9.9	9.0
VA-Virginia Beach MSA	3,433	192,907	29.2	35,306	89.0	74.7	46.0	2.9	21.4	8.2	4.0
VA-Winchester MSA	316	16,494	2.7	2,644	87.0	73.7	49.1	3.5	20.3	9.4	6.0
<b>Total</b>	<b>11,757</b>	<b>581,643</b>	<b>100.0</b>	<b>109,306</b>	<b>88.0</b>	<b>73.8</b>	<b>49.4</b>	<b>3.2</b>	<b>20.9</b>	<b>8.8</b>	<b>5.2</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Virginia: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
VA Non-MSA	34	2,196	44.2	1,793	0.0	0.0	0.0	9.8	11.8	14.8	69.1	79.4	75.7	21.1	8.8	9.5	0.0	0.0	0.0
VA-Blacksburg MSA	1	25	1.3	173	0.0	0.0	0.0	0.4	0.0	0.0	72.3	100.0	86.7	26.2	0.0	13.3	1.1	0.0	0.0
VA-Charlottesville MSA	5	731	6.5	108	1.4	0.0	0.0	18.1	20.0	31.5	57.0	60.0	51.9	23.5	20.0	16.7	0.0	0.0	0.0
VA-Harrisonburg MSA	0	0	0.0	251	0.2	0.0	0.0	4.7	0.0	0.8	82.1	0.0	84.5	13.0	0.0	14.7	0.0	0.0	0.0
VA-Lynchburg MSA	8	217	10.4	349	0.7	0.0	0.0	8.7	0.0	2.3	69.9	100.0	92.0	20.8	0.0	5.7	0.0	0.0	0.0
VA-Richmond MSA	8	1,143	10.4	309	2.8	0.0	0.0	17.6	62.5	20.1	44.9	0.0	54.4	34.6	37.5	25.6	0.1	0.0	0.0
VA-Roanoke MSA	2	149	2.6	170	1.8	0.0	0.0	17.6	0.0	31.8	48.1	50.0	52.9	32.5	50.0	15.3	0.0	0.0	0.0
VA-Staunton MSA	4	984	5.2	266	0.6	0.0	0.0	4.4	0.0	12.4	90.4	75.0	85.3	4.7	25.0	2.3	0.0	0.0	0.0
VA-Virginia Beach MSA	13	982	16.9	289	2.2	0.0	0.3	17.2	30.8	15.6	38.1	23.1	48.8	42.1	46.2	35.3	0.4	0.0	0.0
VA-Winchester MSA	2	159	2.6	40	0.0	0.0	0.0	10.1	0.0	2.5	64.6	50.0	65.0	25.3	50.0	32.5	0.0	0.0	0.0
<b>Total</b>	<b>77</b>	<b>6,586</b>	<b>100.0</b>	<b>3,748</b>	<b>1.4</b>	<b>0.0</b>	<b>0.0</b>	<b>13.4</b>	<b>18.2</b>	<b>13.4</b>	<b>56.2</b>	<b>61.0</b>	<b>73.3</b>	<b>28.9</b>	<b>20.8</b>	<b>13.2</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Virginia: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
VA Non-MSA	34	2,196	44.2	1,793	98.3	88.2	44.6	0.9	11.8	0.8	0.0
VA-Blacksburg MSA	1	25	1.3	173	97.7	100.0	30.1	1.3	0.0	1.1	0.0
VA-Charlottesville MSA	5	731	6.5	108	98.1	60.0	53.7	1.2	40.0	0.7	0.0
VA-Harrisonburg MSA	--	--	--	251	98.3	--	41.0	0.8	--	0.9	--
VA-Lynchburg MSA	8	217	10.4	349	98.3	100.0	32.7	0.8	0.0	0.9	0.0
VA-Richmond MSA	8	1,143	10.4	309	97.3	75.0	45.6	1.5	25.0	1.3	0.0
VA-Roanoke MSA	2	149	2.6	170	97.3	100.0	31.8	1.9	0.0	0.8	0.0
VA-Staunton MSA	4	984	5.2	266	97.5	75.0	42.1	2.0	25.0	0.4	0.0
VA-Virginia Beach MSA	13	982	16.9	289	97.1	69.2	35.6	1.6	30.8	1.3	0.0
VA-Winchester MSA	2	159	2.6	40	97.3	50.0	37.5	2.2	50.0	0.4	0.0
<b>Total</b>	<b>77</b>	<b>6,586</b>	<b>100.0</b>	<b>3,748</b>	<b>97.6</b>	<b>81.8</b>	<b>41.4</b>	<b>1.3</b>	<b>18.2</b>	<b>1.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Maryland: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
MD Non-MSA	342	103,708	2.5	9,049	1.0	0.0	0.5	11.7	11.4	10.9	74.8	72.5	74.3	12.4	16.1	14.3	0.0	0.0	0.0
MD-Baltimore MSA	7,519	2,450,865	54.6	182,252	4.9	2.0	3.0	17.3	12.8	14.2	38.2	35.5	39.3	39.5	49.7	43.4	0.1	0.0	0.1
MD-California MSA	232	61,423	1.7	9,004	2.7	1.7	4.3	8.6	8.6	7.4	67.7	69.0	69.8	21.0	20.7	18.5	0.0	0.0	0.0
MD-Frederick MD	5,269	2,278,001	38.3	94,118	3.2	2.4	2.8	17.9	17.8	17.0	40.4	36.3	42.3	38.5	43.4	37.8	0.1	0.1	0.1
MD-Salisbury MSA	330	74,695	2.4	12,184	1.6	1.8	0.8	14.2	8.8	9.3	46.5	39.1	43.7	37.6	50.3	46.2	0.0	0.0	0.0
MD-Wilmington MD	83	19,376	0.6	6,471	2.3	0.0	1.8	3.3	2.4	4.0	75.7	66.3	75.7	18.8	31.3	18.6	0.0	0.0	0.0
<b>Total</b>	<b>13,775</b>	<b>4,988,068</b>	<b>100.0</b>	<b>313,078</b>	<b>4.1</b>	<b>2.1</b>	<b>2.8</b>	<b>16.6</b>	<b>14.4</b>	<b>14.4</b>	<b>42.1</b>	<b>37.6</b>	<b>43.0</b>	<b>37.2</b>	<b>45.9</b>	<b>39.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Maryland: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
MD Non-MSA	342	103,708	2.5	9,049	21.1	2.3	3.7	17.5	12.3	13.2	21.2	15.5	16.9	40.2	68.1	45.7	0.0	1.8	20.5
MD-Baltimore MSA	7,519	2,450,865	54.6	182,252	22.3	10.3	7.6	17.0	33.5	18.5	19.8	18.0	19.4	40.8	36.9	30.7	0.0	1.3	23.8
MD-California MSA	232	61,423	1.7	9,004	20.1	11.6	7.0	16.9	22.8	18.1	24.6	25.9	21.3	38.3	31.9	20.5	0.0	7.8	33.1
MD-Frederick MD	5,269	2,278,001	38.3	94,118	21.7	10.0	8.8	17.1	27.4	18.8	20.8	20.3	21.4	40.5	41.6	32.1	0.0	0.6	18.9
MD-Salisbury MSA	330	74,695	2.4	12,184	22.1	4.5	4.7	17.3	20.6	13.0	20.1	19.1	17.4	40.5	53.9	47.8	0.0	1.8	17.1
MD-Wilmington MD	83	19,376	0.6	6,471	20.9	9.6	6.2	18.1	28.9	19.0	22.4	24.1	21.8	38.5	34.9	27.4	0.0	2.4	25.6
<b>Total</b>	<b>13,775</b>	<b>4,988,068</b>	<b>100.0</b>	<b>313,078</b>	<b>22.0</b>	<b>9.9</b>	<b>7.7</b>	<b>17.1</b>	<b>30.1</b>	<b>18.2</b>	<b>20.3</b>	<b>19.0</b>	<b>19.9</b>	<b>40.6</b>	<b>39.8</b>	<b>31.8</b>	<b>0.0</b>	<b>1.1</b>	<b>22.3</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Maryland: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
MD Non-MSA	208	9,796	3.1	4,436	1.3	2.9	0.9	17.4	11.5	13.8	66.3	75.0	70.3	15.0	10.6	15.0	0.0	0.0	0.0	
MD-Baltimore MSA	3,549	262,079	52.2	81,736	6.2	3.3	4.7	17.7	15.9	15.2	37.3	38.4	38.5	38.3	41.9	41.1	0.6	0.5	0.5	
MD-California MSA	79	4,960	1.2	2,005	5.8	7.6	3.9	10.1	3.8	8.4	63.4	73.4	66.8	20.7	15.2	20.9	0.0	0.0	0.0	
MD-Frederick MD	2,773	147,463	40.8	44,366	4.9	4.1	4.5	21.2	22.3	21.4	36.3	38.7	37.4	37.5	34.7	36.6	0.1	0.1	0.1	
MD-Salisbury MSA	150	12,030	2.2	4,929	1.1	4.0	1.2	15.4	12.0	13.4	50.7	44.0	50.2	32.8	40.0	35.1	0.1	0.0	0.2	
MD-Wilmington MD	45	1,372	0.7	1,620	9.4	0.0	7.2	4.7	0.0	4.4	71.6	84.4	73.1	14.3	15.6	15.2	0.0	0.0	0.0	
<b>Total</b>	<b>6,804</b>	<b>437,700</b>	<b>100.0</b>	<b>139,092</b>	<b>5.5</b>	<b>3.7</b>	<b>4.4</b>	<b>18.4</b>	<b>18.0</b>	<b>16.8</b>	<b>39.2</b>	<b>40.5</b>	<b>40.4</b>	<b>36.5</b>	<b>37.5</b>	<b>38.0</b>	<b>0.4</b>	<b>0.3</b>	<b>0.3</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Maryland: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MD Non-MSA	208	9,796	3.1	4,436	85.9	81.3	49.5	4.2	17.3	9.9	1.4
MD-Baltimore MSA	3,549	262,079	52.2	81,736	89.1	74.2	46.3	3.5	24.0	7.4	1.8
MD-California MSA	79	4,960	1.2	2,005	86.5	74.7	48.8	3.2	21.5	10.3	3.8
MD-Frederick MD	2,773	147,463	40.8	44,366	90.2	73.7	48.8	3.5	22.4	6.3	3.9
MD-Salisbury MSA	150	12,030	2.2	4,929	86.3	68.7	42.0	3.6	26.7	10.1	4.7
MD-Wilmington MD	45	1,372	0.7	1,620	88.1	80.0	46.6	2.8	20.0	9.1	0.0
<b>Total</b>	<b>6,804</b>	<b>437,700</b>	<b>100.0</b>	<b>139,092</b>	<b>89.2</b>	<b>74.1</b>	<b>47.1</b>	<b>3.5</b>	<b>23.1</b>	<b>7.3</b>	<b>2.7</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Maryland: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MD Non-MSA	7	187	18.4	208	0.2	0.0	0.0	9.5	0.0	4.8	79.6	100.0	89.9	10.7	0.0	5.3	0.0	0.0	0.0
MD-Baltimore MSA	10	391	26.3	396	1.9	0.0	1.0	12.3	0.0	4.5	39.7	30.0	51.0	46.0	70.0	43.4	0.1	0.0	0.0
MD-California MSA	0	0	0.0	92	2.6	0.0	0.0	9.9	0.0	7.6	69.1	0.0	87.0	18.4	0.0	5.4	0.0	0.0	0.0
MD-Frederick MD	6	1,104	15.8	178	4.2	0.0	0.0	23.0	50.0	27.0	43.3	33.3	53.4	29.5	16.7	19.7	0.0	0.0	0.0
MD-Salisbury MSA	2	236	5.3	114	0.6	0.0	0.0	15.8	0.0	7.0	47.0	50.0	61.4	36.2	50.0	31.6	0.4	0.0	0.0
MD-Wilmington MD	13	2,543	34.2	69	1.5	0.0	1.4	2.5	0.0	0.0	73.7	84.6	65.2	22.4	15.4	33.3	0.0	0.0	0.0
<b>Total</b>	<b>38</b>	<b>4,461</b>	<b>100.0</b>	<b>1,057</b>	<b>2.3</b>	<b>0.0</b>	<b>0.5</b>	<b>14.7</b>	<b>7.9</b>	<b>8.6</b>	<b>46.9</b>	<b>63.2</b>	<b>64.2</b>	<b>36.1</b>	<b>28.9</b>	<b>26.7</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Maryland: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
MD Non-MSA	7	187	18.4	208	97.6	85.7	40.9	1.4	14.3	1.0	0.0	
MD-Baltimore MSA	10	391	26.3	396	95.9	80.0	52.5	2.4	20.0	1.7	0.0	
MD-California MSA	--		--	92	97.7	--	58.7	1.0	--	1.3	--	
MD-Frederick MD	6	1,104	15.8	178	95.0	83.3	38.2	3.0	16.7	2.0	0.0	
MD-Salisbury MSA	2	236	5.3	114	96.8	50.0	57.9	1.6	50.0	1.6	0.0	
MD-Wilmington MD	13	2,543	34.2	69	94.1	92.3	68.1	3.7	7.7	2.2	0.0	
<b>Total</b>	<b>38</b>	<b>4,461</b>	<b>100.0</b>	<b>1,057</b>	<b>95.9</b>	<b>84.2</b>	<b>50.0</b>	<b>2.4</b>	<b>15.8</b>	<b>1.7</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Texas: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
TX-Austin MSA	1,759	787,090	17.1	158,679	3.8	5.2	3.5	18.1	18.3	13.9	40.3	32.0	43.3	37.6	44.4	39.1	0.2	0.2	0.2
TX-College Station MSA	180	52,180	1.8	10,037	2.4	2.8	3.9	21.4	15.6	20.3	36.8	22.8	30.6	39.3	58.9	45.1	0.0	0.0	0.0
TX-Dallas MD	3,538	1,461,634	34.4	271,037	5.4	3.0	3.0	20.4	10.4	11.0	28.9	21.8	31.4	45.2	64.6	54.4	0.1	0.1	0.2
TX-Fort Worth MD	1,351	541,244	13.1	122,717	4.4	1.3	2.1	17.2	11.8	12.2	38.9	26.3	38.4	39.5	60.6	47.3	0.0	0.0	0.0
TX-Houston MSA	2,592	991,965	25.2	308,435	5.2	4.4	2.6	21.3	14.7	12.6	29.4	15.7	26.6	44.1	65.1	58.1	0.1	0.1	0.1
TX-Midland MSA	129	43,902	1.3	8,888	2.7	0.8	1.2	12.9	4.7	6.8	43.7	26.4	38.0	40.6	68.2	54.1	0.0	0.0	0.0
TX-Odessa MSA	21	3,430	0.2	5,705	1.6	0.0	1.0	21.4	9.5	7.4	42.7	33.3	22.4	34.3	57.1	69.2	0.0	0.0	0.0
TX-San Antonio MSA	706	239,035	6.9	130,196	4.1	1.7	1.4	22.3	12.3	11.4	31.9	22.1	31.9	41.6	63.9	55.4	0.0	0.0	0.0
<b>Total</b>	<b>10,276</b>	<b>4,120,481</b>	<b>100.0</b>	<b>1,015,694</b>	<b>4.8</b>	<b>3.4</b>	<b>2.6</b>	<b>20.2</b>	<b>13.2</b>	<b>12.2</b>	<b>32.4</b>	<b>22.7</b>	<b>32.7</b>	<b>42.6</b>	<b>60.6</b>	<b>52.4</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Texas: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
TX-Austin MSA	1,759	787,090	17.1	158,679	22.5	2.1	3.3	16.9	16.8	12.8	19.8	21.4	18.4	40.8	59.1	45.0	0.0	0.6	20.5
TX-College Station MSA	180	52,180	1.8	10,037	24.3	3.3	2.5	16.3	11.7	12.3	17.7	22.8	17.8	41.8	61.1	46.1	0.0	1.1	21.3
TX-Dallas MD	3,538	1,461,634	34.4	271,037	23.7	2.5	3.4	16.5	14.3	12.8	17.6	17.5	18.1	42.2	64.6	44.1	0.0	1.1	21.6
TX-Fort Worth MD	1,351	541,244	13.1	122,717	22.6	1.6	3.2	16.7	14.2	13.0	19.5	17.0	20.0	41.3	65.8	39.4	0.0	1.3	24.4
TX-Houston MSA	2,592	991,965	25.2	308,435	24.4	1.5	2.6	16.1	14.5	12.0	17.1	15.4	18.7	42.4	67.2	44.2	0.0	1.4	22.5
TX-Midland MSA	129	43,902	1.3	8,888	21.9	3.1	4.5	17.5	18.6	16.7	20.2	20.2	19.5	40.4	58.1	31.9	0.0	0.0	27.4
TX-Odessa MSA	21	3,430	0.2	5,705	21.8	4.8	5.1	17.3	23.8	19.3	20.5	28.6	21.8	40.4	33.3	21.0	0.0	9.5	32.7
TX-San Antonio MSA	706	239,035	6.9	130,196	22.3	2.3	2.6	17.3	19.0	11.6	19.2	14.6	18.5	41.2	61.9	36.0	0.0	2.3	31.4
<b>Total</b>	<b>10,276</b>	<b>4,120,481</b>	<b>100.0</b>	<b>1,015,694</b>	<b>23.5</b>	<b>2.1</b>	<b>3.0</b>	<b>16.5</b>	<b>15.1</b>	<b>12.5</b>	<b>18.1</b>	<b>17.5</b>	<b>18.6</b>	<b>41.9</b>	<b>64.1</b>	<b>42.4</b>	<b>0.0</b>	<b>1.2</b>	<b>23.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Texas: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
TX-Austin MSA	685	41,427	10.8	73,528	6.2	7.2	6.7	13.0	15.9	14.4	34.0	39.3	35.3	45.6	37.1	42.7	1.2	0.6	0.8
TX-College Station MSA	251	16,935	4.0	5,864	6.8	1.6	4.4	22.2	32.3	23.5	33.0	35.5	32.0	37.7	30.7	40.0	0.3	0.0	0.1
TX-Dallas MD	2,238	124,824	35.4	170,269	7.2	7.7	7.2	17.3	20.3	18.1	26.7	28.6	25.9	47.9	42.3	48.0	0.9	1.2	0.8
TX-Fort Worth MD	926	56,301	14.6	68,838	5.8	5.4	6.0	19.2	26.8	19.3	30.8	29.5	31.1	44.1	38.3	43.5	0.1	0.0	0.0
TX-Houston MSA	1,488	79,698	23.5	236,116	9.1	8.5	9.4	17.8	22.5	18.6	23.1	29.5	24.3	49.7	39.5	47.5	0.2	0.0	0.1
TX-Midland MSA	70	3,804	1.1	6,455	1.4	2.9	2.2	21.8	20.0	17.2	36.4	42.9	38.6	39.8	34.3	41.5	0.6	0.0	0.4
TX-Odessa MSA	74	2,776	1.2	4,615	1.4	0.0	1.3	21.1	23.0	21.2	32.9	40.5	36.4	44.5	36.5	41.2	0.0	0.0	0.0
TX-San Antonio MSA	592	29,745	9.4	55,074	4.0	3.9	3.7	19.0	20.6	18.7	30.6	30.1	29.4	46.2	45.1	48.0	0.2	0.3	0.2
<b>Total</b>	<b>6,324</b>	<b>355,510</b>	<b>100.0</b>	<b>620,759</b>	<b>7.2</b>	<b>6.7</b>	<b>7.4</b>	<b>17.4</b>	<b>21.8</b>	<b>18.1</b>	<b>27.5</b>	<b>30.8</b>	<b>27.6</b>	<b>47.4</b>	<b>40.1</b>	<b>46.5</b>	<b>0.5</b>	<b>0.5</b>	<b>0.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Texas: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
TX-Austin MSA	685	41,427	10.8	73,528	89.4	77.8	45.2	3.0	20.7	7.6	1.5
TX-College Station MSA	251	16,935	4.0	5,864	83.4	71.7	46.1	3.8	23.9	12.8	4.4
TX-Dallas MD	2,238	124,824	35.4	170,269	88.6	74.0	43.1	3.6	22.5	7.8	3.6
TX-Fort Worth MD	926	56,301	14.6	68,838	88.0	76.0	43.0	3.4	22.0	8.6	1.9
TX-Houston MSA	1,488	79,698	23.5	236,116	88.2	79.0	42.2	4.0	19.3	7.7	1.7
TX-Midland MSA	70	3,804	1.1	6,455	84.6	74.3	38.0	5.0	25.7	10.4	0.0
TX-Odessa MSA	74	2,776	1.2	4,615	82.6	81.1	33.4	5.4	13.5	12.0	5.4
TX-San Antonio MSA	592	29,745	9.4	55,074	87.4	77.5	43.8	3.4	18.6	9.2	3.9
<b>Total</b>	<b>6,324</b>	<b>355,510</b>	<b>100.0</b>	<b>620,759</b>	<b>88.3</b>	<b>76.2</b>	<b>43.0</b>	<b>3.7</b>	<b>21.1</b>	<b>8.1</b>	<b>2.7</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Texas: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
TX-Austin MSA	0	0	0.0	434	4.5	0.0	1.6	16.3	0.0	23.0	39.4	0.0	47.9	39.4	0.0	27.4	0.4	0.0	0.0
TX-College Station MSA	1	10	11.1	217	3.7	0.0	4.6	13.6	0.0	6.5	43.3	100.0	56.7	39.5	0.0	32.3	0.0	0.0	0.0
TX-Dallas MD	5	235	55.6	901	5.0	20.0	1.4	16.5	20.0	16.9	31.9	20.0	39.6	46.1	40.0	41.6	0.6	0.0	0.4
TX-Fort Worth MD	1	108	11.1	563	3.0	0.0	0.5	14.4	0.0	8.0	37.9	0.0	52.2	44.8	100.0	39.3	0.0	0.0	0.0
TX-Houston MSA	1	28	11.1	1,094	5.1	0.0	2.5	16.2	0.0	18.3	30.4	100.0	38.0	48.2	0.0	41.1	0.1	0.0	0.1
TX-Midland MSA	0	0	0.0	90	0.4	0.0	1.1	15.4	0.0	5.6	40.3	0.0	63.3	43.6	0.0	30.0	0.4	0.0	0.0
TX-Odessa MSA	1	4	11.1	12	1.1	0.0	0.0	13.2	100.0	8.3	27.0	0.0	33.3	58.6	0.0	58.3	0.0	0.0	0.0
TX-San Antonio MSA	0	0	0.0	496	1.8	0.0	0.4	12.8	0.0	10.1	35.2	0.0	41.1	50.3	0.0	48.4	0.0	0.0	0.0
<b>Total</b>	<b>9</b>	<b>385</b>	<b>100.0</b>	<b>3,807</b>	<b>4.1</b>	<b>11.1</b>	<b>1.7</b>	<b>15.5</b>	<b>22.2</b>	<b>14.9</b>	<b>34.1</b>	<b>33.3</b>	<b>43.7</b>	<b>46.0</b>	<b>33.3</b>	<b>39.6</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Texas: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
TX-Austin MSA	--		--	434	97.1	--	55.1	1.6	--	1.3	--
TX-College Station MSA	1	10	11.1	217	96.6	100.0	59.4	1.0	0.0	2.4	0.0
TX-Dallas MD	5	235	55.6	901	96.1	60.0	58.4	2.0	20.0	1.9	20.0
TX-Fort Worth MD	1 <sup>--</sup>	108	11.1	563	96.7	0.0	51.5	1.8	100.0	1.5	0.0
TX-Houston MSA	1	28	11.1	1,094	95.8	100.0	56.1	2.2	0.0	2.1	0.0
TX-Midland MSA	--		--	90	98.9	--	45.6	0.9	--	0.2	--
TX-Odessa MSA	1	4	11.1	12	96.6	100.0	75.0	0.6	0.0	2.9	0.0
TX-San Antonio MSA	--		--	496	96.6	--	55.4	1.6	--	1.7	--
<b>Total</b>	<b>9<sup>--</sup></b>	<b>385</b>	<b>100.0</b>	<b>3,807</b>	<b>96.4</b>	<b>66.7</b>	<b>55.8</b>	<b>1.9</b>	<b>22.2</b>	<b>1.8</b>	<b>11.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

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Pennsylvania: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
PA Non-MSA	257	26,819	3.9	9,260	0.0	0.0	0.0	8.9	4.7	5.3	77.0	87.2	77.0	14.1	8.2	17.7	0.0	0.0	0.0
PA-Allentown MSA	796	151,212	12.0	36,102	3.5	1.5	3.7	14.9	12.3	15.9	46.5	43.6	43.4	35.1	42.6	37.0	0.0	0.0	0.0
PA-Chambersburg MSA	168	25,773	2.5	8,276	1.4	3.6	2.8	6.5	10.1	8.1	82.7	72.6	76.9	9.4	13.7	12.2	0.0	0.0	0.0
PA-East Stroudsburg MSA	80	16,170	1.2	9,618	0.0	0.0	0.0	8.0	17.5	10.7	86.4	73.8	85.0	5.6	8.8	4.3	0.0	0.0	0.0
PA-Gettysburg MSA	154	31,998	2.3	5,493	0.0	0.0	0.0	2.2	2.6	2.3	83.9	84.4	80.9	13.9	13.0	16.7	0.0	0.0	0.0
PA-Harrisburg MSA	383	75,097	5.8	29,759	2.7	0.8	2.6	12.2	9.9	10.8	58.5	57.4	54.3	26.6	31.9	32.3	0.0	0.0	0.0
PA-Lancaster MSA	652	107,034	9.8	24,681	1.6	2.3	2.2	8.8	8.7	10.3	76.1	75.2	72.6	13.5	13.8	14.9	0.0	0.0	0.0
PA-Lebanon MSA	84	14,420	1.3	6,508	1.3	0.0	1.6	12.1	13.1	12.9	67.8	67.9	64.5	18.8	19.0	21.0	0.0	0.0	0.0
PA-Montgomery County MD	2,134	829,729	32.1	126,316	1.6	1.2	1.5	16.4	13.8	15.5	49.9	49.2	49.3	32.2	35.8	33.7	0.0	0.0	0.0
PA-Philadelphia MD	645	225,052	9.7	84,673	7.0	2.2	4.2	24.3	19.8	20.2	23.5	14.6	22.5	45.1	63.4	53.0	0.0	0.0	0.0
PA-Reading MSA	388	60,158	5.8	18,528	7.1	2.3	5.1	4.1	1.8	3.5	61.1	59.3	60.5	27.7	36.6	30.8	0.0	0.0	0.0
PA-Scranton MSA	143	20,155	2.2	19,384	1.6	1.4	1.5	14.2	20.3	13.6	56.5	48.3	51.8	27.6	30.1	33.0	0.0	0.0	0.1
PA-State College MSA	55	14,101	0.8	5,658	0.0	0.0	0.0	16.0	12.7	15.7	51.7	43.6	46.1	31.5	38.2	36.9	0.8	5.5	1.4
PA-Williamsport MSA	70	7,530	1.1	4,391	1.4	2.9	1.5	7.2	11.4	8.0	84.3	80.0	82.9	7.0	5.7	7.5	0.0	0.0	0.0
PA-York MSA	631	121,165	9.5	25,498	3.3	2.2	3.1	6.2	4.4	5.4	70.9	70.7	69.2	19.6	22.7	22.3	0.0	0.0	0.0



Pennsylvania: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
<b>Total</b>	<b>6,640</b>	<b>1,726,413</b>	<b>100.0</b>	<b>414,145</b>	<b>3.2</b>	<b>1.6</b>	<b>2.6</b>	<b>14.6</b>	<b>11.3</b>	<b>13.8</b>	<b>52.6</b>	<b>54.5</b>	<b>49.9</b>	<b>29.6</b>	<b>32.6</b>	<b>33.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

**Pennsylvania: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA Non-MSA	257	26,819	3.9	9,260	19.0	14.0	6.5	18.9	22.6	18.7	21.6	21.8	22.8	40.5	39.3	35.3
PA-Allentown MSA	796	151,212	12.0	36,102	21.3	11.6	7.9	18.5	23.1	18.7	21.4	20.0	21.9	38.8	42.5	34.8
PA-Chambersburg MSA	168	25,773	2.5	8,276	18.6	8.9	6.4	19.9	29.8	18.4	22.3	31.0	20.6	39.2	29.2	30.1
PA-East Stroudsburg MSA	80	16,170	1.2	9,618	20.7	5.0	5.1	18.1	38.8	17.8	21.3	21.3	22.1	39.9	32.5	35.0
PA-Gettysburg MSA	154	31,998	2.3	5,493	17.9	5.8	5.9	18.6	21.4	18.7	24.3	30.5	24.0	39.3	42.2	33.2
PA-Harrisburg MSA	383	75,097	5.8	29,759	19.7	11.2	8.7	18.3	27.4	19.5	22.0	24.0	21.6	40.0	35.0	32.8
PA-Lancaster MSA	652	107,034	9.8	24,681	18.3	10.3	7.0	19.2	23.8	21.2	23.1	25.3	24.0	39.4	37.7	33.7
PA-Lebanon MSA	84	14,420	1.3	6,508	18.0	4.8	7.6	19.0	29.8	19.4	24.8	21.4	23.1	38.1	41.7	32.0
PA-Montgomery County MD	2,134	829,729	32.1	126,316	20.0	9.8	8.8	18.3	26.0	20.0	22.0	23.7	23.1	39.7	39.2	34.4
PA-Philadelphia MD	645	225,052	9.7	84,673	25.2	2.8	4.2	15.9	10.1	12.2	16.3	15.8	18.6	42.7	69.3	46.3
PA-Reading MSA	388	60,158	5.8	18,528	21.4	7.7	9.2	17.2	22.2	20.3	21.4	27.3	22.5	40.1	39.9	31.3
PA-Scranton MSA	143	20,155	2.2	19,384	21.3	12.6	8.2	17.6	24.5	18.0	20.5	25.9	20.5	40.6	31.5	34.4
PA-State College MSA	55	14,101	0.8	5,658	19.6	5.5	7.1	18.5	12.7	17.2	21.5	25.5	23.8	40.3	54.5	40.2
PA-Williamsport MSA	70	7,530	1.1	4,391	20.0	14.3	7.9	18.7	22.9	19.0	22.1	31.4	23.6	39.2	30.0	32.8
PA-York MSA	631	121,165	9.5	25,498	19.5	10.1	7.0	18.4	29.2	19.3	22.3	24.7	22.7	39.9	33.4	32.1
<b>Total</b>	<b>6,640</b>	<b>1,726,413</b>	<b>100.0</b>	<b>414,145</b>	<b>21.1</b>	<b>9.4</b>	<b>7.3</b>	<b>17.8</b>	<b>23.9</b>	<b>18.0</b>	<b>20.7</b>	<b>23.3</b>	<b>21.8</b>	<b>40.3</b>	<b>41.3</b>	<b>36.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Pennsylvania: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
PA Non-MSA	269	16,553	4.3	5,323	0.0	0.0	0.0	11.0	7.4	8.5	74.0	82.9	73.7	14.9	9.7	17.8	0.1	0.0	0.0
PA-Allentown MSA	794	63,221	12.8	18,127	8.0	5.3	5.9	17.3	16.0	17.4	40.1	48.6	41.0	34.7	30.1	35.7	0.0	0.0	0.0
PA-Chambersburg MSA	152	7,183	2.4	3,034	4.9	2.6	3.3	8.1	6.6	5.4	79.2	78.9	82.4	7.8	11.8	8.8	0.0	0.0	0.0
PA-East Stroudsburg MSA	55	1,853	0.9	4,358	0.0	0.0	0.0	18.2	10.9	14.6	76.5	85.5	79.2	5.3	3.6	6.2	0.0	0.0	0.0
PA-Gettysburg MSA	113	7,082	1.8	1,840	0.0	0.0	0.0	10.9	7.1	10.1	77.7	83.2	76.7	11.4	9.7	13.2	0.0	0.0	0.0
PA-Harrisburg MSA	302	16,387	4.9	11,247	5.8	4.0	4.6	18.9	12.6	15.8	52.6	59.3	55.5	22.7	24.2	24.1	0.0	0.0	0.0
PA-Lancaster MSA	803	86,145	12.9	13,518	4.1	1.7	3.6	11.0	8.0	9.9	72.4	79.7	73.7	12.4	10.6	12.8	0.0	0.0	0.0
PA-Lebanon MSA	85	5,278	1.4	2,517	1.4	0.0	1.5	18.0	11.8	16.0	61.6	65.9	66.9	19.0	22.4	15.7	0.0	0.0	0.0
PA-Montgomery MD	1,954	159,105	31.4	71,284	2.6	2.6	2.3	14.6	20.1	14.5	47.9	50.2	49.9	34.8	26.9	33.3	0.0	0.3	0.1
PA-Philadelphia MD	551	45,893	8.9	53,108	7.1	3.3	6.3	25.7	23.6	23.8	19.5	17.1	18.6	46.6	54.4	50.0	1.2	1.6	1.2
PA-Reading MSA	489	45,197	7.9	9,186	11.5	6.3	9.2	5.1	3.1	4.8	56.2	57.5	57.4	27.2	33.1	28.6	0.0	0.0	0.0
PA-Scranton MSA	165	6,992	2.7	11,665	2.8	6.1	2.3	19.4	20.6	17.1	51.2	42.4	52.6	24.6	30.9	26.5	2.1	0.0	1.5
PA-State College MSA	68	6,608	1.1	2,677	1.6	0.0	0.0	18.3	20.6	18.4	38.5	41.2	42.1	31.9	32.4	30.9	9.6	5.9	8.7
PA-Williamsport MSA	89	7,620	1.4	2,016	5.0	4.5	3.6	16.2	10.1	13.7	71.6	77.5	74.9	7.2	7.9	7.8	0.0	0.0	0.0
PA-York MSA	327	21,282	5.3	8,254	9.6	6.4	7.6	6.7	7.0	6.1	65.5	65.1	65.8	18.2	21.4	20.5	0.0	0.0	0.0
<b>Total</b>	<b>6,216</b>	<b>496,399</b>	<b>100.0</b>	<b>218,154</b>	<b>5.1</b>	<b>3.3</b>	<b>4.1</b>	<b>17.5</b>	<b>14.5</b>	<b>16.0</b>	<b>44.3</b>	<b>56.0</b>	<b>46.5</b>	<b>32.5</b>	<b>25.9</b>	<b>32.9</b>	<b>0.6</b>	<b>0.3</b>	<b>0.5</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Pennsylvania: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA Non-MSA	269	16,553	4.3	5,323	84.8	77.3	49.6	4.2	20.4	11.0	2.2
PA-Allentown MSA	794	63,221	12.8	18,127	88.4	73.3	49.0	3.6	24.4	8.0	2.3
PA-Chambersburg MSA	152	7,183	2.4	3,034	87.1	84.2	37.0	3.6	15.8	9.3	0.0
PA-East Stroudsburg MSA	55	1,853	0.9	4,358	90.7	80.0	48.1	2.5	16.4	6.9	3.6
PA-Gettysburg MSA	113	7,082	1.8	1,840	89.2	82.3	44.4	3.5	17.7	7.3	0.0
PA-Harrisburg MSA	302	16,387	4.9	11,247	85.3	76.2	41.1	3.9	20.5	10.7	3.3
PA-Lancaster MSA	803	86,145	12.9	13,518	88.1	71.2	50.8	4.5	27.6	7.4	1.1
PA-Lebanon MSA	85	5,278	1.4	2,517	87.0	81.2	52.3	4.0	16.5	8.9	2.4
PA-Montgomery County MD	1,954	159,105	31.4	71,284	89.7	71.8	44.9	4.1	25.5	6.2	2.7
PA-Philadelphia MD	551	45,893	8.9	53,108	92.1	80.0	44.0	2.5	20.0	5.4	0.0
PA-Reading MSA	489	45,197	7.9	9,186	87.6	72.2	50.2	4.3	26.8	8.1	1.0
PA-Scranton MSA	165	6,992	2.7	11,665	86.5	89.1	40.2	4.0	8.5	9.6	2.4
PA-State College MSA	68	6,608	1.1	2,677	85.1	70.6	52.0	3.9	25.0	11.0	4.4
PA-Williamsport MSA	89	7,620	1.4	2,016	84.7	76.4	46.5	4.2	20.2	11.0	3.4
PA-York MSA	327	21,282	5.3	8,254	87.7	81.0	48.8	3.9	16.5	8.4	2.4
<b>Total</b>	<b>6,216</b>	<b>496,399</b>	<b>100.0</b>	<b>218,154</b>	<b>89.3</b>	<b>74.8</b>	<b>45.6</b>	<b>3.6</b>	<b>23.2</b>	<b>7.1</b>	<b>2.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Pennsylvania: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
PA Non-MSA	3	97	1.1	297	0.0	0.0	0.0	1.5	0.0	0.3	80.2	66.7	80.8	18.3	33.3	18.9	0.0	0.0	0.0
PA-Allentown MSA	3	204	1.1	122	2.3	0.0	0.0	9.9	0.0	2.5	50.2	33.3	51.6	37.6	66.7	45.9	0.0	0.0	0.0
PA-Chambersburg MSA	2	58	0.8	143	1.0	0.0	0.0	2.7	0.0	0.0	89.5	100.0	93.0	6.8	0.0	7.0	0.0	0.0	0.0
PA-East Stroudsburg MSA	0	0	0.0	15	0.0	0.0	0.0	6.8	0.0	0.0	82.1	0.0	100.0	11.1	0.0	0.0	0.0	0.0	0.0
PA-Gettysburg MSA	1	158	0.4	136	0.0	0.0	0.0	1.3	0.0	1.5	82.7	100.0	80.9	16.0	0.0	17.6	0.0	0.0	0.0
PA-Harrisburg MSA	5	544	1.9	208	1.4	0.0	1.0	8.6	0.0	8.2	68.4	80.0	80.8	21.6	20.0	10.1	0.0	0.0	0.0
PA-Lancaster MSA	103	18,685	39.3	1,231	0.8	0.0	0.0	3.2	0.0	0.2	86.5	98.1	95.0	9.5	1.9	4.8	0.0	0.0	0.0
PA-Lebanon MSA	7	1,189	2.7	204	0.0	0.0	0.0	4.2	0.0	0.0	78.1	85.7	88.7	17.7	14.3	11.3	0.0	0.0	0.0
PA-Montgomery County MD	113	18,890	43.1	511	1.9	1.8	0.8	15.8	36.3	25.6	52.8	46.9	54.0	29.5	15.0	19.6	0.0	0.0	0.0
PA-Philadelphia MD	0	0	0.0	34	4.2	0.0	2.9	14.3	0.0	14.7	15.8	0.0	17.6	65.0	0.0	64.7	0.8	0.0	0.0
PA-Reading MSA	13	1,041	5.0	367	2.1	0.0	0.3	1.2	0.0	0.0	68.6	38.5	90.5	28.1	61.5	9.3	0.0	0.0	0.0
PA-Scranton MSA	2	218	0.8	54	1.8	0.0	0.0	10.4	0.0	3.7	54.1	0.0	66.7	33.5	100.0	27.8	0.3	0.0	1.9
PA-State College MSA	0	0	0.0	77	0.2	0.0	0.0	16.0	0.0	40.3	55.7	0.0	45.5	27.1	0.0	14.3	1.0	0.0	0.0
PA-Williamsport MSA	2	22	0.8	61	1.2	0.0	0.0	4.0	0.0	0.0	90.3	100.0	100.0	4.5	0.0	0.0	0.0	0.0	0.0
PA-York MSA	8	1,466	3.1	260	1.8	0.0	0.8	4.0	0.0	1.9	74.9	75.0	88.1	19.3	25.0	9.2	0.0	0.0	0.0
<b>Total</b>	<b>262</b>	<b>42,572</b>	<b>100.0</b>	<b>3,720</b>	<b>1.7</b>	<b>0.8</b>	<b>0.3</b>	<b>9.3</b>	<b>15.6</b>	<b>5.4</b>	<b>61.4</b>	<b>69.8</b>	<b>82.1</b>	<b>27.5</b>	<b>13.7</b>	<b>12.2</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Pennsylvania: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
PA Non-MSA	3	97	1.1	297	97.5	100.0	56.6	1.7	0.0	0.8	0.0	
PA-Allentown MSA	3	204	1.1	122	97.3	100.0	61.5	1.6	0.0	1.1	0.0	
PA-Chambersburg MSA	2	58	0.8	143	96.7	100.0	50.4	2.4	0.0	1.0	0.0	
PA-East Stroudsburg MSA	--		--	15	98.4	--	53.3	0.5	--	1.1	--	
PA-Gettysburg MSA	1	158	0.4	136	95.9	100.0	59.6	2.6	0.0	1.5	0.0	
PA-Harrisburg MSA	5	544	1.9	208	97.5	100.0	62.0	1.5	0.0	1.0	0.0	
PA-Lancaster MSA	103	18,685	39.3	1,231	96.7	87.4	80.5	2.4	12.6	1.0	0.0	
PA-Lebanon MSA	7	1,189	2.7	204	98.2	71.4	65.2	0.9	28.6	0.9	0.0	
PA-Montgomery County MD	113	18,890	43.1	511	95.6	75.2	66.1	3.0	24.8	1.4	0.0	
PA-Philadelphia MD	--		--	34	96.5	--	61.8	1.8	--	1.7	--	
PA-Reading MSA	13	1,041	5.0	367	96.8	38.5	73.3	1.9	61.5	1.2	0.0	
PA-Scranton MSA	2	218	0.8	54	97.4	100.0	66.7	1.9	0.0	0.8	0.0	
PA-State College MSA	--		--	77	97.6	--	83.1	1.2	--	1.2	--	
PA-Williamsport MSA	2	22	0.8	61	98.1	100.0	65.6	1.4	0.0	0.5	0.0	
PA-York MSA	8	1,466	3.1	260	97.7	75.0	69.2	1.0	25.0	1.3	0.0	
<b>Total</b>	<b>262</b>	<b>42,572</b>	<b>100.0</b>	<b>3,720</b>	<b>96.7</b>	<b>79.8</b>	<b>70.0</b>	<b>2.1</b>	<b>20.2</b>	<b>1.2</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**South Carolina: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
SC Non-MSA	445	111,177	7.2	12,565	0.0	0.0	0.0	8.2	2.5	4.7	60.4	25.4	41.3	31.4	72.1	54.0	0.0	0.0	0.0
SC-Charleston MSA	1,653	526,534	26.8	64,640	3.3	2.4	2.3	19.1	8.9	11.1	42.4	36.1	45.0	34.9	52.5	41.2	0.3	0.2	0.4
SC-Columbia MSA	1,006	224,259	16.3	45,914	2.7	0.7	1.6	24.6	11.5	14.1	36.0	29.6	32.3	36.7	58.2	52.0	0.0	0.0	0.0
SC-Florence MSA	130	21,454	2.1	6,357	1.3	0.8	0.3	16.5	6.2	9.6	51.9	34.6	44.2	30.3	58.5	45.8	0.0	0.0	0.0
SC-Greenville MSA	1,939	452,611	31.4	51,142	3.1	2.2	2.7	20.9	12.1	13.8	43.6	36.1	41.7	32.4	49.6	41.7	0.0	0.0	0.0
SC-Hilton Head MSA	414	129,526	6.7	18,601	0.0	0.0	0.0	27.1	13.8	18.4	45.1	51.2	52.3	27.8	35.0	29.3	0.0	0.0	0.0
SC-Spartanburg MSA	498	112,476	8.1	18,312	2.3	1.2	1.1	15.6	8.4	9.3	47.1	40.4	42.7	35.1	50.0	46.9	0.0	0.0	0.0
SC-Sumter MSA	85	13,730	1.4	5,068	0.0	0.0	0.0	16.8	7.1	6.8	53.8	45.9	44.7	29.4	47.1	48.5	0.0	0.0	0.0
<b>Total</b>	<b>6,170</b>	<b>1,591,767</b>	<b>100.0</b>	<b>222,599</b>	<b>2.3</b>	<b>1.6</b>	<b>1.7</b>	<b>19.6</b>	<b>10.1</b>	<b>12.3</b>	<b>44.7</b>	<b>35.7</b>	<b>41.8</b>	<b>33.4</b>	<b>52.6</b>	<b>44.1</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

South Carolina: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
SC Non-MSA	445	111,177	7.2	12,565	19.8	1.8	2.1	17.2	6.3	8.6	17.7	18.0	15.6	45.3	72.4	56.7	0.0	1.6	17.0
SC-Charleston MSA	1,653	526,534	26.8	64,640	22.6	5.5	5.2	16.7	18.6	16.5	19.9	20.7	19.7	40.8	54.1	37.6	0.0	1.1	21.1
SC-Columbia MSA	1,006	224,259	16.3	45,914	23.1	7.1	5.4	16.7	21.4	17.0	19.5	20.0	19.7	40.8	49.6	34.2	0.0	2.0	23.7
SC-Florence MSA	130	21,454	2.1	6,357	23.5	6.9	4.7	16.2	10.0	15.7	19.9	18.5	19.2	40.4	62.3	37.6	0.0	2.3	22.7
SC-Greenville MSA	1,939	452,611	31.4	51,142	22.9	6.6	6.5	17.1	20.9	18.2	18.8	21.4	20.8	41.2	49.3	36.5	0.0	1.9	18.1
SC-Hilton Head MSA	414	129,526	6.7	18,601	20.1	3.6	2.7	19.5	11.8	10.9	20.0	17.6	17.7	40.4	65.0	52.1	0.0	1.9	16.6
SC-Spartanburg MSA	498	112,476	8.1	18,312	21.0	8.8	6.4	17.4	21.7	21.5	18.9	26.1	22.1	42.7	41.0	30.3	0.0	2.4	19.7
SC-Sumter MSA	85	13,730	1.4	5,068	21.7	2.4	2.4	19.0	14.1	11.6	19.2	17.6	20.1	40.1	62.4	37.4	0.0	3.5	28.5
<b>Total</b>	<b>6,170</b>	<b>1,591,767</b>	<b>100.0</b>	<b>222,599</b>	<b>22.2</b>	<b>5.9</b>	<b>5.2</b>	<b>17.1</b>	<b>18.5</b>	<b>16.3</b>	<b>19.2</b>	<b>20.7</b>	<b>19.7</b>	<b>41.4</b>	<b>53.1</b>	<b>38.3</b>	<b>0.0</b>	<b>1.7</b>	<b>20.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



South Carolina: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
SC Non-MSA	313	15,733	5.9	6,028	0.0	0.0	0.0	9.7	7.0	7.9	55.0	51.1	51.2	35.3	41.9	40.8	0.0	0.0	0.0	
SC-Charleston MSA	915	61,614	17.3	25,339	7.6	7.5	7.0	18.6	16.4	16.0	34.6	33.1	34.0	37.6	42.4	41.3	1.5	0.5	1.7	
SC-Columbia MSA	1,128	72,068	21.4	19,179	8.6	4.6	6.1	23.8	22.1	21.0	32.3	39.5	33.3	34.7	33.4	39.3	0.6	0.4	0.2	
SC-Florence MSA	145	15,236	2.7	3,280	3.6	4.1	2.5	24.3	13.1	18.9	40.3	40.7	44.6	31.7	42.1	34.0	0.1	0.0	0.0	
SC-Greenville MSA	1,680	84,634	31.8	22,224	6.0	5.1	5.3	18.4	18.3	15.8	39.2	40.4	38.9	36.3	36.3	40.0	0.0	0.0	0.0	
SC-Hilton Head MSA	352	15,968	6.7	7,138	0.0	0.0	0.0	25.6	31.8	26.2	48.2	43.8	46.2	26.2	24.4	27.6	0.0	0.0	0.0	
SC-Spartanburg MSA	620	53,733	11.7	7,527	2.4	1.1	1.8	20.8	19.2	17.2	40.2	37.9	42.4	36.7	41.8	38.7	0.0	0.0	0.0	
SC-Sumter MSA	125	5,835	2.4	2,183	0.0	0.0	0.0	34.2	40.8	35.7	45.0	40.8	43.5	20.8	18.4	20.8	0.0	0.0	0.0	
<b>Total</b>	<b>5,278</b>	<b>324,821</b>	<b>100.0</b>	<b>92,898</b>	<b>5.5</b>	<b>4.1</b>	<b>4.7</b>	<b>20.4</b>	<b>19.5</b>	<b>17.9</b>	<b>38.8</b>	<b>39.5</b>	<b>38.3</b>	<b>34.8</b>	<b>36.6</b>	<b>38.6</b>	<b>0.5</b>	<b>0.2</b>	<b>0.5</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**South Carolina: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
SC Non-MSA	313	15,733	5.9	6,028	83.0	83.4	45.4	4.2	14.7	12.8	1.9
SC-Charleston MSA	915	61,614	17.3	25,339	85.5	76.1	45.2	4.2	22.3	10.4	1.6
SC-Columbia MSA	1,128	72,068	21.4	19,179	83.7	73.8	48.2	4.4	23.1	11.9	3.1
SC-Florence MSA	145	15,236	2.7	3,280	81.5	62.8	43.6	4.9	33.8	13.6	3.4
SC-Greenville MSA	1,680	84,634	31.8	22,224	83.7	79.6	48.0	4.9	18.4	11.4	2.0
SC-Hilton Head MSA	352	15,968	6.7	7,138	87.0	68.5	44.6	4.1	22.7	8.9	8.8
SC-Spartanburg MSA	620	53,733	11.7	7,527	82.4	76.0	46.0	5.4	22.3	12.2	1.8
SC-Sumter MSA	125	5,835	2.4	2,183	84.7	76.0	45.6	3.6	15.2	11.7	8.8
<b>Total</b>	<b>5,278</b>	<b>324,821</b>	<b>100.0</b>	<b>92,898</b>	<b>84.1</b>	<b>76.2</b>	<b>46.5</b>	<b>4.5</b>	<b>21.0</b>	<b>11.4</b>	<b>2.8</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

South Carolina: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
SC Non-MSA	2	80	10.5	225	0.0	0.0	0.0	8.3	50.0	7.6	67.1	50.0	72.0	24.6	0.0	20.4	0.0	0.0	0.0
SC-Charleston MSA	1	33	5.3	90	3.4	0.0	1.1	18.8	0.0	15.6	44.9	100.0	46.7	32.4	0.0	36.7	0.5	0.0	0.0
SC-Columbia MSA	5	338	26.3	220	2.4	0.0	0.5	27.4	40.0	40.0	37.9	40.0	45.0	32.2	20.0	14.5	0.1	0.0	0.0
SC-Florence MSA	4	308	21.1	108	0.2	0.0	1.9	15.8	0.0	13.9	57.3	25.0	52.8	26.7	75.0	31.5	0.0	0.0	0.0
SC-Greenville MSA	6	257	31.6	151	2.7	0.0	1.3	19.7	50.0	23.2	49.1	33.3	48.3	28.4	16.7	27.2	0.0	0.0	0.0
SC-Hilton Head MSA	0	0	0.0	31	0.0	0.0	0.0	36.4	0.0	41.9	46.6	0.0	45.2	17.0	0.0	12.9	0.0	0.0	0.0
SC-Spartanburg MSA	1	20	5.3	45	1.1	0.0	0.0	16.1	0.0	24.4	45.8	0.0	53.3	37.1	100.0	22.2	0.0	0.0	0.0
SC-Sumter MSA	0	0	0.0	108	0.0	0.0	0.0	18.0	0.0	13.0	70.4	0.0	82.4	11.6	0.0	4.6	0.0	0.0	0.0
<b>Total</b>	<b>19</b>	<b>1,036</b>	<b>100.0</b>	<b>978</b>	<b>1.9</b>	<b>0.0</b>	<b>0.6</b>	<b>20.4</b>	<b>31.6</b>	<b>21.2</b>	<b>49.1</b>	<b>36.8</b>	<b>57.3</b>	<b>28.4</b>	<b>31.6</b>	<b>21.0</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

South Carolina: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
SC Non-MSA	2	80	10.5	225	96.2	50.0	41.8	2.5	50.0	1.3	0.0
SC-Charleston MSA	1	33	5.3	90	94.0	100.0	56.7	3.2	0.0	2.8	0.0
SC-Columbia MSA	5	338	26.3	220	96.5	100.0	44.5	2.3	0.0	1.1	0.0
SC-Florence MSA	4	308	21.1	108	98.0	100.0	35.2	1.0	0.0	1.0	0.0
SC-Greenville MSA	6	257	31.6	151	97.1	66.7	52.3	1.3	33.3	1.6	0.0
SC-Hilton Head MSA	--		--	31	93.8	--	80.6	3.9	--	2.2	--
SC-Spartanburg MSA	1	20	5.3	45	96.5	100.0	35.6	1.6	0.0	1.9	0.0
SC-Sumter MSA	--		--	108	98.2	--	33.3	1.3	--	0.5	--
<b>Total</b>	<b>19</b>	<b>1,036</b>	<b>100.0</b>	<b>978</b>	<b>96.1</b>	<b>84.2</b>	<b>44.7</b>	<b>2.2</b>	<b>15.8</b>	<b>1.7</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Tennessee: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
TN Non-MSA	322	57,243	6.1	19,898	0.0	0.0	0.0	4.5	3.7	3.4	77.2	75.8	75.1	18.3	20.5	21.5	0.0	0.0	0.0	
TN-Cleveland MSA	144	20,813	2.7	6,250	3.9	6.3	3.9	8.1	4.9	5.5	49.6	38.9	45.6	38.4	50.0	45.0	0.0	0.0	0.0	
TN-Johnson City MSA	148	27,186	2.8	8,477	0.0	0.0	0.0	23.8	18.9	18.7	54.0	42.6	51.5	22.2	38.5	29.8	0.0	0.0	0.0	
TN-Knoxville MSA	1,284	307,504	24.3	50,727	2.4	1.0	1.9	18.8	11.6	14.5	50.0	42.4	48.1	28.8	44.9	35.4	0.0	0.1	0.0	
TN-Morristown MSA	123	18,171	2.3	5,993	0.8	0.0	0.7	17.1	13.0	13.6	63.6	60.2	65.4	18.6	26.8	20.4	0.0	0.0	0.0	
TN-Nashville MSA	3,255	959,787	61.7	147,903	3.4	5.7	4.2	19.5	15.0	15.6	43.7	34.2	42.0	33.3	45.1	38.1	0.1	0.0	0.1	
<b>Total</b>	<b>5,276</b>	<b>1,390,704</b>	<b>100.0</b>	<b>239,248</b>	<b>2.4</b>	<b>3.9</b>	<b>3.1</b>	<b>17.3</b>	<b>13.3</b>	<b>14.2</b>	<b>51.2</b>	<b>39.7</b>	<b>47.1</b>	<b>29.1</b>	<b>43.1</b>	<b>35.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Tennessee: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
TN Non-MSA	322	57,243	6.1	19,898	19.0	5.6	2.7	18.3	12.4	11.1	20.5	19.9	17.6	42.2	59.9	48.4	0.0	2.2	20.2
TN-Cleveland MSA	144	20,813	2.7	6,250	22.4	4.2	3.4	17.3	16.7	14.5	18.7	21.5	19.5	41.5	52.8	39.3	0.0	4.9	23.3
TN-Johnson City MSA	148	27,186	2.8	8,477	21.9	4.7	6.7	17.0	14.9	17.9	21.6	20.9	20.3	39.6	56.8	38.7	0.0	2.7	16.4
TN-Knoxville MSA	1,284	307,504	24.3	50,727	22.4	5.5	5.6	16.8	20.1	16.7	19.8	18.2	19.1	41.0	54.5	40.9	0.0	1.7	17.8
TN-Morristown MSA	123	18,171	2.3	5,993	23.8	5.7	4.5	18.8	19.5	15.8	20.3	20.3	19.3	37.1	52.8	40.5	0.0	1.6	19.9
TN-Nashville MSA	3,255	959,787	61.7	147,903	20.7	4.8	5.0	17.7	17.5	16.3	20.4	21.7	19.6	41.1	54.8	39.8	0.0	1.2	19.3
<b>Total</b>	<b>5,276</b>	<b>1,390,704</b>	<b>100.0</b>	<b>239,248</b>	<b>21.2</b>	<b>5.0</b>	<b>5.0</b>	<b>17.5</b>	<b>17.7</b>	<b>15.9</b>	<b>20.3</b>	<b>20.7</b>	<b>19.3</b>	<b>41.0</b>	<b>55.0</b>	<b>40.7</b>	<b>0.0</b>	<b>1.6</b>	<b>19.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Tennessee: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
TN Non-MSA	327	13,331	7.7	6,783	0.0	0.0	0.0	10.9	8.3	9.1	72.5	77.1	73.8	16.6	14.7	17.1	0.0	0.0	0.0
TN-Cleveland MSA	133	7,291	3.1	2,029	7.0	6.8	5.9	13.0	6.0	12.4	50.2	48.9	45.5	29.8	38.3	36.1	0.0	0.0	0.0
TN-Johnson City MSA	234	7,221	5.5	3,559	0.0	0.0	0.0	22.7	18.8	20.8	43.8	48.7	44.0	33.1	32.5	35.2	0.4	0.0	0.1
TN-Knoxville MSA	1,180	56,866	27.8	17,552	4.0	1.9	3.4	18.1	17.2	16.4	41.3	40.6	42.4	35.9	39.4	37.3	0.7	0.8	0.5
TN-Morristown MSA	178	4,368	4.2	2,087	6.3	1.7	4.2	22.5	17.4	18.2	55.8	58.4	58.3	15.4	22.5	19.3	0.0	0.0	0.0
TN-Nashville MSA	2,185	76,640	51.6	58,456	7.6	7.6	7.6	20.3	17.4	19.9	31.1	31.0	32.0	40.2	43.1	39.8	0.8	0.9	0.8
<b>Total</b>	<b>4,237</b>	<b>165,717</b>	<b>100.0</b>	<b>90,466</b>	<b>5.8</b>	<b>4.7</b>	<b>5.8</b>	<b>19.0</b>	<b>16.4</b>	<b>18.2</b>	<b>38.5</b>	<b>39.9</b>	<b>38.5</b>	<b>36.1</b>	<b>38.3</b>	<b>36.9</b>	<b>0.6</b>	<b>0.7</b>	<b>0.6</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Tennessee: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
TN Non-MSA	327	13,331	7.7	6,783	84.3	85.9	47.4	3.8	13.8	11.9	0.3
TN-Cleveland MSA	133	7,291	3.1	2,029	86.0	80.5	50.2	4.0	17.3	10.0	2.3
TN-Johnson City MSA	234	7,221	5.5	3,559	84.8	75.6	48.3	3.9	20.9	11.3	3.4
TN-Knoxville MSA	1,180	56,866	27.8	17,552	84.9	82.1	47.4	4.5	16.4	10.6	1.5
TN-Morristown MSA	178	4,368	4.2	2,087	83.6	68.5	43.4	4.2	23.6	12.2	7.9
TN-Nashville MSA	2,185	76,640	51.6	58,456	88.2	77.4	49.2	3.5	16.9	8.2	5.7
<b>Total</b>	<b>4,237</b>	<b>165,717</b>	<b>100.0</b>	<b>90,466</b>	<b>86.9</b>	<b>79.0</b>	<b>48.5</b>	<b>3.8</b>	<b>17.0</b>	<b>9.3</b>	<b>4.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Tennessee: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
TN Non-MSA	4	191	57.1	289	0.0	0.0	0.0	5.3	0.0	4.5	80.6	100.0	87.2	14.1	0.0	8.3	0.0	0.0	0.0
TN-Cleveland MSA	2	243	28.6	39	0.9	0.0	0.0	6.6	0.0	2.6	50.6	50.0	53.8	41.9	50.0	43.6	0.0	0.0	0.0
TN-Johnson City MSA	0	0	0.0	116	0.0	0.0	0.0	18.9	0.0	6.0	56.8	0.0	78.4	24.3	0.0	15.5	0.0	0.0	0.0
TN-Knoxville MSA	1	21	14.3	117	2.0	0.0	0.0	17.6	0.0	23.9	50.2	100.0	51.3	29.9	0.0	24.8	0.3	0.0	0.0
TN-Morristown MSA	0	0	0.0	73	1.5	0.0	0.0	11.9	0.0	12.3	66.6	0.0	74.0	20.1	0.0	13.7	0.0	0.0	0.0
TN-Nashville MSA	0	0	0.0	972	3.5	0.0	1.2	18.9	0.0	25.5	45.2	0.0	60.6	32.1	0.0	12.4	0.4	0.0	0.2
<b>Total</b>	<b>7</b>	<b>455</b>	<b>100.0</b>	<b>1,606</b>	<b>2.3</b>	<b>0.0</b>	<b>0.7</b>	<b>16.0</b>	<b>0.0</b>	<b>19.1</b>	<b>52.9</b>	<b>85.7</b>	<b>66.4</b>	<b>28.6</b>	<b>14.3</b>	<b>13.6</b>	<b>0.3</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Tennessee: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues**

**2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
TN Non-MSA	4	191	57.1	289	96.7	75.0	38.1	0.5	25.0	2.8	0.0
TN-Cleveland MSA	2	243	28.6	39	95.6	100.0	41.0	1.9	0.0	2.5	0.0
TN-Johnson City MSA	--		--	116	93.6	--	35.3	2.0	--	4.3	--
TN-Knoxville MSA	1	21	14.3	117	95.4	100.0	53.8	1.6	0.0	2.9	0.0
TN-Morristown MSA	--		--	73	95.6	--	38.4	0.9	--	3.5	--
TN-Nashville MSA	--		--	972	96.7	--	66.5	1.5	--	1.8	--
<b>Total</b>	<b>7</b>	<b>455</b>	<b>100.0</b>	<b>1,606</b>	<b>96.2</b>	<b>85.7</b>	<b>56.3</b>	<b>1.4</b>	<b>14.3</b>	<b>2.4</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Alabama: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
AL-Non-MSA	171	29,271	6.0	15,238	0.0	0.0	0.0	10.0	8.8	6.2	60.3	54.4	52.5	29.7	36.8	41.3	0.0	0.0	0.0
AL-Anniston MSA	72	10,781	2.5	3,975	3.2	0.0	0.5	15.2	6.9	11.8	69.3	76.4	74.2	11.8	16.7	13.0	0.5	0.0	0.4
AL-Auburn MSA	178	53,098	6.3	8,897	1.8	0.6	0.3	12.5	18.5	13.4	70.9	64.6	69.9	14.3	16.3	15.5	0.5	0.0	0.9
AL-Birmingham MSA	855	217,895	30.1	56,876	5.1	1.4	1.5	21.7	13.0	12.7	35.2	30.1	32.5	37.9	55.4	53.1	0.0	0.1	0.0
AL-Daphne MSA	314	75,392	11.1	19,211	0.0	0.0	0.0	14.9	18.5	15.7	65.0	56.1	57.4	20.1	25.5	26.9	0.0	0.0	0.0
AL-Dothan MSA	48	9,718	1.7	6,193	1.3	0.0	0.6	14.1	12.5	9.6	62.2	35.4	55.2	22.5	52.1	34.6	0.0	0.0	0.0
AL-Florence MSA	154	28,617	5.4	6,859	1.5	0.0	0.5	11.7	8.4	10.3	66.6	57.8	64.2	20.2	33.8	24.9	0.0	0.0	0.0
AL-Gadsden MSA	51	9,438	1.8	3,495	4.0	2.0	1.0	19.7	7.8	9.7	43.5	33.3	38.2	32.9	56.9	51.1	0.0	0.0	0.0
AL-Huntsville MSA	500	134,123	17.6	35,682	4.0	3.4	2.2	24.5	16.4	16.0	33.8	31.2	36.7	37.7	49.0	45.1	0.0	0.0	0.0
AL-Mobile MSA	164	37,933	5.8	16,459	5.4	0.0	1.1	14.3	9.1	7.3	41.5	37.2	36.2	38.9	53.7	55.4	0.0	0.0	0.0
AL-Montgomery MSA	125	27,856	4.4	16,329	6.4	0.8	0.8	19.2	12.0	9.9	37.2	27.2	34.2	37.1	60.0	54.9	0.0	0.0	0.1
AL-Tuscaloosa MSA	208	47,269	7.3	10,847	3.1	0.0	0.6	21.2	7.7	10.4	40.3	33.2	37.0	35.0	59.1	51.3	0.4	0.0	0.6
<b>Total</b>	<b>2,840</b>	<b>681,391</b>	<b>100.0</b>	<b>200,061</b>	<b>3.6</b>	<b>1.1</b>	<b>1.1</b>	<b>17.8</b>	<b>13.1</b>	<b>12.1</b>	<b>45.9</b>	<b>40.1</b>	<b>42.3</b>	<b>32.7</b>	<b>45.6</b>	<b>44.5</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Alabama: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
AL Non-MSA	171	29,271	6.0	15,238	22.9	2.9	3.5	17.8	16.4	12.1	18.7	15.2	19.0	40.6	62.0	45.2	0.0	3.5	20.3
AL-Anniston MSA	72	10,781	2.5	3,975	22.9	15.3	6.9	16.2	27.8	19.5	20.9	22.2	23.0	40.0	31.9	26.4	0.0	2.8	24.3
AL-Auburn MSA	178	53,098	6.3	8,897	24.8	7.3	5.6	15.2	26.4	17.6	18.6	18.0	21.2	41.4	44.9	36.0	0.0	3.4	19.6
AL-Birmingham MSA	855	217,895	30.1	56,876	23.6	8.4	5.9	15.7	27.8	16.5	18.7	16.0	20.0	42.1	46.3	38.8	0.0	1.4	18.7
AL-Daphne MSA	314	75,392	11.1	19,211	20.6	8.6	5.3	17.7	22.6	14.5	20.9	21.0	19.2	40.9	43.9	42.1	0.0	3.8	18.9
AL-Dothan MSA	48	9,718	1.7	6,193	22.5	0.0	5.8	17.0	25.0	14.4	18.8	20.8	17.6	41.7	52.1	33.6	0.0	2.1	28.7
AL-Florence MSA	154	28,617	5.4	6,859	21.4	7.8	7.5	17.4	26.6	16.7	20.8	21.4	19.3	40.4	43.5	33.8	0.0	0.6	22.7
AL-Gadsden MSA	51	9,438	1.8	3,495	24.6	15.7	8.6	16.1	33.3	18.5	19.2	21.6	23.6	40.1	29.4	29.2	0.0	0.0	20.0
AL-Huntsville MSA	500	134,123	17.6	35,682	23.8	9.6	6.3	16.9	25.0	14.4	17.3	19.2	18.3	41.9	44.2	36.6	0.0	2.0	24.3
AL-Mobile MSA	164	37,933	5.8	16,459	23.8	4.9	4.6	15.6	19.5	15.8	19.1	18.9	20.8	41.5	54.3	38.7	0.0	2.4	20.1
AL-Montgomery MSA	125	27,856	4.4	16,329	24.5	8.8	5.6	16.1	24.8	16.7	18.2	19.2	19.2	41.2	44.0	35.5	0.0	3.2	23.0
AL-Tuscaloosa MSA	208	47,269	7.3	10,847	24.8	7.2	4.1	15.9	30.8	14.0	17.9	20.2	18.3	41.4	41.3	33.5	0.0	0.5	30.1
<b>Total</b>	<b>2,840</b>	<b>681,391</b>	<b>100.0</b>	<b>200,061</b>	<b>23.5</b>	<b>8.1</b>	<b>5.6</b>	<b>16.4</b>	<b>25.6</b>	<b>15.5</b>	<b>18.8</b>	<b>18.5</b>	<b>19.5</b>	<b>41.4</b>	<b>45.8</b>	<b>37.8</b>	<b>0.0</b>	<b>2.1</b>	<b>21.5</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Alabama: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
AL-Non-MSA	245	9,100	10.7	7,617	0.0	0.0	0.0	11.2	12.7	11.0	57.9	62.9	60.0	30.9	24.5	29.0	0.0	0.0	0.0
AL-Anniston MSA	99	6,366	4.3	1,444	5.0	4.0	3.2	30.2	24.2	26.0	55.1	59.6	61.3	7.9	10.1	8.7	1.8	2.0	0.8
AL-Auburn MSA	105	5,623	4.6	3,506	1.5	0.0	0.7	32.3	26.7	28.6	53.4	64.8	57.0	11.6	7.6	13.0	1.1	1.0	0.7
AL-Birmingham MSA	755	50,378	33.0	26,925	7.1	6.2	6.7	22.4	21.9	20.1	28.7	32.6	26.9	40.5	38.5	45.4	1.3	0.8	0.8
AL-Daphne MSA	214	11,413	9.3	7,888	0.0	0.0	0.0	19.2	16.8	16.8	59.6	63.1	57.5	21.2	20.1	25.7	0.0	0.0	0.0
AL-Dothan MSA	55	1,458	2.4	3,409	7.3	9.1	8.7	17.6	10.9	15.3	46.8	54.5	45.0	28.2	25.5	31.0	0.0	0.0	0.0
AL-Florence MSA	37	691	1.6	2,744	9.5	13.5	7.4	15.2	13.5	11.7	55.2	59.5	55.5	20.0	13.5	25.5	0.0	0.0	0.0
AL-Gadsden MSA	37	3,242	1.6	1,732	5.2	0.0	3.5	21.1	10.8	18.9	47.1	43.2	47.7	26.7	45.9	29.9	0.0	0.0	0.0
AL-Huntsville MSA	168	9,046	7.3	9,833	10.4	9.5	11.8	25.4	20.8	22.0	30.0	33.9	30.7	34.2	35.7	35.5	0.0	0.0	0.0
AL-Mobile MSA	203	14,768	8.9	11,777	6.9	3.4	6.5	19.8	14.3	17.9	32.9	39.9	32.7	40.3	42.4	42.9	0.2	0.0	0.0
AL-Montgomery MSA	267	12,180	11.7	8,644	7.2	3.4	6.4	18.4	19.1	16.6	36.1	31.8	33.8	34.4	44.2	39.8	3.9	1.5	3.4
AL-Tuscaloosa MSA	105	8,527	4.6	5,364	2.3	1.9	2.2	30.0	19.0	29.6	36.2	41.9	34.6	29.3	37.1	32.7	2.4	0.0	0.8
<b>Total</b>	<b>2,290</b>	<b>132,792</b>	<b>100.0</b>	<b>90,883</b>	<b>5.8</b>	<b>4.1</b>	<b>5.5</b>	<b>21.3</b>	<b>19.0</b>	<b>19.2</b>	<b>38.9</b>	<b>43.5</b>	<b>38.3</b>	<b>33.0</b>	<b>32.8</b>	<b>36.4</b>	<b>1.0</b>	<b>0.6</b>	<b>0.7</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Alabama: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
AL Non-MSA	245	9,100	10.7	7,617	80.1	79.6	36.3	4.9	18.0	15.0	2.4
AL-Anniston MSA	99	6,366	4.3	1,444	79.4	80.8	38.4	5.4	14.1	15.2	5.1
AL-Auburn MSA	105	5,623	4.6	3,506	84.0	72.4	39.8	4.1	23.8	11.9	3.8
AL-Birmingham MSA	755	50,378	33.0	26,925	83.6	78.8	41.6	5.4	20.5	11.0	0.7
AL-Daphne MSA	214	11,413	9.3	7,888	86.5	80.4	41.3	3.8	19.2	9.7	0.5
AL-Dothan MSA	55	1,458	2.4	3,409	81.6	83.6	39.0	5.6	12.7	12.7	3.6
AL-Florence MSA	37	691	1.6	2,744	82.0	89.2	57.2	5.1	8.1	12.9	2.7
AL-Gadsden MSA	37	3,242	1.6	1,732	81.5	81.1	36.7	5.2	18.9	13.3	0.0
AL-Huntsville MSA	168	9,046	7.3	9,833	84.3	73.8	45.6	4.4	22.0	11.3	4.2
AL-Mobile MSA	203	14,768	8.9	11,777	82.7	68.5	38.4	5.2	30.5	12.2	1.0
AL-Montgomery MSA	267	12,180	11.7	8,644	81.1	85.0	37.3	4.9	15.0	14.0	0.0
AL-Tuscaloosa MSA	105	8,527	4.6	5,364	82.6	75.2	44.5	5.1	24.8	12.4	0.0
<b>Total</b>	<b>2,290</b>	<b>132,792</b>	<b>100.0</b>	<b>90,883</b>	<b>82.9</b>	<b>78.4</b>	<b>41.1</b>	<b>5.0</b>	<b>20.1</b>	<b>12.1</b>	<b>1.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Alabama: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
AL Non-MSA	2	80	14.3	449	0.0	0.0	0.0	8.8	0.0	10.7	61.4	50.0	64.4	29.8	50.0	24.9	0.0	0.0	0.0
AL-Anniston MSA	0	0	0.0	15	1.7	0.0	0.0	17.9	0.0	6.7	69.8	0.0	73.3	10.1	0.0	13.3	0.6	0.0	6.7
AL-Auburn MSA	1	20	7.1	39	1.1	0.0	0.0	18.6	0.0	7.7	66.4	100.0	82.1	13.9	0.0	10.3	0.0	0.0	0.0
AL-Birmingham MSA	2	94	14.3	221	3.1	0.0	0.9	21.2	0.0	36.7	32.0	100.0	33.9	43.2	0.0	28.5	0.5	0.0	0.0
AL-Daphne MSA	2	58	14.3	92	0.0	0.0	0.0	19.6	0.0	28.3	62.2	0.0	44.6	18.2	100.0	27.2	0.0	0.0	0.0
AL-Dothan MSA	0	0	0.0	267	1.0	0.0	0.4	15.0	0.0	11.2	62.9	0.0	62.9	21.1	0.0	25.5	0.0	0.0	0.0
AL-Florence MSA	0	0	0.0	94	4.4	0.0	1.1	8.8	0.0	8.5	66.9	0.0	66.0	19.9	0.0	24.5	0.0	0.0	0.0
AL-Gadsden MSA	1	39	7.1	39	1.1	0.0	5.1	15.0	0.0	15.4	49.4	0.0	71.8	34.4	100.0	7.7	0.0	0.0	0.0
AL-Huntsville MSA	2	55	14.3	190	5.6	0.0	2.1	27.2	50.0	47.4	37.9	50.0	37.9	29.3	0.0	12.6	0.0	0.0	0.0
AL-Mobile MSA	0	0	0.0	132	3.7	0.0	2.3	9.1	0.0	6.1	46.7	0.0	62.1	40.5	0.0	29.5	0.0	0.0	0.0
AL-Montgomery MSA	3	392	21.4	177	4.2	0.0	2.8	19.6	0.0	31.6	41.0	66.7	41.8	34.6	33.3	23.2	0.5	0.0	0.6
AL-Tuscaloosa MSA	1	321	7.1	174	2.3	0.0	8.6	32.8	0.0	50.6	32.4	100.0	31.0	32.4	0.0	9.8	0.2	0.0	0.0
<b>Total</b>	<b>14</b>	<b>1,059</b>	<b>100.0</b>	<b>1,889</b>	<b>2.6</b>	<b>0.0</b>	<b>1.7</b>	<b>18.4</b>	<b>7.1</b>	<b>23.6</b>	<b>47.3</b>	<b>57.1</b>	<b>52.3</b>	<b>31.5</b>	<b>35.7</b>	<b>22.3</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Alabama: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
AL Non-MSA	2	80	14.3	449	97.4	50.0	31.0	1.4	50.0	1.1	0.0	
AL-Anniston MSA	--		--	15	97.8	--	33.3	1.1	--	1.1	--	
AL-Auburn MSA	1	20	7.1	39	94.3	100.0	51.3	2.1	0.0	3.6	0.0	
AL-Birmingham MSA	2	94	14.3	221	95.7	50.0	30.3	2.6	50.0	1.7	0.0	
AL-Daphne MSA	2 <sup>58</sup>		14.3	92	94.8	100.0	35.9	2.8	0.0	2.4	0.0	
AL-Dothan MSA	--		--	267	97.6	--	40.1	0.9	--	1.5	--	
AL-Florence MSA	--		--	94	98.6	--	38.3	1.4	--	0.0	--	
AL-Gadsden MSA	1 <sup>58</sup>		7.1	39	98.3	100.0	20.5	0.0	0.0	1.7	0.0	
AL-Huntsville MSA	2 <sup>58</sup>		14.3	190	96.1	100.0	43.7	2.1	0.0	1.8	0.0	
AL-Mobile MSA	-- <sup>58</sup>		--	132	95.5	--	54.5	3.2	--	1.2	--	
AL-Montgomery MSA	3 <sup>58</sup>	392	21.4	177	95.2	33.3	29.4	2.6	66.7	2.2	0.0	
AL-Tuscaloosa MSA	1 <sup>58</sup>	321	7.1	174	97.2	0.0	54.0	1.7	100.0	1.1	0.0	
<b>Total</b>	<b>14</b>	<b>1,059</b>	<b>100.0</b>	<b>1,889</b>	<b>96.3</b>	<b>64.3</b>	<b>37.9</b>	<b>2.1</b>	<b>35.7</b>	<b>1.6</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



New Jersey: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
NJ-Atlantic City MSA	158	38,475	5.5	14,810	3.4	2.5	2.5	16.3	9.5	13.0	39.3	38.0	38.0	40.1	48.7	45.0	1.0	1.3	1.5	
NJ-Camden MD	517	127,281	17.9	73,417	3.1	1.0	1.1	12.5	10.8	11.2	51.8	49.1	52.0	32.5	39.1	35.6	0.0	0.0	0.0	
NJ-New Brunswick MD	1,985	858,161	68.9	146,311	3.6	4.8	3.7	17.0	20.0	16.2	45.8	39.0	45.8	33.6	36.1	34.3	0.0	0.1	0.0	
NJ-Trenton MSA	138	48,419	4.8	16,575	7.3	0.7	3.5	16.9	11.6	14.2	32.3	35.5	32.7	43.5	52.2	49.6	0.0	0.0	0.0	
NJ-Vineland MSA	83	9,312	2.9	4,748	2.2	2.4	0.8	7.7	3.6	7.8	55.5	49.4	53.0	34.7	44.6	38.4	0.0	0.0	0.0	
<b>Total</b>	<b>2,881</b>	<b>1,081,649</b>	<b>100.0</b>	<b>255,861</b>	<b>3.7</b>	<b>3.7</b>	<b>2.8</b>	<b>15.4</b>	<b>16.9</b>	<b>14.3</b>	<b>46.5</b>	<b>40.9</b>	<b>46.4</b>	<b>34.4</b>	<b>38.4</b>	<b>36.4</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

New Jersey: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NJ-Atlantic City MSA	158	38,475	5.5	14,810	22.8	1.3	4.3	17.0	31.0	15.9	18.5	13.9	19.5	41.7	53.2	40.7	0.0	0.6	19.6
NJ-Camden MD	517	127,281	17.9	73,417	21.1	8.1	6.8	17.1	37.7	20.0	21.4	20.5	21.7	40.3	32.9	29.5	0.0	0.8	21.9
NJ-New Brunswick MD	1,985	858,161	68.9	146,311	15.3	7.1	6.3	13.3	32.2	18.1	17.7	20.6	22.7	53.6	39.7	37.4	0.0	0.4	15.5
NJ-Trenton MSA	138	48,419	4.8	16,575	23.9	8.0	7.2	16.6	21.7	17.2	18.5	23.9	19.5	41.1	44.9	40.5	0.0	1.4	15.6
NJ-Vineland MSA	83	9,312	2.9	4,748	21.2	7.2	3.6	17.6	19.3	16.1	19.5	26.5	23.9	41.8	42.2	31.0	0.0	4.8	25.5
<b>Total</b>	<b>2,881</b>	<b>1,081,649</b>	<b>100.0</b>	<b>255,861</b>	<b>18.3</b>	<b>7.0</b>	<b>6.3</b>	<b>15.1</b>	<b>32.3</b>	<b>18.4</b>	<b>18.9</b>	<b>20.5</b>	<b>22.1</b>	<b>47.7</b>	<b>39.6</b>	<b>35.4</b>	<b>0.0</b>	<b>0.6</b>	<b>17.8</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**New Jersey: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NJ-Atlantic City MSA	188	12,000	10.7	7,814	9.7	1.6	9.0	18.8	11.2	18.1	33.3	45.7	32.7	37.3	41.5	39.1	0.9	0.0	1.0
NJ-Camden MD	669	54,716	38.0	35,457	3.9	2.5	2.7	12.7	10.3	11.6	49.0	52.3	49.4	34.3	34.8	36.3	0.1	0.0	0.1
NJ-New Brunswick MD	574	21,566	32.6	98,235	6.6	5.4	7.4	15.5	15.9	16.6	44.1	44.3	42.0	33.7	34.5	34.0	0.0	0.0	0.0
NJ-Trenton MSA	141	4,168	8.0	11,372	10.4	6.4	6.3	17.2	22.0	17.3	29.3	45.4	30.0	43.1	26.2	46.4	0.0	0.0	0.0
NJ-Vineland MSA	188	14,653	10.7	2,846	7.6	2.7	13.8	16.0	10.1	14.0	50.1	53.7	47.5	26.2	33.5	24.7	0.1	0.0	0.0
<b>Total</b>	<b>1,760</b>	<b>107,103</b>	<b>100.0</b>	<b>155,724</b>	<b>6.5</b>	<b>3.7</b>	<b>6.5</b>	<b>15.2</b>	<b>13.1</b>	<b>15.5</b>	<b>43.6</b>	<b>48.6</b>	<b>42.4</b>	<b>34.7</b>	<b>34.6</b>	<b>35.5</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

New Jersey: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NJ-Atlantic City MSA	188	12,000	10.7	7,814	89.0	80.3	42.4	3.4	19.7	7.6	0.0
NJ-Camden MD	669	54,716	38.0	35,457	88.7	72.2	44.9	4.0	25.4	7.3	2.4
NJ-New Brunswick MD	574	21,566	32.6	98,235	90.4	86.8	43.6	3.8	12.7	5.7	0.5
NJ-Trenton MSA	141	4,168	8.0	11,372	87.4	87.2	43.8	4.7	12.8	8.0	0.0
NJ-Vineland MSA	188	14,653	10.7	2,846	86.3	72.9	41.3	4.8	26.1	8.9	1.1
<b>Total</b>	<b>1,760</b>	<b>107,103</b>	<b>100.0</b>	<b>155,724</b>	<b>89.6</b>	<b>79.1</b>	<b>43.8</b>	<b>3.9</b>	<b>19.7</b>	<b>6.5</b>	<b>1.2</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

New Jersey: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
NJ-Atlantic City MSA	4	663	26.7	54	1.9	0.0	0.0	12.5	0.0	5.6	41.3	50.0	35.2	43.2	50.0	57.4	1.1	0.0	1.9
NJ-Camden MD	4	926	26.7	151	1.6	0.0	0.0	9.6	0.0	5.3	50.4	75.0	35.1	38.5	25.0	59.6	0.0	0.0	0.0
NJ-New Brunswick MD	0	0	0.0	229	4.7	0.0	0.0	15.1	0.0	5.2	42.5	0.0	36.7	37.7	0.0	58.1	0.0	0.0	0.0
NJ-Trenton MSA	0	0	0.0	35	9.0	0.0	0.0	20.2	0.0	5.7	29.8	0.0	37.1	41.0	0.0	57.1	0.0	0.0	0.0
NJ-Vineland MSA	7	763	46.7	44	3.2	0.0	0.0	5.0	0.0	0.0	51.4	28.6	36.4	40.5	71.4	63.6	0.0	0.0	0.0
<b>Total</b>	<b>15</b>	<b>2,352</b>	<b>100.0</b>	<b>513</b>	<b>4.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.5</b>	<b>0.0</b>	<b>4.9</b>	<b>43.7</b>	<b>46.7</b>	<b>36.1</b>	<b>38.6</b>	<b>53.3</b>	<b>58.9</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

New Jersey: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
NJ-Atlantic City MSA	4	663	26.7	54	96.1	50.0	59.3	3.3	50.0	0.7	0.0	
NJ-Camden MD	4	926	26.7	151	95.7	50.0	56.3	2.8	50.0	1.5	0.0	
NJ-New Brunswick MD	--		--	229	96.8	--	64.2	2.0	--	1.2	--	
NJ-Trenton MSA	--		--	35	97.4	--	68.6	1.3	--	1.3	--	
NJ-Vineland MSA	7	763	46.7	44	95.7	85.7	63.6	3.2	14.3	1.1	0.0	
<b>Total</b>	<b>15</b>	<b>2,352</b>	<b>100.0</b>	<b>513</b>	<b>96.5</b>	<b>66.7</b>	<b>61.6</b>	<b>2.3</b>	<b>33.3</b>	<b>1.2</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

West Virginia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
WV Non-MSA	402	51,881	26.7	7,540	0.1	0.2	0.1	10.3	6.0	5.8	60.3	48.0	51.0	29.3	45.8	43.1	0.0	0.0	0.0
WV-Beckley MSA	152	22,302	10.1	2,592	0.0	0.0	0.0	7.9	5.3	4.5	81.3	74.3	77.7	10.7	20.4	17.8	0.0	0.0	0.0
WV-Charleston MSA	295	37,183	19.6	6,330	0.8	0.3	0.5	16.3	6.1	12.9	57.7	44.1	49.1	25.2	49.5	37.6	0.0	0.0	0.0
WV-Huntington MSA	193	26,147	12.8	5,727	3.2	2.1	2.0	13.2	3.1	6.3	49.4	44.0	47.3	34.1	50.8	44.3	0.0	0.0	0.2
WV-Morgantown MSA	220	40,285	14.6	5,172	0.0	0.0	0.2	21.7	13.6	14.8	50.1	37.7	42.4	28.2	48.6	42.7	0.0	0.0	0.0
WV-Parkersburg MSA	66	7,766	4.4	2,646	0.0	0.0	0.0	7.9	3.0	5.3	69.7	59.1	67.0	22.4	37.9	27.7	0.0	0.0	0.0
WV-Wheeling MSA	180	26,799	11.9	1,787	0.0	0.0	0.0	8.4	0.6	4.6	65.3	61.1	58.5	26.2	38.3	36.9	0.0	0.0	0.0
<b>Total</b>	<b>1,508</b>	<b>212,363</b>	<b>100.0</b>	<b>31,794</b>	<b>0.7</b>	<b>0.4</b>	<b>0.5</b>	<b>12.6</b>	<b>5.9</b>	<b>8.5</b>	<b>60.3</b>	<b>49.9</b>	<b>52.5</b>	<b>26.4</b>	<b>43.8</b>	<b>38.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

West Virginia: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
WV Non-MSA	402	51,881	26.7	7,540	21.4	5.0	4.3	16.7	15.4	12.6	18.8	25.6	20.4	43.1	51.7	45.8	0.0	2.2	16.9
WV-Beckley MSA	152	22,302	10.1	2,592	20.7	5.3	5.7	18.2	12.5	15.3	20.7	28.3	21.0	40.5	50.0	44.9	0.0	3.9	13.1
WV-Charleston MSA	295	37,183	19.6	6,330	22.2	6.4	6.2	17.7	16.9	17.4	18.8	19.3	22.3	41.3	54.2	39.6	0.0	3.1	14.5
WV-Huntington MSA	193	26,147	12.8	5,727	21.8	6.7	5.3	16.5	17.1	14.1	19.7	23.3	20.3	42.1	48.7	45.8	0.0	4.1	14.6
WV-Morgantown MSA	220	40,285	14.6	5,172	22.1	11.8	5.9	16.5	15.5	15.3	22.0	18.6	19.4	39.4	51.4	45.0	0.0	2.7	14.4
WV-Parkersburg MSA	66	7,766	4.4	2,646	20.5	7.6	8.2	17.5	18.2	17.7	20.6	15.2	21.2	41.3	57.6	39.2	0.0	1.5	13.7
WV-Wheeling MSA	180	26,799	11.9	1,787	19.4	7.2	6.4	18.7	27.8	17.3	20.6	23.9	21.8	41.2	39.4	39.1	0.0	1.7	15.4
<b>Total</b>	<b>1,508</b>	<b>212,363</b>	<b>100.0</b>	<b>31,794</b>	<b>21.4</b>	<b>6.9</b>	<b>5.7</b>	<b>17.2</b>	<b>17.2</b>	<b>15.2</b>	<b>19.7</b>	<b>22.7</b>	<b>20.8</b>	<b>41.7</b>	<b>50.4</b>	<b>43.4</b>	<b>0.0</b>	<b>2.8</b>	<b>14.9</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



**West Virginia: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
WV Non-MSA	515	36,141	29.8	4,917	1.3	0.6	0.8	12.3	9.9	12.2	50.2	54.8	53.1	36.3	34.8	33.9	0.0	0.0	0.0
WV-Beckley MSA	171	20,847	9.9	1,785	0.0	0.0	0.0	4.3	2.3	3.7	84.7	80.1	82.0	11.0	17.5	14.3	0.0	0.0	0.0
WV-Charleston MSA	482	53,240	27.9	3,946	3.3	4.4	3.5	12.6	10.6	11.3	57.6	57.3	55.8	26.5	27.8	29.4	0.0	0.0	0.0
WV-Huntington MSA	196	22,156	11.3	2,680	12.6	11.2	12.7	9.6	6.6	7.7	40.4	42.9	42.5	36.7	39.3	36.6	0.8	0.0	0.5
WV-Morgantown MSA	197	13,403	11.4	2,574	0.2	1.0	0.2	22.0	19.8	21.4	43.2	37.1	43.2	34.5	42.1	35.3	0.0	0.0	0.0
WV-Parkersburg MSA	101	4,342	5.8	1,410	0.0	0.0	0.0	10.4	13.9	8.6	72.1	67.3	66.5	17.5	18.8	25.0	0.0	0.0	0.0
WV-Wheeling MSA	67	5,188	3.9	964	0.0	0.0	0.0	24.4	14.9	25.3	54.2	70.1	53.7	21.4	14.9	21.0	0.0	0.0	0.0
<b>Total</b>	<b>1,729</b>	<b>155,317</b>	<b>100.0</b>	<b>18,276</b>	<b>3.1</b>	<b>2.8</b>	<b>2.9</b>	<b>13.3</b>	<b>10.5</b>	<b>12.2</b>	<b>54.3</b>	<b>55.9</b>	<b>54.6</b>	<b>29.2</b>	<b>30.8</b>	<b>30.2</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

West Virginia: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
WV Non-MSA	515	36,141	29.8	4,917	81.5	76.5	47.1	4.7	21.9	13.8	1.6
WV-Beckley MSA	171	20,847	9.9	1,785	80.7	67.8	47.7	4.6	31.0	14.7	1.2
WV-Charleston MSA	482	53,240	27.9	3,946	80.1	72.6	47.5	5.1	25.1	14.8	2.3
WV-Huntington MSA	196	22,156	11.3	2,680	81.6	65.3	44.4	5.0	33.2	13.4	1.5
WV-Morgantown MSA	197	13,403	11.4	2,574	85.5	80.7	45.2	3.5	16.8	10.9	2.5
WV-Parkersburg MSA	101	4,342	5.8	1,410	81.3	70.3	37.0	4.5	19.8	14.2	9.9
WV-Wheeling MSA	67	5,188	3.9	964	81.0	68.7	47.7	5.6	29.9	13.4	1.5
<b>Total</b>	<b>1,729</b>	<b>155,317</b>	<b>100.0</b>	<b>18,276</b>	<b>81.6</b>	<b>73.1</b>	<b>45.8</b>	<b>4.7</b>	<b>24.6</b>	<b>13.7</b>	<b>2.3</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

West Virginia: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
WV Non-MSA	3	46	30.0	129	0.1	0.0	0.0	6.5	0.0	5.4	60.4	100.0	65.9	32.9	0.0	28.7	0.0	0.0	0.0
WV-Beckley MSA	3	309	30.0	30	0.0	0.0	0.0	3.4	66.7	6.7	88.2	33.3	86.7	8.3	0.0	6.7	0.0	0.0	0.0
WV-Charleston MSA	2	36	20.0	33	1.4	0.0	3.0	13.7	0.0	15.2	59.5	50.0	57.6	25.3	50.0	24.2	0.0	0.0	0.0
WV-Huntington MSA	0	0	0.0	36	5.1	0.0	0.0	8.3	0.0	19.4	47.2	0.0	52.8	39.5	0.0	27.8	0.0	0.0	0.0
WV-Morgantown MSA	0	0	0.0	45	0.0	0.0	0.0	22.8	0.0	24.4	53.0	0.0	75.6	24.3	0.0	0.0	0.0	0.0	0.0
WV-Parkersburg MSA	2	501	20.0	9	0.0	0.0	0.0	1.9	0.0	0.0	84.5	100.0	88.9	13.7	0.0	11.1	0.0	0.0	0.0
WV-Wheeling MSA	0	0	0.0	12	0.0	0.0	0.0	13.2	0.0	0.0	56.9	0.0	50.0	29.9	0.0	50.0	0.0	0.0	0.0
<b>Total</b>	<b>10</b>	<b>892</b>	<b>100.0</b>	<b>294</b>	<b>1.1</b>	<b>0.0</b>	<b>0.3</b>	<b>10.3</b>	<b>20.0</b>	<b>10.9</b>	<b>60.9</b>	<b>70.0</b>	<b>67.0</b>	<b>27.7</b>	<b>10.0</b>	<b>21.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

West Virginia: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
WV Non-MSA	3	46	30.0	129	98.6	66.7	55.0	0.6	33.3	0.9	0.0
WV-Beckley MSA	3	309	30.0	30	97.5	33.3	56.7	0.5	66.7	2.0	0.0
WV-Charleston MSA	2	36	20.0	33	96.6	100.0	60.6	1.4	0.0	1.9	0.0
WV-Huntington MSA	--		--	36	96.5	--	27.8	1.3	--	2.1	--
WV-Morgantown MSA	--		--	45	99.4	--	42.2	0.3	--	0.3	--
WV-Parkersburg MSA	2	501	20.0	9	98.8	100.0	55.6	0.6	0.0	0.6	0.0
WV-Wheeling MSA	--		--	12	95.8	--	50.0	1.8	--	2.4	--
<b>Total</b>	<b>10</b>	<b>892</b>	<b>100.0</b>	<b>294</b>	<b>97.7</b>	<b>70.0</b>	<b>50.3</b>	<b>0.9</b>	<b>30.0</b>	<b>1.4</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

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Kentucky: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KY Non-MSA	370	44,850	30.2	14,339	0.9	0.3	0.3	19.5	11.6	13.4	58.6	55.4	56.7	21.1	32.7	29.5	0.0	0.0	0.0
KY-Bowling Green MSA	268	52,162	21.9	8,653	1.9	0.7	1.9	18.6	12.3	13.9	42.3	31.3	35.4	37.0	55.6	48.5	0.3	0.0	0.3
KY-Clarksville MSA	46	5,136	3.8	2,859	4.8	4.3	2.3	8.4	10.9	6.0	64.8	63.0	68.2	22.0	21.7	23.5	0.0	0.0	0.0
KY-Lexington MSA	407	98,650	33.3	29,579	4.4	2.5	3.2	19.5	17.7	17.8	42.0	38.8	39.8	34.1	41.0	39.2	0.0	0.0	0.0
KY-Owensboro MSA	133	16,650	10.9	5,491	1.5	1.5	0.9	14.9	16.5	14.6	59.4	54.1	56.6	24.1	27.8	27.9	0.0	0.0	0.0
<b>Total</b>	<b>1,224</b>	<b>217,448</b>	<b>100.0</b>	<b>60,921</b>	<b>2.4</b>	<b>1.4</b>	<b>2.1</b>	<b>18.4</b>	<b>14.3</b>	<b>15.4</b>	<b>51.8</b>	<b>44.8</b>	<b>46.0</b>	<b>27.4</b>	<b>39.5</b>	<b>36.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kentucky: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KY Non-MSA	370	44,850	30.2	14,339	24.7	4.9	3.9	16.6	19.5	13.7	18.7	22.7	19.6	40.1	51.6	44.4	0.0	1.4	18.4
KY-Bowling Green MSA	268	52,162	21.9	8,653	21.5	11.9	6.3	17.4	25.0	17.1	20.0	21.3	20.7	41.1	38.4	36.2	0.0	3.4	19.7
KY-Clarksville MSA	46	5,136	3.8	2,859	24.6	8.7	5.6	20.1	23.9	16.0	20.9	21.7	21.5	34.5	41.3	32.3	0.0	4.3	24.6
KY-Lexington MSA	407	98,650	33.3	29,579	23.5	8.1	7.0	16.3	26.8	18.4	19.2	17.0	20.2	41.1	46.4	37.3	0.0	1.7	17.1
KY-Owensboro MSA	133	16,650	10.9	5,491	22.2	12.8	7.4	17.8	19.5	19.2	19.8	21.1	22.8	40.2	44.4	34.5	0.0	2.3	16.2
<b>Total</b>	<b>1,224</b>	<b>217,448</b>	<b>100.0</b>	<b>60,921</b>	<b>23.7</b>	<b>8.5</b>	<b>6.1</b>	<b>16.9</b>	<b>23.3</b>	<b>17.1</b>	<b>19.3</b>	<b>20.3</b>	<b>20.4</b>	<b>40.2</b>	<b>45.8</b>	<b>38.3</b>	<b>0.0</b>	<b>2.1</b>	<b>18.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

**Kentucky: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KY Non-MSA	500	40,492	31.4	8,181	0.7	0.8	0.8	16.8	13.8	15.0	58.9	64.8	60.6	23.6	20.6	23.7	0.0	0.0	0.0
KY-Bowling Green MSA	539	51,202	33.8	3,596	5.2	3.2	4.5	20.3	26.9	19.7	35.1	22.8	33.3	35.8	46.0	40.0	3.7	1.1	2.4
KY-Clarksville MSA	61	3,688	3.8	895	11.4	4.9	13.0	19.4	24.6	13.9	50.1	37.7	55.1	17.1	32.8	17.7	2.0	0.0	0.4
KY-Lexington MSA	300	19,116	18.8	13,421	5.9	2.3	5.3	19.4	20.0	19.1	42.6	39.3	44.0	32.1	38.3	31.6	0.0	0.0	0.0
KY-Owensboro MSA	194	15,095	12.2	2,414	2.5	4.6	2.8	25.4	26.8	21.0	47.7	42.3	49.7	24.4	26.3	26.4	0.0	0.0	0.0
<b>Total</b>	<b>1,594</b>	<b>129,593</b>	<b>100.0</b>	<b>28,507</b>	<b>4.1</b>	<b>2.5</b>	<b>4.0</b>	<b>19.1</b>	<b>21.4</b>	<b>18.0</b>	<b>47.7</b>	<b>42.0</b>	<b>48.2</b>	<b>28.6</b>	<b>33.7</b>	<b>29.5</b>	<b>0.5</b>	<b>0.4</b>	<b>0.3</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kentucky: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA	500	40,492	31.4	8,181	83.3	77.8	47.5	4.2	20.4	12.5	1.8
KY-Bowling Green MSA	539	51,202	33.8	3,596	86.1	65.3	53.0	3.6	30.2	10.2	4.5
KY-Clarksville MSA	61	3,688	3.8	895	83.4	77.0	51.4	3.4	19.7	13.2	3.3
KY-Lexington MSA	300	19,116	18.8	13,421	87.6	70.3	51.2	3.6	24.0	8.8	5.7
KY-Owensboro MSA	194	15,095	12.2	2,414	83.4	70.6	56.4	4.6	26.8	12.0	2.6
<b>Total</b>	<b>1,594</b>	<b>129,593</b>	<b>100.0</b>	<b>28,507</b>	<b>85.5</b>	<b>71.3</b>	<b>50.8</b>	<b>3.8</b>	<b>25.2</b>	<b>10.6</b>	<b>3.6</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



<b>Kentucky: Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
KY Non-MSA	38	4,811	34.5	433	0.2	0.0	0.2	10.2	0.0	6.0	62.8	68.4	71.6	26.7	31.6	22.2	0.0	0.0	0.0
KY-Bowling Green MSA	13	1,592	11.8	236	1.2	0.0	0.0	15.1	23.1	19.9	42.6	23.1	49.2	39.8	53.8	30.9	1.3	0.0	0.0
KY-Clarksville MSA	10	1,134	9.1	125	4.3	0.0	4.8	3.4	0.0	4.0	59.4	60.0	62.4	32.7	40.0	28.8	0.2	0.0	0.0
KY-Lexington MSA	4	548	3.6	554	3.6	0.0	1.3	13.1	0.0	13.2	47.3	100.0	53.8	36.1	0.0	31.8	0.0	0.0	0.0
KY-Owensboro MSA	45	6,555	40.9	619	0.2	0.0	0.0	8.3	4.4	1.3	64.1	64.4	72.5	27.4	31.1	26.2	0.0	0.0	0.0
<b>Total</b>	<b>110</b>	<b>14,640</b>	<b>100.0</b>	<b>1,967</b>	<b>2.0</b>	<b>0.0</b>	<b>0.7</b>	<b>11.3</b>	<b>4.5</b>	<b>8.1</b>	<b>54.0</b>	<b>61.8</b>	<b>63.6</b>	<b>32.5</b>	<b>33.6</b>	<b>27.6</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kentucky: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues										2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA	38	4,811	34.5	433	98.3	86.8	47.1	0.7	13.2	1.1	0.0
KY-Bowling Green MSA	13	1,592	11.8	236	98.1	61.5	38.6	0.4	38.5	1.5	0.0
KY-Clarksville MSA	10	1,134	9.1	125	98.0	80.0	48.0	0.9	20.0	1.1	0.0
KY-Lexington MSA	4	548	3.6	554	95.9	75.0	62.5	2.5	25.0	1.6	0.0
KY-Owensboro MSA	45	6,555	40.9	619	98.7	82.2	74.0	1.0	17.8	0.3	0.0
<b>Total</b>	<b>110</b>	<b>14,640</b>	<b>100.0</b>	<b>1,967</b>	<b>97.3</b>	<b>80.9</b>	<b>58.9</b>	<b>1.4</b>	<b>19.1</b>	<b>1.3</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Washington DC-MD-VA-WV MMSA	15,973	6,599,323	100.0	374,055	4.0	4.8	4.0	18.4	19.7	16.3	38.4	32.5	38.3	39.0	42.9	41.2	0.2	0.2	0.2	
<b>Total</b>	<b>15,973</b>	<b>6,599,323</b>	<b>100.0</b>	<b>374,055</b>	<b>4.0</b>	<b>4.8</b>	<b>4.0</b>	<b>18.4</b>	<b>19.7</b>	<b>16.3</b>	<b>38.4</b>	<b>32.5</b>	<b>38.3</b>	<b>39.0</b>	<b>42.9</b>	<b>41.2</b>	<b>0.2</b>	<b>0.2</b>	<b>0.2</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Washington DC-MD-VA-WV MMSA	15,973	6,599,323	100.0	374,055	22.4	10.1	7.0	16.8	27.4	16.8	20.2	20.3	20.7	40.6	40.9	32.1	0.0	1.3	23.4	
<b>Total</b>	<b>15,973</b>	<b>6,599,323</b>	<b>100.0</b>	<b>374,055</b>	<b>22.4</b>	<b>10.1</b>	<b>7.0</b>	<b>16.8</b>	<b>27.4</b>	<b>16.8</b>	<b>20.2</b>	<b>20.3</b>	<b>20.7</b>	<b>40.6</b>	<b>40.9</b>	<b>32.1</b>	<b>0.0</b>	<b>1.3</b>	<b>23.4</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Washington DC-MD-VA-WV MMSA	10,963	637,858	100.0	150,547	5.2	4.3	5.3	19.4	21.5	19.1	36.1	36.5	36.0	38.8	37.4	39.2	0.6	0.3	0.4	
<b>Total</b>	<b>10,963</b>	<b>637,858</b>	<b>100.0</b>	<b>150,547</b>	<b>5.2</b>	<b>4.3</b>	<b>5.3</b>	<b>19.4</b>	<b>21.5</b>	<b>19.1</b>	<b>36.1</b>	<b>36.5</b>	<b>36.0</b>	<b>38.8</b>	<b>37.4</b>	<b>39.2</b>	<b>0.6</b>	<b>0.3</b>	<b>0.4</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Washington DC-MD-VA-WV MMSA	10,963	637,858	100.0	150,547	89.3	73.3	47.8	3.7	23.2	7.0	3.5		
<b>Total</b>	<b>10,963</b>	<b>637,858</b>	<b>100.0</b>	<b>150,547</b>	<b>89.3</b>	<b>73.3</b>	<b>47.8</b>	<b>3.7</b>	<b>23.2</b>	<b>7.0</b>	<b>3.5</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington DC -MD-VA-WV MMSA	25	1,316	100.0	597	4.1	8.0	4.2	22.6	32.0	26.0	40.4	20.0	39.0	32.7	40.0	30.8	0.2	0.0	0.0
<b>Total</b>	<b>25</b>	<b>1,316</b>	<b>100.0</b>	<b>597</b>	<b>4.1</b>	<b>8.0</b>	<b>4.2</b>	<b>22.6</b>	<b>32.0</b>	<b>26.0</b>	<b>40.4</b>	<b>20.0</b>	<b>39.0</b>	<b>32.7</b>	<b>40.0</b>	<b>30.8</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Washington DC Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Washington DC-MD-VA-WV MMSA	25	1,316	100.0	597	96.4	80.0	52.4	2.0	16.0	1.6	4.0	
<b>Total</b>	<b>25</b>	<b>1,316</b>	<b>100.0</b>	<b>597</b>	<b>96.4</b>	<b>80.0</b>	<b>52.4</b>	<b>2.0</b>	<b>16.0</b>	<b>1.6</b>	<b>4.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Charlotte NC-SC MMSA	6,415	1,836,716	100.0	185,504	3.1	2.3	2.4	22.3	16.7	16.1	37.1	29.8	32.9	37.5	51.2	48.6	0.0	0.0	0.0		
<b>Total</b>	<b>6,415</b>	<b>1,836,716</b>	<b>100.0</b>	<b>185,504</b>	<b>3.1</b>	<b>2.3</b>	<b>2.4</b>	<b>22.3</b>	<b>16.7</b>	<b>16.1</b>	<b>37.1</b>	<b>29.8</b>	<b>32.9</b>	<b>37.5</b>	<b>51.2</b>	<b>48.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Charlotte NC-SC MMSA	6,415	1,836,716	100.0	185,504	22.8	5.6	4.9	17.2	17.2	14.6	18.8	17.9	19.3	41.3	56.6	45.4	0.0	2.7	15.8		
<b>Total</b>	<b>6,415</b>	<b>1,836,716</b>	<b>100.0</b>	<b>185,504</b>	<b>22.8</b>	<b>5.6</b>	<b>4.9</b>	<b>17.2</b>	<b>17.2</b>	<b>14.6</b>	<b>18.8</b>	<b>17.9</b>	<b>19.3</b>	<b>41.3</b>	<b>56.6</b>	<b>45.4</b>	<b>0.0</b>	<b>2.7</b>	<b>15.8</b>		

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charlotte NC-SC MMSA	6,425	430,697	100.0	84,916	6.5	7.0	6.3	20.1	21.5	19.3	28.9	31.5	29.9	43.9	39.5	44.1	0.6	0.5	0.4
<b>Total</b>	<b>6,425</b>	<b>430,697</b>	<b>100.0</b>	<b>84,916</b>	<b>6.5</b>	<b>7.0</b>	<b>6.3</b>	<b>20.1</b>	<b>21.5</b>	<b>19.3</b>	<b>28.9</b>	<b>31.5</b>	<b>29.9</b>	<b>43.9</b>	<b>39.5</b>	<b>44.1</b>	<b>0.6</b>	<b>0.5</b>	<b>0.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Charlotte NC-SC MMSA	6,425	430,697	100.0	84,916	88.6	70.4	47.4	3.4	26.3	8.0	3.3		
<b>Total</b>	<b>6,425</b>	<b>430,697</b>	<b>100.0</b>	<b>84,916</b>	<b>88.6</b>	<b>70.4</b>	<b>47.4</b>	<b>3.4</b>	<b>26.3</b>	<b>8.0</b>	<b>3.3</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte NC-SC MMSA	27	2,418	100.0	537	3.9	0.0	0.9	21.2	22.2	26.4	43.3	44.4	54.7	31.4	33.3	17.9	0.2	0.0	0.0
<b>Total</b>	<b>27</b>	<b>2,418</b>	<b>100.0</b>	<b>537</b>	<b>3.9</b>	<b>0.0</b>	<b>0.9</b>	<b>21.2</b>	<b>22.2</b>	<b>26.4</b>	<b>43.3</b>	<b>44.4</b>	<b>54.7</b>	<b>31.4</b>	<b>33.3</b>	<b>17.9</b>	<b>0.2</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Charlotte Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Charlotte NC-SC MMSA	27	2,418	100.0	537	96.6	81.5	47.7	2.0	18.5	1.4	0.0	
<b>Total</b>	<b>27</b>	<b>2,418</b>	<b>100.0</b>	<b>537</b>	<b>96.6</b>	<b>81.5</b>	<b>47.7</b>	<b>2.0</b>	<b>18.5</b>	<b>1.4</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Myrtle Beach Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Myrtle Beach NC-SC MMSA	1,948	486,876	100.0	46,555	0.4	0.2	0.4	16.1	10.9	11.1	64.9	58.6	63.9	18.4	30.3	24.6	0.2	0.1	0.1
<b>Total</b>	<b>1,948</b>	<b>486,876</b>	<b>100.0</b>	<b>46,555</b>	<b>0.4</b>	<b>0.2</b>	<b>0.4</b>	<b>16.1</b>	<b>10.9</b>	<b>11.1</b>	<b>64.9</b>	<b>58.6</b>	<b>63.9</b>	<b>18.4</b>	<b>30.3</b>	<b>24.6</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Myrtle Beach Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Myrtle Beach NC-SC MMSA	1,948	486,876	100.0	46,555	20.1	5.2	4.3	18.4	15.3	14.1	21.3	20.6	18.8	40.3	57.3	46.3	0.0	1.6	16.4
<b>Total</b>	<b>1,948</b>	<b>486,876</b>	<b>100.0</b>	<b>46,555</b>	<b>20.1</b>	<b>5.2</b>	<b>4.3</b>	<b>18.4</b>	<b>15.3</b>	<b>14.1</b>	<b>21.3</b>	<b>20.6</b>	<b>18.8</b>	<b>40.3</b>	<b>57.3</b>	<b>46.3</b>	<b>0.0</b>	<b>1.6</b>	<b>16.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Myrtle Beach Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Myrtle Beach NC-SC MMSA	1,367	49,666	100.0	15,353	3.7	1.2	4.1	15.8	18.4	14.5	57.6	55.8	60.9	22.4	24.1	20.1	0.5	0.4	0.4	
<b>Total</b>	<b>1,367</b>	<b>49,666</b>	<b>100.0</b>	<b>15,353</b>	<b>3.7</b>	<b>1.2</b>	<b>4.1</b>	<b>15.8</b>	<b>18.4</b>	<b>14.5</b>	<b>57.6</b>	<b>55.8</b>	<b>60.9</b>	<b>22.4</b>	<b>24.1</b>	<b>20.1</b>	<b>0.5</b>	<b>0.4</b>	<b>0.4</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Myrtle Beach Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Myrtle Beach NC-SC MMSA	1,367	49,666	100.0	15,353	87.4	75.1	47.1	3.4	16.7	9.2	8.3		
<b>Total</b>	<b>1,367</b>	<b>49,666</b>	<b>100.0</b>	<b>15,353</b>	<b>87.4</b>	<b>75.1</b>	<b>47.1</b>	<b>3.4</b>	<b>16.7</b>	<b>9.2</b>	<b>8.3</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Myrtle Beach Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Myrtle Beach NC-SC MMSA	1	100	100.0	127	0.9	0.0	1.6	24.1	0.0	25.2	60.4	100.0	66.9	14.0	0.0	3.9	0.5	0.0	2.4
<b>Total</b>	<b>1</b>	<b>100</b>	<b>100.0</b>	<b>127</b>	<b>0.9</b>	<b>0.0</b>	<b>1.6</b>	<b>24.1</b>	<b>0.0</b>	<b>25.2</b>	<b>60.4</b>	<b>100.0</b>	<b>66.9</b>	<b>14.0</b>	<b>0.0</b>	<b>3.9</b>	<b>0.5</b>	<b>0.0</b>	<b>2.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Myrtle Beach Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Myrtle Beach NC-SC MMSA	1	100	100.0	127	97.8	0.0	55.1	1.4	100.0	0.9	0.0		
<b>Total</b>	<b>1</b>	<b>100</b>	<b>100.0</b>	<b>127</b>	<b>97.8</b>	<b>0.0</b>	<b>55.1</b>	<b>1.4</b>	<b>100.0</b>	<b>0.9</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Louisville KY-IN MMSA	943	199,799	100.0	75,156	4.0	2.7	2.6	14.7	9.9	12.0	46.5	35.4	44.0	34.8	52.1	41.3	0.1	0.0	0.1
<b>Total</b>	<b>943</b>	<b>199,799</b>	<b>100.0</b>	<b>75,156</b>	<b>4.0</b>	<b>2.7</b>	<b>2.6</b>	<b>14.7</b>	<b>9.9</b>	<b>12.0</b>	<b>46.5</b>	<b>35.4</b>	<b>44.0</b>	<b>34.8</b>	<b>52.1</b>	<b>41.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Louisville KY-IN MMSA	943	199,799	100.0	75,156	21.0	7.8	8.7	17.5	25.2	20.6	20.4	20.5	20.6	41.0	45.1	32.5	0.0	1.4	17.6
<b>Total</b>	<b>943</b>	<b>199,799</b>	<b>100.0</b>	<b>75,156</b>	<b>21.0</b>	<b>7.8</b>	<b>8.7</b>	<b>17.5</b>	<b>25.2</b>	<b>20.6</b>	<b>20.4</b>	<b>20.5</b>	<b>20.6</b>	<b>41.0</b>	<b>45.1</b>	<b>32.5</b>	<b>0.0</b>	<b>1.4</b>	<b>17.6</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Louisville KY-IN MMSA	983	54,668	100.0	26,771	7.2	4.6	6.6	15.4	16.0	14.2	36.3	37.7	34.9	38.1	39.4	41.3	3.0	2.3	3.1	
<b>Total</b>	<b>983</b>	<b>54,668</b>	<b>100.0</b>	<b>26,771</b>	<b>7.2</b>	<b>4.6</b>	<b>6.6</b>	<b>15.4</b>	<b>16.0</b>	<b>14.2</b>	<b>36.3</b>	<b>37.7</b>	<b>34.9</b>	<b>38.1</b>	<b>39.4</b>	<b>41.3</b>	<b>3.0</b>	<b>2.3</b>	<b>3.1</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Louisville KY-IN MMSA	983	54,668	100.0	26,771	88.0	72.8	46.5	3.8	21.7	8.2	5.5		
<b>Total</b>	<b>983</b>	<b>54,668</b>	<b>100.0</b>	<b>26,771</b>	<b>88.0</b>	<b>72.8</b>	<b>46.5</b>	<b>3.8</b>	<b>21.7</b>	<b>8.2</b>	<b>5.5</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Louisville KY -IN MMSA	0	0	0.0	381	3.1	0.0	0.5	11.6	0.0	8.7	49.1	0.0	60.1	35.5	0.0	30.7	0.6	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>381</b>	<b>3.1</b>	<b>0.0</b>	<b>0.5</b>	<b>11.6</b>	<b>0.0</b>	<b>8.7</b>	<b>49.1</b>	<b>0.0</b>	<b>60.1</b>	<b>35.5</b>	<b>0.0</b>	<b>30.7</b>	<b>0.6</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Louisville Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Louisville KY-IN MMSA	--		--	381	98.0	--	42.8	1.1	--	0.9	--		
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>381</b>	<b>98.0</b>	<b>--</b>	<b>42.8</b>	<b>1.1</b>	<b>--</b>	<b>0.9</b>	<b>--</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

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Chattanooga Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Chattanooga TN-GA MMSA	1,021	177,233	100.0	30,572	2.6	1.9	2.4	18.6	9.6	13.6	44.7	37.7	42.2	34.1	50.8	41.8	0.0	0.0	0.0	
<b>Total</b>	<b>1,021</b>	<b>177,233</b>	<b>100.0</b>	<b>30,572</b>	<b>2.6</b>	<b>1.9</b>	<b>2.4</b>	<b>18.6</b>	<b>9.6</b>	<b>13.6</b>	<b>44.7</b>	<b>37.7</b>	<b>42.2</b>	<b>34.1</b>	<b>50.8</b>	<b>41.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Chattanooga Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2021		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Chattanooga TN-GA MMSA	1,021	177,233	100.0	30,572	21.3	7.5	5.8	17.5	22.5	17.7	20.3	21.0	19.6	40.8	47.6	36.5	0.0	1.4	20.4	
<b>Total</b>	<b>1,021</b>	<b>177,233</b>	<b>100.0</b>	<b>30,572</b>	<b>21.3</b>	<b>7.5</b>	<b>5.8</b>	<b>17.5</b>	<b>22.5</b>	<b>17.7</b>	<b>20.3</b>	<b>21.0</b>	<b>19.6</b>	<b>40.8</b>	<b>47.6</b>	<b>36.5</b>	<b>0.0</b>	<b>1.4</b>	<b>20.4</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Chattanooga Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chattanooga TN-GA MMSA	938	30,269	100.0	12,158	6.2	5.8	7.6	17.2	14.4	15.9	41.2	37.7	39.9	35.2	42.1	36.5	0.2	0.0	0.1
<b>Total</b>	<b>938</b>	<b>30,269</b>	<b>100.0</b>	<b>12,158</b>	<b>6.2</b>	<b>5.8</b>	<b>7.6</b>	<b>17.2</b>	<b>14.4</b>	<b>15.9</b>	<b>41.2</b>	<b>37.7</b>	<b>39.9</b>	<b>35.2</b>	<b>42.1</b>	<b>36.5</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Chattanooga Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Chattanooga TN-GA MMSA	938	30,269	100.0	12,158	86.7	70.7	46.1	3.9	20.6	9.4	8.7		
<b>Total</b>	<b>938</b>	<b>30,269</b>	<b>100.0</b>	<b>12,158</b>	<b>86.7</b>	<b>70.7</b>	<b>46.1</b>	<b>3.9</b>	<b>20.6</b>	<b>9.4</b>	<b>8.7</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Chattanooga Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chattanooga TN-GA MMSA	3	230	100.0	97	3.5	0.0	3.1	16.2	0.0	14.4	46.7	100.0	57.7	33.7	0.0	24.7	0.0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>230</b>	<b>100.0</b>	<b>97</b>	<b>3.5</b>	<b>0.0</b>	<b>3.1</b>	<b>16.2</b>	<b>0.0</b>	<b>14.4</b>	<b>46.7</b>	<b>100.0</b>	<b>57.7</b>	<b>33.7</b>	<b>0.0</b>	<b>24.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Chattanooga Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Chattanooga TN-GA MMSA	3	230	100.0	97	97.1	0.0	54.6	1.1	100.0	1.8	0.0	
<b>Total</b>	<b>3</b>	<b>230</b>	<b>100.0</b>	<b>97</b>	<b>97.1</b>	<b>0.0</b>	<b>54.6</b>	<b>1.1</b>	<b>100.0</b>	<b>1.8</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Cincinnati Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Cincinnati OH-KY MMSA	946	252,958	100.0	129,425	3.9	3.9	3.3	17.0	15.1	14.3	41.8	39.2	40.5	37.1	41.8	41.8	0.1	0.0	0.1
<b>Total</b>	<b>946</b>	<b>252,958</b>	<b>100.0</b>	<b>129,425</b>	<b>3.9</b>	<b>3.9</b>	<b>3.3</b>	<b>17.0</b>	<b>15.1</b>	<b>14.3</b>	<b>41.8</b>	<b>39.2</b>	<b>40.5</b>	<b>37.1</b>	<b>41.8</b>	<b>41.8</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

<b>Cincinnati Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Cincinnati OH-KY MMSA	946	252,958	100.0	129,425	22.3	9.8	7.8	16.7	26.6	19.0	19.9	19.2	20.9	41.1	42.6	36.6	0.0	1.7	15.6
<b>Total</b>	<b>946</b>	<b>252,958</b>	<b>100.0</b>	<b>129,425</b>	<b>22.3</b>	<b>9.8</b>	<b>7.8</b>	<b>16.7</b>	<b>26.6</b>	<b>19.0</b>	<b>19.9</b>	<b>19.2</b>	<b>20.9</b>	<b>41.1</b>	<b>42.6</b>	<b>36.6</b>	<b>0.0</b>	<b>1.7</b>	<b>15.6</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

<b>Cincinnati Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																		<b>2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Cincinnati OH-KY MMSA	839	65,222	100.0	46,088	6.8	4.6	7.2	19.3	21.0	18.5	35.7	45.3	34.6	37.2	28.5	39.0	1.0	0.6	0.7	
<b>Total</b>	<b>839</b>	<b>65,222</b>	<b>100.0</b>	<b>46,088</b>	<b>6.8</b>	<b>4.6</b>	<b>7.2</b>	<b>19.3</b>	<b>21.0</b>	<b>18.5</b>	<b>35.7</b>	<b>45.3</b>	<b>34.6</b>	<b>37.2</b>	<b>28.5</b>	<b>39.0</b>	<b>1.0</b>	<b>0.6</b>	<b>0.7</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Cincinnati Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Cincinnati OH-KY MMSA	839	65,222	100.0	46,088	83.0	69.5	49.5	5.4	26.2	11.6	4.3		
<b>Total</b>	<b>839</b>	<b>65,222</b>	<b>100.0</b>	<b>46,088</b>	<b>83.0</b>	<b>69.5</b>	<b>49.5</b>	<b>5.4</b>	<b>26.2</b>	<b>11.6</b>	<b>4.3</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Cincinnati Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Cincinnati OH-KY MMSA	8	82	100.0	495	3.4	0.0	1.8	17.9	25.0	26.1	46.6	50.0	53.5	31.9	25.0	18.2	0.2	0.0	0.4
<b>Total</b>	<b>8</b>	<b>82</b>	<b>100.0</b>	<b>495</b>	<b>3.4</b>	<b>0.0</b>	<b>1.8</b>	<b>17.9</b>	<b>25.0</b>	<b>26.1</b>	<b>46.6</b>	<b>50.0</b>	<b>53.5</b>	<b>31.9</b>	<b>25.0</b>	<b>18.2</b>	<b>0.2</b>	<b>0.0</b>	<b>0.4</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

<b>Cincinnati Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>	
Cincinnati OH-KY MMSA	8	82	100.0	495	96.5	100.0	60.4	1.6	0.0	1.9	0.0	
<b>Total</b>	<b>8</b>	<b>82</b>	<b>100.0</b>	<b>495</b>	<b>96.5</b>	<b>100.0</b>	<b>60.4</b>	<b>1.6</b>	<b>0.0</b>	<b>1.9</b>	<b>0.0</b>	

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

<b>Memphis Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Memphis TN-MS-AR MMSA	972	351,736	100.0	60,731	10.2	2.9	3.7	17.3	8.2	9.6	26.9	16.0	24.5	45.5	72.8	62.1	0.1	0.0	0.0
<b>Total</b>	<b>972</b>	<b>351,736</b>	<b>100.0</b>	<b>60,731</b>	<b>10.2</b>	<b>2.9</b>	<b>3.7</b>	<b>17.3</b>	<b>8.2</b>	<b>9.6</b>	<b>26.9</b>	<b>16.0</b>	<b>24.5</b>	<b>45.5</b>	<b>72.8</b>	<b>62.1</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Memphis Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Memphis TN-MS-AR MMSA	972	351,736	100.0	60,731	24.6	4.6	3.5	15.8	14.0	11.8	17.5	20.0	18.0	42.1	59.6	42.3	0.0	1.9	24.4
<b>Total</b>	<b>972</b>	<b>351,736</b>	<b>100.0</b>	<b>60,731</b>	<b>24.6</b>	<b>4.6</b>	<b>3.5</b>	<b>15.8</b>	<b>14.0</b>	<b>11.8</b>	<b>17.5</b>	<b>20.0</b>	<b>18.0</b>	<b>42.1</b>	<b>59.6</b>	<b>42.3</b>	<b>0.0</b>	<b>1.9</b>	<b>24.4</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Memphis Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																		<b>2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Memphis TN-MS-AR MMSA	903	32,635	100.0	30,429	12.3	13.1	11.4	16.8	14.4	16.0	23.0	22.7	23.3	47.1	49.6	48.5	0.9	0.2	0.9
<b>Total</b>	<b>903</b>	<b>32,635</b>	<b>100.0</b>	<b>30,429</b>	<b>12.3</b>	<b>13.1</b>	<b>11.4</b>	<b>16.8</b>	<b>14.4</b>	<b>16.0</b>	<b>23.0</b>	<b>22.7</b>	<b>23.3</b>	<b>47.1</b>	<b>49.6</b>	<b>48.5</b>	<b>0.9</b>	<b>0.2</b>	<b>0.9</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Memphis Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
Memphis TN-MS-AR MMSA	903	32,635	100.0	30,429	86.0	81.7	39.1	4.2	16.6	9.8	1.7		
<b>Total</b>	<b>903</b>	<b>32,635</b>	<b>100.0</b>	<b>30,429</b>	<b>86.0</b>	<b>81.7</b>	<b>39.1</b>	<b>4.2</b>	<b>16.6</b>	<b>9.8</b>	<b>1.7</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Memphis Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis TN-MS-AR MMSA	0	0	0.0	382	6.4	0.0	3.1	16.6	0.0	14.9	31.1	0.0	53.7	45.2	0.0	28.0	0.6	0.0	0.3
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>382</b>	<b>6.4</b>	<b>0.0</b>	<b>3.1</b>	<b>16.6</b>	<b>0.0</b>	<b>14.9</b>	<b>31.1</b>	<b>0.0</b>	<b>53.7</b>	<b>45.2</b>	<b>0.0</b>	<b>28.0</b>	<b>0.6</b>	<b>0.0</b>	<b>0.3</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Memphis Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Memphis TN-MS-AR MMSA	--		--	382	95.1	--	31.4	3.1	--	1.8	--		
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>382</b>	<b>95.1</b>	<b>--</b>	<b>31.4</b>	<b>3.1</b>	<b>--</b>	<b>1.8</b>	<b>--</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

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<b>Hagerstown Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Hagerstown WV-MD MMSA	578	106,846	100.0	19,376	0.8	0.0	0.8	12.8	12.1	10.8	64.5	62.5	65.8	21.9	25.4	22.6	0.0	0.0	0.0
<b>Total</b>	<b>578</b>	<b>106,846</b>	<b>100.0</b>	<b>19,376</b>	<b>0.8</b>	<b>0.0</b>	<b>0.8</b>	<b>12.8</b>	<b>12.1</b>	<b>10.8</b>	<b>64.5</b>	<b>62.5</b>	<b>65.8</b>	<b>21.9</b>	<b>25.4</b>	<b>22.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Hagerstown Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Hagerstown WV-MD MMSA	578	106,846	100.0	19,376	20.8	9.0	5.6	17.2	23.5	16.6	22.0	23.4	21.7	40.0	42.6	31.6	0.0	1.6	24.5
<b>Total</b>	<b>578</b>	<b>106,846</b>	<b>100.0</b>	<b>19,376</b>	<b>20.8</b>	<b>9.0</b>	<b>5.6</b>	<b>17.2</b>	<b>23.5</b>	<b>16.6</b>	<b>22.0</b>	<b>23.4</b>	<b>21.7</b>	<b>40.0</b>	<b>42.6</b>	<b>31.6</b>	<b>0.0</b>	<b>1.6</b>	<b>24.5</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



<b>Hagerstown Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																	<b>2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hagerstown WV-MD MMSA	488	20,863	100.0	5,672	4.8	1.6	3.7	18.7	20.3	16.0	56.5	56.8	58.8	19.8	21.3	21.5	0.1	0.0	0.0
<b>Total</b>	<b>488</b>	<b>20,863</b>	<b>100.0</b>	<b>5,672</b>	<b>4.8</b>	<b>1.6</b>	<b>3.7</b>	<b>18.7</b>	<b>20.3</b>	<b>16.0</b>	<b>56.5</b>	<b>56.8</b>	<b>58.8</b>	<b>19.8</b>	<b>21.3</b>	<b>21.5</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Hagerstown Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Hagerstown WV-MD MMSA	488	20,863	100.0	5,672	86.3	81.4	42.6	3.5	15.4	10.2	3.3	
<b>Total</b>	<b>488</b>	<b>20,863</b>	<b>100.0</b>	<b>5,672</b>	<b>86.3</b>	<b>81.4</b>	<b>42.6</b>	<b>3.5</b>	<b>15.4</b>	<b>10.2</b>	<b>3.3</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Hagerstown Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																		<b>2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Hagerstown WV-MD MMSA	2	65	100.0	84	1.0	0.0	0.0	7.0	0.0	3.6	60.8	50.0	61.9	31.3	50.0	34.5	0.0	0.0	0.0
<b>Total</b>	<b>2</b>	<b>65</b>	<b>100.0</b>	<b>84</b>	<b>1.0</b>	<b>0.0</b>	<b>0.0</b>	<b>7.0</b>	<b>0.0</b>	<b>3.6</b>	<b>60.8</b>	<b>50.0</b>	<b>61.9</b>	<b>31.3</b>	<b>50.0</b>	<b>34.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

<b>Hagerstown Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>		
Hagerstown WV-MD MMSA	2	65	100.0	84	98.1	100.0	50.0	1.5	0.0	0.4	0.0		
<b>Total</b>	<b>2</b>	<b>65</b>	<b>100.0</b>	<b>84</b>	<b>98.1</b>	<b>100.0</b>	<b>50.0</b>	<b>1.5</b>	<b>0.0</b>	<b>0.4</b>	<b>0.0</b>		

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.*

Columbus Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Columbus GA-AL MMSA	206	42,258	100.0	12,616	3.6	1.9	1.4	25.4	11.2	13.8	31.6	30.1	26.5	39.5	56.8	58.3	0.0	0.0	0.0	
<b>Total</b>	<b>206</b>	<b>42,258</b>	<b>100.0</b>	<b>12,616</b>	<b>3.6</b>	<b>1.9</b>	<b>1.4</b>	<b>25.4</b>	<b>11.2</b>	<b>13.8</b>	<b>31.6</b>	<b>30.1</b>	<b>26.5</b>	<b>39.5</b>	<b>56.8</b>	<b>58.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Columbus Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Columbus GA-AL MMSA	206	42,258	100.0	12,616	22.7	3.9	3.3	17.9	15.5	11.0	18.2	19.9	17.4	41.2	50.5	35.0	0.0	10.2	33.3	
<b>Total</b>	<b>206</b>	<b>42,258</b>	<b>100.0</b>	<b>12,616</b>	<b>22.7</b>	<b>3.9</b>	<b>3.3</b>	<b>17.9</b>	<b>15.5</b>	<b>11.0</b>	<b>18.2</b>	<b>19.9</b>	<b>17.4</b>	<b>41.2</b>	<b>50.5</b>	<b>35.0</b>	<b>0.0</b>	<b>10.2</b>	<b>33.3</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Columbus Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbus GA-AL MMSA	465	18,310	100.0	6,095	7.7	4.3	6.5	21.6	20.0	21.3	34.7	30.5	34.4	35.6	45.2	37.8	0.3	0.0	0.1
<b>Total</b>	<b>465</b>	<b>18,310</b>	<b>100.0</b>	<b>6,095</b>	<b>7.7</b>	<b>4.3</b>	<b>6.5</b>	<b>21.6</b>	<b>20.0</b>	<b>21.3</b>	<b>34.7</b>	<b>30.5</b>	<b>34.4</b>	<b>35.6</b>	<b>45.2</b>	<b>37.8</b>	<b>0.3</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Columbus Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Columbus GA-AL MMSA	465	18,310	100.0	6,095	88.1	83.4	43.9	3.0	14.8	9.0	1.7		
<b>Total</b>	<b>465</b>	<b>18,310</b>	<b>100.0</b>	<b>6,095</b>	<b>88.1</b>	<b>83.4</b>	<b>43.9</b>	<b>3.0</b>	<b>14.8</b>	<b>9.0</b>	<b>1.7</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Columbus Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbus GA-AL MMSA	2	413	100.0	60	3.8	0.0	3.3	20.8	50.0	28.3	35.8	0.0	46.7	39.3	50.0	21.7	0.3	0.0	0.0
<b>Total</b>	<b>2</b>	<b>413</b>	<b>100.0</b>	<b>60</b>	<b>3.8</b>	<b>0.0</b>	<b>3.3</b>	<b>20.8</b>	<b>50.0</b>	<b>28.3</b>	<b>35.8</b>	<b>0.0</b>	<b>46.7</b>	<b>39.3</b>	<b>50.0</b>	<b>21.7</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Columbus Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Columbus GA-AL MMSA	2	413	100.0	60	96.8	100.0	46.7	1.5	0.0	1.7	0.0	
<b>Total</b>	<b>2</b>	<b>413</b>	<b>100.0</b>	<b>60</b>	<b>96.8</b>	<b>100.0</b>	<b>46.7</b>	<b>1.5</b>	<b>0.0</b>	<b>1.7</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Kingsport Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2021</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kingsport TN-VA MMSA	207	29,820	100.0	11,491	0.0	0.0	0.0	14.2	14.0	14.8	63.1	53.6	55.6	22.6	32.4	29.6	0.0	0.0	0.0
<b>Total</b>	<b>207</b>	<b>29,820</b>	<b>100.0</b>	<b>11,491</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>14.2</b>	<b>14.0</b>	<b>14.8</b>	<b>63.1</b>	<b>53.6</b>	<b>55.6</b>	<b>22.6</b>	<b>32.4</b>	<b>29.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

<b>Kingsport Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2021</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kingsport TN-VA MMSA	207	29,820	100.0	11,491	21.1	9.7	6.5	18.5	20.8	17.6	19.9	21.3	21.3	40.5	47.3	37.8	0.0	1.0	16.7
<b>Total</b>	<b>207</b>	<b>29,820</b>	<b>100.0</b>	<b>11,491</b>	<b>21.1</b>	<b>9.7</b>	<b>6.5</b>	<b>18.5</b>	<b>20.8</b>	<b>17.6</b>	<b>19.9</b>	<b>21.3</b>	<b>21.3</b>	<b>40.5</b>	<b>47.3</b>	<b>37.8</b>	<b>0.0</b>	<b>1.0</b>	<b>16.7</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kingsport Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kingsport TN-VA MMSA	305	13,844	100.0	5,174	0.0	0.0	0.0	21.0	20.7	17.7	56.2	56.1	56.8	22.8	23.3	25.5	0.0	0.0	0.0
<b>Total</b>	<b>305</b>	<b>13,844</b>	<b>100.0</b>	<b>5,174</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>21.0</b>	<b>20.7</b>	<b>17.7</b>	<b>56.2</b>	<b>56.1</b>	<b>56.8</b>	<b>22.8</b>	<b>23.3</b>	<b>25.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kingsport Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Kingsport TN-VA MMSA	305	13,844	100.0	5,174	83.2	76.1	43.1	4.2	20.3	12.6	3.6	
<b>Total</b>	<b>305</b>	<b>13,844</b>	<b>100.0</b>	<b>5,174</b>	<b>83.2</b>	<b>76.1</b>	<b>43.1</b>	<b>4.2</b>	<b>20.3</b>	<b>12.6</b>	<b>3.6</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kingsport Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Kingsport TN-VA MMSA	3	36	100.0	450	0.0	0.0	0.0	11.1	0.0	2.7	66.9	33.3	77.3	22.0	66.7	20.0	0.0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>36</b>	<b>100.0</b>	<b>450</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>11.1</b>	<b>0.0</b>	<b>2.7</b>	<b>66.9</b>	<b>33.3</b>	<b>77.3</b>	<b>22.0</b>	<b>66.7</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Kingsport Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Kingsport TN-VA MMSA	3	36	100.0	450	96.1	100.0	50.4	0.9	0.0	3.1	0.0		
<b>Total</b>	<b>3</b>	<b>36</b>	<b>100.0</b>	<b>450</b>	<b>96.1</b>	<b>100.0</b>	<b>50.4</b>	<b>0.9</b>	<b>0.0</b>	<b>3.1</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.



Cumberland Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cumberland MD-WV MMSA	69	7,868	100.0	3,217	0.0	0.0	0.0	12.8	10.1	10.9	69.0	68.1	68.0	18.2	21.7	21.0	0.0	0.0	0.0
<b>Total</b>	<b>69</b>	<b>7,868</b>	<b>100.0</b>	<b>3,217</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>12.8</b>	<b>10.1</b>	<b>10.9</b>	<b>69.0</b>	<b>68.1</b>	<b>68.0</b>	<b>18.2</b>	<b>21.7</b>	<b>21.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Cumberland Multi-state: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cumberland MD-WV MMSA	69	7,868	100.0	3,217	21.3	7.2	6.7	18.2	18.8	16.7	20.1	26.1	17.8	40.4	42.0	34.6	0.0	5.8	24.2
<b>Total</b>	<b>69</b>	<b>7,868</b>	<b>100.0</b>	<b>3,217</b>	<b>21.3</b>	<b>7.2</b>	<b>6.7</b>	<b>18.2</b>	<b>18.8</b>	<b>16.7</b>	<b>20.1</b>	<b>26.1</b>	<b>17.8</b>	<b>40.4</b>	<b>42.0</b>	<b>34.6</b>	<b>0.0</b>	<b>5.8</b>	<b>24.2</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Cumberland Multi-state: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cumberland MD-WV MMSA	75	3,454	100.0	1,538	0.0	0.0	0.0	15.5	13.3	11.4	61.5	57.3	63.1	23.0	29.3	25.5	0.0	0.0	0.0
<b>Total</b>	<b>75</b>	<b>3,454</b>	<b>100.0</b>	<b>1,538</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.5</b>	<b>13.3</b>	<b>11.4</b>	<b>61.5</b>	<b>57.3</b>	<b>63.1</b>	<b>23.0</b>	<b>29.3</b>	<b>25.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Cumberland Multi-state: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Cumberland MD-WV MMSA	75	3,454	100.0	1,538	82.0	82.7	44.7	4.3	16.0	13.6	1.3		
<b>Total</b>	<b>75</b>	<b>3,454</b>	<b>100.0</b>	<b>1,538</b>	<b>82.0</b>	<b>82.7</b>	<b>44.7</b>	<b>4.3</b>	<b>16.0</b>	<b>13.6</b>	<b>1.3</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Cumberland Multi-state: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Cumberland MD-WV MMSA	0	0	0.0	23	0.0	0.0	0.0	10.3	0.0	0.0	77.9	0.0	95.7	11.8	0.0	4.3	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>23</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.3</b>	<b>0.0</b>	<b>0.0</b>	<b>77.9</b>	<b>0.0</b>	<b>95.7</b>	<b>11.8</b>	<b>0.0</b>	<b>4.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

Cumberland Multi-state: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Cumberland MD-WV MMSA	--		--	23	99.0	--	17.4	1.0	--	0.0	--		
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>23</b>	<b>99.0</b>	<b>--</b>	<b>17.4</b>	<b>1.0</b>	<b>--</b>	<b>0.0</b>	<b>--</b>		

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent.

## APPENDIX E: DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

### FLORIDA

#### North Port MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 833,716, and the number of census tracts increased to 217. Regarding housing costs, the median housing value increased to \$295,896, and the median gross rent increased to \$1,304.

Demographic Information for the North Port MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	2.3	24.7	45.4	26.4	1.1
Population by Geography	735,767	2.8	23.7	47.5	26.0	0.0
Housing Units by Geography	407,196	1.8	22.5	47.5	28.2	0.0
Owner-Occupied Units by Geography	221,993	1.0	18.3	50.7	29.9	0.0
Occupied Rental Units by Geography	87,917	4.5	33.8	43.7	18.1	0.0
Vacant Units by Geography	97,286	1.2	21.6	43.5	33.7	0.0
Businesses by Geography	149,530	1.4	19.6	43.6	35.4	0.0
Farms by Geography	4,202	2.3	20.2	44.1	33.3	0.0
Family Distribution by Income Level	194,874	19.4	19.1	21.0	40.5	0.0
Household Distribution by Income Level	309,910	23.1	17.1	18.1	41.7	0.0
Median Family Income - North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$210,725
			Median Gross Rent			\$1,020
			Families Below Poverty Level			8.4%

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

#### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 40 financial institutions operated 233 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 14.1 percent deposit market share.

## Jacksonville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 1.6 million, and the number of census tracts increased to 343. Regarding housing costs, the median housing value increased to \$229,066, and the median gross rent increased to \$1,134.

Demographic Information for the Jacksonville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	262	7.6	26.3	37.8	26.7	1.5
Population by Geography	1,401,600	5.1	23.6	40.9	30.4	0.0
Housing Units by Geography	610,600	5.9	23.8	39.4	31.0	0.0
Owner-Occupied Units by Geography	339,445	3.4	19.7	41.3	35.6	0.0
Occupied Rental Units by Geography	183,261	8.3	30.5	38.4	22.8	0.0
Vacant Units by Geography	87,894	10.2	25.9	34.0	29.9	0.0
Businesses by Geography	252,282	4.3	21.8	34.9	39.0	0.0
Farms by Geography	6,387	3.4	21.2	44.2	31.2	0.0
Family Distribution by Income Level	343,061	21.8	17.4	20.0	40.9	0.0
Household Distribution by Income Level	522,706	23.7	16.5	17.7	42.2	0.0
Median Family Income - Jacksonville, FL MSA		\$64,042	Median Housing Value			\$173,807
			Median Gross Rent			\$989
			Families Below Poverty Level			11.1%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 34 financial institutions operated 242 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 3.1 percent deposit market share.

## Deltona MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 668,921, and the number of census tracts increased to 154. Regarding housing costs, the median housing value increased to \$206,933, and the median gross rent increased to \$1,124.

Demographic Information for the Deltona MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	3.0	17.8	55.6	22.2	1.5
Population by Geography	604,502	1.9	16.6	61.2	20.3	0.0
Housing Units by Geography	304,710	1.7	17.0	58.3	23.0	0.0
Owner-Occupied Units by Geography	168,828	0.8	12.6	62.4	24.2	0.0
Occupied Rental Units by Geography	68,302	3.9	27.7	54.5	14.0	0.0
Vacant Units by Geography	67,580	1.9	17.3	51.9	28.9	0.0
Businesses by Geography	100,870	2.1	18.4	55.8	23.7	0.0
Farms by Geography	3,592	1.2	17.6	60.3	20.9	0.0
Family Distribution by Income Level	149,233	19.1	19.1	21.0	40.8	0.0
Household Distribution by Income Level	237,130	22.4	17.1	19.0	41.4	0.0
Median Family - Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$148,623
			Median Gross Rent			\$950
			Families Below Poverty Level			11.4%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 20 financial institutions operated 120 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 19.7 percent deposit market share.

## Cape Coral MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 760,822, and the number of census tracts increased to 223. Regarding housing costs, the median housing value increased to \$264,556, and the median gross rent increased to \$1,253.

Demographic Information for the Cape Coral MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	4.2	25.1	35.9	33.5	1.2
Population by Geography	663,675	4.7	27.1	42.3	25.9	0.0
Housing Units by Geography	374,333	3.5	21.3	40.9	34.4	0.0
Owner-Occupied Units by Geography	174,162	2.1	18.6	44.2	35.1	0.0
Occupied Rental Units by Geography	78,125	8.5	32.9	38.0	20.5	0.0
Vacant Units by Geography	122,046	2.3	17.6	38.0	42.1	0.0
Businesses by Geography	132,866	2.9	22.8	41.0	33.1	0.1
Farms by Geography	3,904	3.2	26.6	46.4	23.8	0.0
Family Distribution by Income Level	165,635	20.7	18.5	19.7	41.1	0.0
Household Distribution by Income Level	252,287	22.6	17.2	18.8	41.4	0.0
Median Family Income - Cape Coral-Fort Myers, FL MSA	\$57,627	Median Housing Value				\$192,233
		Median Gross Rent				\$970
		Families Below Poverty Level				11.1%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 32 financial institutions operated 165 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 14.3 percent deposit market share.

## Palm Bay MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 606,612, and the number of census tracts increased to 148. Regarding housing costs, the median housing value increased to \$225,108, and the median gross rent increased to \$1,121.

Demographic Information for the Palm Bay MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	5.3	22.8	41.2	28.1	2.6
Population by Geography	553,591	3.4	23.5	43.2	29.9	0.0
Housing Units by Geography	271,654	3.7	24.7	42.7	28.8	0.0
Owner-Occupied Units by Geography	159,654	1.6	21.1	43.5	33.8	0.0
Occupied Rental Units by Geography	63,137	8.5	32.5	38.2	20.7	0.0
Vacant Units by Geography	48,863	4.6	26.5	46.0	22.9	0.0
Businesses by Geography	88,967	2.7	23.2	39.0	35.0	0.1
Farms by Geography	2,826	3.6	25.5	42.8	28.1	0.0
Family Distribution by Income Level	141,695	20.2	18.6	20.6	40.6	0.0
Household Distribution by Income Level	222,791	23.1	16.8	18.6	41.5	0.0
Median Family Income - Palm Bay-Melbourne-Titusville, FL MSA	\$60,408	Median Housing Value				\$147,917
		Median Gross Rent				\$932
		Families Below Poverty Level				9.9%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 91 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 20.4 percent deposit market share.



## Lakeland MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 725,046, and the number of census tracts increased to 174. Regarding housing costs, the median housing value increased to \$153,224, and the median gross rent increased to \$1,041.

Demographic Information for the Lakeland MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	4.5	22.7	51.3	20.8	0.6
Population by Geography	626,676	2.5	22.4	55.6	19.5	0.0
Housing Units by Geography	282,248	2.3	21.5	57.8	18.3	0.0
Owner-Occupied Units by Geography	152,336	1.3	17.3	58.8	22.6	0.0
Occupied Rental Units by Geography	69,045	4.9	30.2	51.6	13.3	0.0
Vacant Units by Geography	60,867	2.0	22.1	62.5	13.4	0.0
Businesses by Geography	82,041	3.8	19.7	54.2	22.3	0.0
Farms by Geography	3,070	2.6	17.9	59.6	19.9	0.0
Family Distribution by Income Level	153,115	20.4	18.3	21.4	39.8	0.0
Household Distribution by Income Level	221,381	22.1	17.1	18.8	42.0	0.0
Median Family Income - Lakeland-Winter Haven, FL MSA	\$50,986	Median Housing Value				\$106,344
		Median Gross Rent				\$884
		Families Below Poverty Level				13.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operated 84 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 19.2 percent deposit market share.

## Port St. Lucie MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 487,657, and the number of census tracts increased to 111. Regarding housing costs, the median housing value increased to \$235,449, and the median gross rent increased to \$1,210.

Demographic Information for the Port St. Lucie MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	4.9	21.0	40.7	28.4	4.9
Population by Geography	439,592	3.6	19.7	51.8	25.0	0.0
Housing Units by Geography	215,909	3.4	17.0	49.6	30.0	0.0
Owner-Occupied Units by Geography	125,375	1.6	13.0	54.4	30.9	0.0
Occupied Rental Units by Geography	44,475	8.4	32.5	41.9	17.1	0.0
Vacant Units by Geography	46,059	3.4	12.7	44.0	39.9	0.0
Businesses by Geography	81,030	3.1	18.6	48.9	29.4	0.1
Farms by Geography	2,730	3.4	25.0	46.0	25.6	0.0
Family Distribution by Income Level	110,529	19.8	18.7	19.9	41.6	0.0
Household Distribution by Income Level	169,850	23.8	16.0	18.2	41.9	0.0
Median Family Income - Port St. Lucie, FL MSA		\$56,570	Median Housing Value			\$159,862
			Median Gross Rent			\$1,004
			Families Below Poverty Level			11.3%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 82 full-service branches within the assessment area. Of these institutions, Truist ranked 8<sup>th</sup> with 8.3 percent deposit market share.

## Ocala MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 375,908, and the number of census tracts increased to 93. Regarding housing costs, the median housing value increased to \$150,910, and the median gross rent increased to \$883.

Demographic Information for the Ocala MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	3.2	23.8	54.0	15.9	3.2
Population by Geography	336,811	2.3	18.5	63.6	15.7	0.0
Housing Units by Geography	163,687	2.0	17.9	66.6	13.6	0.0
Owner-Occupied Units by Geography	99,961	0.6	14.5	69.6	15.3	0.0
Occupied Rental Units by Geography	32,326	5.6	26.3	56.5	11.6	0.0
Vacant Units by Geography	31,400	2.6	20.0	67.3	10.1	0.0
Businesses by Geography	48,746	1.8	16.6	63.4	18.2	0.0
Farms by Geography	2,957	1.0	17.8	67.7	13.5	0.0
Family Distribution by Income Level	86,114	19.3	19.5	21.6	39.7	0.0
Household Distribution by Income Level	132,287	21.4	17.5	19.4	41.7	0.0
Median Family Income - Ocala, FL MSA		\$48,128	Median Housing Value			\$115,544
			Median Gross Rent			\$802
			Families Below Poverty Level			13.2%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 18 financial institutions operated 61 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 25.6 percent deposit market share.

## Naples MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 375,752, and the number of census tracts increased to 109. Regarding housing costs, the median housing value significantly increased to \$472,689, and the median gross rent increased to \$1,368.

Demographic Information for the Naples MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	8.1	20.3	35.1	35.1	1.4
Population by Geography	341,091	7.2	23.5	38.0	31.3	0.0
Housing Units by Geography	201,582	3.6	18.3	38.0	40.0	0.0
Owner-Occupied Units by Geography	93,733	2.3	16.3	41.3	40.1	0.0
Occupied Rental Units by Geography	36,155	9.5	28.3	37.8	24.5	0.0
Vacant Units by Geography	71,694	2.4	15.9	33.8	47.8	0.0
Businesses by Geography	81,803	2.8	14.3	37.9	45.1	0.0
Farms by Geography	1,969	5.6	21.3	42.9	30.2	0.0
Family Distribution by Income Level	87,665	20.8	17.7	19.3	42.2	0.0
Household Distribution by Income Level	129,888	22.3	17.1	18.4	42.2	0.0
Median Family Income - Naples-Marco Island, FL MSA		\$66,264	Median Housing Value			\$347,465
			Median Gross Rent			\$1,087
			Families Below Poverty Level			9.1%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 34 financial institutions operated 131 full-service branches within the assessment area. Of these institutions, Truist ranked 8<sup>th</sup> with 4.7 percent deposit market share.

## Tallahassee MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 384,298, and the number of census tracts increased to 104. Regarding housing costs, the median housing value increased to \$172,008, and the median gross rent increased to \$993.

Demographic Information for the Tallahassee MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	16.3	24.4	32.6	22.1	4.7
Population by Geography	374,690	14.1	22.3	35.9	24.0	3.6
Housing Units by Geography	164,810	14.9	22.6	37.5	22.7	2.3
Owner-Occupied Units by Geography	82,146	4.9	18.0	41.9	34.7	0.6
Occupied Rental Units by Geography	61,754	26.7	26.5	31.7	10.3	4.8
Vacant Units by Geography	20,910	19.6	29.1	37.3	12.0	2.0
Businesses by Geography	58,455	8.5	21.0	40.4	28.7	1.5
Farms by Geography	1,901	4.7	16.7	48.4	29.6	0.5
Family Distribution by Income Level	83,490	23.4	16.7	19.6	40.2	0.0
Household Distribution by Income Level	143,900	25.6	15.1	16.7	42.6	0.0
Median Family Income - Tallahassee, FL MSA		\$64,055	Median Housing Value			\$152,385
			Median Gross Rent			\$896
			Families Below Poverty Level			12.4%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 75 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 11.9 percent deposit market share.

## Homosassa Springs MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 153,843, and the number of census tracts increased to 42. Regarding housing costs, the median housing value increased to \$156,203; however, the median gross rent decreased to \$774.

Demographic Information for the Homosassa Springs MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	21.4	60.7	14.3	3.6
Population by Geography	139,654	0.0	21.9	59.8	18.3	0.0
Housing Units by Geography	77,819	0.0	21.5	60.9	17.6	0.0
Owner-Occupied Units by Geography	49,534	0.0	20.1	62.7	17.3	0.0
Occupied Rental Units by Geography	11,478	0.0	28.2	54.9	16.9	0.0
Vacant Units by Geography	16,807	0.0	21.0	59.8	19.1	0.0
Businesses by Geography	17,464	0.0	16.8	62.2	21.0	0.0
Farms by Geography	962	0.0	19.0	62.9	18.1	0.0
Family Distribution by Income Level	39,016	18.2	19.4	22.5	39.9	0.0
Household Distribution by Income Level	61,012	21.6	18.4	18.2	41.8	0.0
Median Family Income - Homosassa Springs, FL MSA		\$47,829	Median Housing Value			\$118,117
			Median Gross Rent			\$812
			Families Below Poverty Level			11.4%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 10 financial institutions operated 35 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 27.7 percent deposit market share.

## Pensacola MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 509,905, and the number of census tracts increased to 116. Regarding housing costs, the median housing value increased to \$183,148, and the median gross rent increased to \$1,065.

Demographic Information for the Pensacola MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	98	4.1	21.4	52.0	20.4	2.0
Population by Geography	467,348	2.5	18.6	54.8	24.1	0.0
Housing Units by Geography	204,964	2.5	20.0	51.9	25.6	0.0
Owner-Occupied Units by Geography	112,276	1.6	15.2	54.7	28.5	0.0
Occupied Rental Units by Geography	60,038	3.7	29.0	49.8	17.5	0.0
Vacant Units by Geography	32,650	3.5	20.1	46.3	30.2	0.0
Businesses by Geography	67,184	2.3	19.5	50.9	27.3	0.0
Farms by Geography	2,317	1.9	14.6	59.9	23.6	0.0
Family Distribution by Income Level	111,232	18.6	19.1	22.7	39.7	0.0
Household Distribution by Income Level	172,314	22.5	17.4	19.4	40.7	0.0
Median Family Income - Pensacola-Ferry Pass-Brent, FL MSA		\$60,705	Median Housing Value			\$141,126
			Median Gross Rent			\$944
			Families Below Poverty Level			9.9%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 22 financial institutions operated 79 full-service branches within the assessment area. Of these institutions, Truist ranked 5<sup>th</sup> with 9.0 percent deposit market share.

## Punta Gorda MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 186,847, and the number of census tracts increased to 47. Regarding housing costs, the median housing value significantly increased to \$230,785, and the median gross rent increased to \$1,043.

Demographic Information for the Punta Gorda MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	15.4	59.0	23.1	2.6
Population by Geography	165,783	0.0	14.4	69.7	15.8	0.0
Housing Units by Geography	101,195	0.0	13.1	66.8	20.1	0.0
Owner-Occupied Units by Geography	56,019	0.0	10.7	70.6	18.6	0.0
Occupied Rental Units by Geography	15,837	0.0	23.5	66.1	10.4	0.0
Vacant Units by Geography	29,339	0.0	12.1	59.9	28.1	0.0
Businesses by Geography	27,830	0.0	16.2	65.6	18.1	0.0
Farms by Geography	933	0.0	25.5	62.8	11.7	0.0
Family Distribution by Income Level	46,876	17.3	20.7	21.8	40.2	0.0
Household Distribution by Income Level	71,856	21.4	17.9	19.3	41.4	0.0
Median Family Income - Punta Gorda, FL MSA		\$54,478	Median Housing Value			\$160,661
			Median Gross Rent			\$912
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 41 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 15.8 percent deposit market share.



## Crestview MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 286,973, and the number of census tracts increased to 70. Regarding housing costs, the median housing value increased to \$299,654, and the median gross rent increased to \$1,233.

Demographic Information for the Crestview MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	16.4	56.4	21.8	5.5
Population by Geography	251,724	0.0	14.8	63.3	21.8	0.0
Housing Units by Geography	141,156	0.0	12.6	53.5	33.9	0.0
Owner-Occupied Units by Geography	64,419	0.0	12.2	62.3	25.5	0.0
Occupied Rental Units by Geography	33,955	0.0	17.4	63.3	19.4	0.0
Vacant Units by Geography	42,782	0.0	9.3	32.6	58.1	0.0
Businesses by Geography	52,280	0.0	10.1	53.2	36.7	0.0
Farms by Geography	1,389	0.0	15.2	62.7	22.1	0.0
Family Distribution by Income Level	64,717	20.3	17.9	21.5	40.3	0.0
Household Distribution by Income Level	98,374	22.8	17.5	18.1	41.6	0.0
Median Family Income - Crestview-Fort Walton Beach-Destin, FL MSA		\$63,539	Median Housing Value			\$224,687
			Median Gross Rent			\$1,065
			Families Below Poverty Level			10.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 24 financial institutions operated 89 full-service branches within the assessment area. Of these institutions, Truist ranked 10<sup>th</sup> with 3.2 percent deposit market share.

## FL Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 203,813. Regarding housing costs, the median housing value increased to \$343,155, and the median gross rent increased to \$1,289.

Demographic Information for the FL Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	1.6	14.3	36.5	41.3	6.3
Population by Geography	199,013	1.2	18.3	42.9	37.6	0.0
Housing Units by Geography	106,752	1.0	16.3	35.3	47.4	0.0
Owner-Occupied Units by Geography	46,558	1.1	17.5	40.8	40.6	0.0
Occupied Rental Units by Geography	22,945	1.5	20.9	38.1	39.5	0.0
Vacant Units by Geography	37,249	0.5	12.1	26.7	60.6	0.0
Businesses by Geography	34,097	0.8	10.7	30.4	58.1	0.1
Farms by Geography	1,550	0.5	16.7	52.1	30.7	0.0
Family Distribution by Income Level	43,750	20.0	15.6	19.1	45.3	0.0
Household Distribution by Income Level	69,503	21.4	15.1	16.4	47.0	0.0
Median Family Income Non-MSAs - FL		\$46,899	Median Housing Value			\$278,983
			Median Gross Rent			\$1,056
			Families Below Poverty Level			15.6%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 60 full-service branches within the assessment area. Of these institutions, Truist ranked 5<sup>th</sup> with 9.4 percent deposit market share.

## Gainesville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 339,247, and the number of census tracts increased to 76. Regarding housing costs, the median housing value increased to \$169,923, and the median gross rent increased to \$997.

Demographic Information for the Gainesville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	71	9.9	29.6	33.8	22.5	4.2
Population by Geography	311,031	7.7	30.3	33.6	26.2	2.2
Housing Units by Geography	140,829	7.5	29.7	34.6	25.1	3.2
Owner-Occupied Units by Geography	68,353	1.8	27.1	37.1	33.6	0.5
Occupied Rental Units by Geography	50,053	14.5	30.1	31.3	18.1	6.0
Vacant Units by Geography	22,423	9.4	36.6	34.4	14.7	4.9
Businesses by Geography	42,171	6.1	24.1	35.3	33.6	0.9
Farms by Geography	1,908	2.7	25.3	48.7	23.0	0.2
Family Distribution by Income Level	66,597	23.6	16.2	19.1	41.1	0.0
Household Distribution by Income Level	118,406	26.9	15.1	14.8	43.2	0.0
Median Family Income - Gainesville, FL MSA		\$60,014	Median Housing Value			\$139,741
			Median Gross Rent			\$879
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 70 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 6.3 percent deposit market share.

## Sebastian MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 159,788, and the number of census tracts increased to 45. Regarding housing costs, the median housing value increased to \$266,986, and the median gross rent increased to \$981.

Demographic Information for the Sebastian MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	16.1	48.4	25.8	6.5
Population by Geography	142,866	2.7	19.3	53.4	24.7	0.0
Housing Units by Geography	77,059	2.9	15.8	51.6	29.6	0.0
Owner-Occupied Units by Geography	43,168	1.4	13.4	54.1	31.1	0.0
Occupied Rental Units by Geography	14,657	8.0	27.7	48.6	15.7	0.0
Vacant Units by Geography	19,234	2.3	12.2	48.4	37.1	0.0
Businesses by Geography	28,421	6.4	13.7	47.1	32.7	0.2
Farms by Geography	1,146	2.4	24.3	53.0	20.1	0.3
Family Distribution by Income Level	36,247	20.6	18.6	18.6	42.2	0.0
Household Distribution by Income Level	57,825	23.2	17.5	17.1	42.2	0.0
Median Family Income - Sebastian-Vero Beach, FL MSA	\$58,448	Median Housing Value				\$200,703
		Median Gross Rent				\$864
		Families Below Poverty Level				9.0%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 42 full-service branches within the assessment area. Of these institutions, Truist ranked 10<sup>th</sup> with 4.9 percent deposit market share.

## The Villages MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 129,752 and the number of census tracts increased to 28. Regarding housing costs, the median housing value increased to \$247,158, and the median gross rent increased to \$1,008.

Demographic Information for The Villages MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	42.1	36.8	0.0	15.8
Population by Geography	108,501	0.9	25.4	65.2	0.0	8.5
Housing Units by Geography	61,171	0.7	26.1	73.2	0.0	0.1
Owner-Occupied Units by Geography	43,312	0.2	23.0	76.8	0.0	0.0
Occupied Rental Units by Geography	4,727	3.5	40.2	55.8	0.0	0.5
Vacant Units by Geography	13,132	1.0	31.4	67.4	0.0	0.2
Businesses by Geography	10,084	1.5	34.4	63.9	0.0	0.2
Farms by Geography	459	1.7	53.8	44.2	0.0	0.2
Family Distribution by Income Level	32,883	15.5	20.8	24.3	39.5	0.0
Household Distribution by Income Level	48,039	21.1	18.1	20.4	40.5	0.0
Median Family Income - The Villages, FL MSA		\$60,099	Median Housing Value			\$194,761
			Median Gross Rent			\$819
			Families Below Poverty Level			6.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 28 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 9.6 percent deposit market share.

## Panama City MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population slightly decreased to 175,216, however, the number of census tracts increased to 50. Regarding housing costs, the median housing value increased to \$203,088, and the median gross rent increased to \$1,119.

Demographic Information for the Panama City MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	4.5	20.5	50.0	22.7	2.3
Population by Geography	175,353	3.6	16.7	52.2	27.5	0.0
Housing Units by Geography	100,109	3.2	15.6	54.2	26.9	0.0
Owner-Occupied Units by Geography	41,737	2.5	13.3	52.4	31.8	0.0
Occupied Rental Units by Geography	26,185	5.3	22.7	50.6	21.5	0.0
Vacant Units by Geography	32,187	2.5	12.9	59.5	25.1	0.0
Businesses by Geography	30,540	3.2	16.8	54.0	25.9	0.0
Farms by Geography	821	2.8	13.4	56.3	27.5	0.0
Family Distribution by Income Level	43,485	21.1	17.7	19.9	41.3	0.0
Household Distribution by Income Level	67,922	22.4	16.7	19.1	41.8	0.0
Median Family Income - Panama City, FL MSA		\$57,635	Median Housing Value			\$160,962
			Median Gross Rent			\$958
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 18 financial institutions operated 51 full-service branches within the assessment area. Of these institutions, Truist ranked 8<sup>th</sup> with 6.3 percent deposit market share.

## Sebring MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 101,235, and the number of census tracts increased to 35. Regarding housing costs, the median housing value increased to \$116,509, and the median gross rent increased to \$777.

Demographic Information for the Sebring MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	7.4	66.7	14.8	11.1
Population by Geography	98,328	0.0	9.0	75.6	15.4	0.0
Housing Units by Geography	55,066	0.0	7.8	77.2	15.0	0.0
Owner-Occupied Units by Geography	30,667	0.0	4.5	76.6	18.9	0.0
Occupied Rental Units by Geography	9,730	0.0	17.5	75.6	6.9	0.1
Vacant Units by Geography	14,669	0.0	8.1	79.6	12.3	0.0
Businesses by Geography	14,085	0.0	7.8	75.2	16.6	0.5
Farms by Geography	768	0.0	3.9	72.7	22.5	0.9
Family Distribution by Income Level	25,837	16.6	20.3	21.6	41.4	0.0
Household Distribution by Income Level	40,397	21.2	17.1	21.0	40.7	0.0
Median Family Income - Sebring-Avon Park, FL MSA		\$42,321	Median Housing Value			\$87,639
			Median Gross Rent			\$719
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 18 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 10.5 percent deposit market share.

## NORTH CAROLINA

### Winston-Salem MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 675,966 and the number of census tracts increased to 169. Regarding housing costs, the median housing value increased to \$161,417, and the median gross rent increased to \$801.

Demographic Information for the Winston-Salem MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	150	10.7	18.7	39.3	30.0	1.3
Population by Geography	651,630	7.7	20.3	40.8	30.6	0.6
Housing Units by Geography	289,934	7.7	20.8	41.5	29.7	0.3
Owner-Occupied Units by Geography	174,068	3.3	15.8	44.9	35.9	0.0
Occupied Rental Units by Geography	83,588	16.0	28.9	34.5	19.7	0.8
Vacant Units by Geography	32,278	9.5	27.1	41.3	21.7	0.4
Businesses by Geography	51,984	6.0	17.3	37.6	38.4	0.6
Farms by Geography	1,904	2.1	15.6	47.6	34.4	0.3
Family Distribution by Income Level	170,293	22.4	17.6	19.0	41.1	0.0
Household Distribution by Income Level	257,656	23.6	16.7	17.1	42.6	0.0
Median Family Income - Winston-Salem-Salem, NC MSA	\$56,536	Median Housing Value				\$145,961
		Median Gross Rent				\$704
		Families Below Poverty Level				13.2%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 19 financial institutions operated 125 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 28.5 percent deposit market share.



## Asheville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 469,015, and the number of census tracts increased to 123. Regarding housing costs, the median housing value increased to \$252,636, and the median gross rent increased to \$955.

Demographic Information for the Asheville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	16.2	59.0	21.0	1.9
Population by Geography	437,252	1.6	14.0	63.9	20.5	0.0
Housing Units by Geography	216,383	1.9	14.2	63.2	20.7	0.0
Owner-Occupied Units by Geography	123,308	1.3	12.1	64.2	22.4	0.0
Occupied Rental Units by Geography	59,192	3.1	18.7	59.3	18.9	0.0
Vacant Units by Geography	33,883	2.1	13.9	66.3	17.8	0.0
Businesses by Geography	50,098	2.9	15.3	53.9	27.9	0.0
Farms by Geography	1,801	1.2	15.9	63.2	19.7	0.0
Family Distribution by Income Level	113,150	20.2	18.6	20.5	40.7	0.0
Household Distribution by Income Level	182,500	23.5	16.5	18.2	41.9	0.0
Median Family Income - Asheville, NC MSA		\$57,243	Median Housing Value			\$192,460
			Median Gross Rent			\$790
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 19 financial institutions operated 97 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 14.7 percent deposit market share.

## Wilmington MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 285,905, and the number of census tracts increased to 71. Regarding housing costs, the median housing value increased to \$264,677, and the median gross rent increased to \$1,044.

Demographic Information for the Wilmington MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	14.8	18.0	29.5	32.8	4.9
Population by Geography	268,257	13.2	17.0	40.1	29.7	0.0
Housing Units by Geography	131,212	12.6	15.5	37.6	34.3	0.0
Owner-Occupied Units by Geography	66,128	4.9	14.4	44.4	36.3	0.0
Occupied Rental Units by Geography	42,405	25.8	18.8	34.0	21.5	0.0
Vacant Units by Geography	22,679	10.6	12.3	24.5	52.6	0.0
Businesses by Geography	34,119	12.2	11.1	34.9	41.6	0.3
Farms by Geography	927	8.3	22.9	38.5	30.2	0.1
Family Distribution by Income Level	65,424	22.7	17.6	18.4	41.3	0.0
Household Distribution by Income Level	108,533	25.1	15.5	17.5	41.9	0.0
Median Family Income - Wilmington, NC MSA		\$64,357	Median Housing Value			\$222,834
			Median Gross Rent			\$917
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 21 financial institutions operated 59 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 12.5 percent deposit market share.

## Hickory MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, changes have occurred in the assessment area. The total population increased to 365,276, and the number of census tracts increased to 81. Regarding housing costs, the median housing value increased to \$145,762, and the median gross rent increased to \$718.

Demographic Information for the Hickory MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	0.0	13.7	68.5	17.8	0.0
Population by Geography	363,074	0.0	12.9	67.4	19.7	0.0
Housing Units by Geography	162,341	0.0	13.4	66.4	20.2	0.0
Owner-Occupied Units by Geography	97,673	0.0	10.5	67.5	22.0	0.0
Occupied Rental Units by Geography	40,295	0.0	19.9	64.8	15.3	0.0
Vacant Units by Geography	24,373	0.0	14.0	64.6	21.4	0.0
Businesses by Geography	24,964	0.0	14.4	58.2	27.4	0.0
Farms by Geography	937	0.0	10.0	68.0	22.0	0.0
Family Distribution by Income Level	92,771	20.8	17.8	21.1	40.3	0.0
Household Distribution by Income Level	137,968	23.5	16.6	18.0	42.0	0.0
Median Family Income - Hickory-Lenoir-Morganton, NC MSA		\$51,281	Median Housing Value			\$127,437
			Median Gross Rent			\$633
			Families Below Poverty Level			13.2%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operated 64 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 24.8 percent deposit market share.

## Fayetteville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 520,378, and the number of census tracts increased to 121. Regarding housing costs, the median housing value increased to \$141,772, and the median gross rent increased to \$953.

Demographic Information for the Fayetteville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	104	1.9	21.2	58.7	13.5	4.8
Population by Geography	499,998	1.0	16.1	63.5	18.6	0.8
Housing Units by Geography	210,324	1.2	16.5	65.3	17.0	0.0
Owner-Occupied Units by Geography	103,866	0.5	12.2	64.3	23.0	0.0
Occupied Rental Units by Geography	78,439	2.0	21.5	66.4	10.1	0.0
Vacant Units by Geography	28,019	1.5	18.1	65.9	14.5	0.0
Businesses by Geography	36,133	1.6	18.0	59.4	20.9	0.1
Farms by Geography	1,124	0.4	12.4	63.8	23.4	0.1
Family Distribution by Income Level	123,656	20.7	17.3	19.1	42.9	0.0
Household Distribution by Income Level	182,305	21.8	16.4	18.0	43.8	0.0
Median Family Income - Fayetteville, NC MSA		\$52,485	Median Housing Value			\$130,192
			Median Gross Rent			\$867
			Families Below Poverty Level			14.5%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 72 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 32.5 percent deposit market share.

## Greenville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Although, the total population decreased to 170,243, the number of census tracts increased to 42. Regarding housing costs, the median housing value increased to \$139,503, and the median gross rent increased to \$792.

Demographic Information for the Greenville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	12.5	25.0	34.4	28.1	0.0
Population by Geography	173,798	10.8	22.5	38.5	28.3	0.0
Housing Units by Geography	76,269	12.5	22.7	38.7	26.0	0.0
Owner-Occupied Units by Geography	35,626	4.5	19.5	40.3	35.7	0.0
Occupied Rental Units by Geography	31,876	20.3	26.4	36.7	16.6	0.0
Vacant Units by Geography	8,767	17.1	22.6	39.7	20.6	0.0
Businesses by Geography	13,728	16.1	16.0	36.9	31.0	0.0
Farms by Geography	471	4.9	15.9	43.5	35.7	0.0
Family Distribution by Income Level	40,239	24.2	16.2	17.5	42.1	0.0
Household Distribution by Income Level	67,502	26.5	15.4	15.8	42.3	0.0
Median Family Income - Greenville, NC MSA		\$56,239	Median Housing Value			\$128,235
			Median Gross Rent			\$737
			Families Below Poverty Level			16.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 32 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 22.1 percent deposit market share.

## New Bern MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Although, the total population decreased to 122,168, the number of census tracts increased to 36. Regarding housing costs, the median housing value increased to \$155,717, and the median gross rent decreased to \$847.

Demographic Information for the New Bern MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	13.8	55.2	20.7	3.4
Population by Geography	127,598	4.4	15.4	53.4	26.9	0.0
Housing Units by Geography	58,177	5.1	15.5	54.2	25.2	0.0
Owner-Occupied Units by Geography	32,022	2.1	13.3	53.7	30.9	0.0
Occupied Rental Units by Geography	17,482	9.0	17.6	56.3	17.1	0.0
Vacant Units by Geography	8,673	8.4	19.6	51.7	20.4	0.0
Businesses by Geography	9,288	8.2	9.7	53.5	28.6	0.0
Farms by Geography	453	2.0	16.1	56.5	25.4	0.0
Family Distribution by Income Level	34,009	20.1	19.2	19.3	41.3	0.0
Household Distribution by Income Level	49,504	23.0	16.1	19.5	41.4	0.0
Median Family Income - New Bern, NC MSA		\$55,158	Median Housing Value			\$145,650
			Median Gross Rent			\$870
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 22 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 35.6 percent deposit market share.

## Burlington MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 171,415, and the number of census tracts increased to 37. Regarding housing costs, the median housing value increased to \$163,407, and the median gross rent increased to \$839.

Demographic Information for the Burlington MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	0.0	25.0	47.2	27.8	0.0
Population by Geography	155,258	0.0	28.9	46.0	25.0	0.0
Housing Units by Geography	67,804	0.0	28.9	45.7	25.3	0.0
Owner-Occupied Units by Geography	40,273	0.0	22.9	47.8	29.3	0.0
Occupied Rental Units by Geography	21,272	0.0	39.2	41.8	19.0	0.0
Vacant Units by Geography	6,259	0.0	33.1	45.5	21.3	0.0
Businesses by Geography	11,556	0.0	24.8	48.4	26.7	0.0
Farms by Geography	404	0.0	17.6	53.7	28.7	0.0
Family Distribution by Income Level	40,938	21.8	17.8	18.3	42.1	0.0
Household Distribution by Income Level	61,545	23.8	17.2	17.3	41.8	0.0
Median Family Income - Burlington, NC MSA		\$53,234	Median Housing Value			\$139,707
			Median Gross Rent			\$764
			Families Below Poverty Level			14.4%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 29 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 24.2 percent deposit market share.

## Goldsboro MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Although, the total population decreased to 117,333, the number of census tracts increased to 30. Regarding housing costs, the median housing value increased to \$120,220, and the median gross rent increased to \$787.

Demographic Information for the Goldsboro MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	38.5	50.0	11.5	0.0
Population by Geography	124,355	0.0	31.6	56.0	12.4	0.0
Housing Units by Geography	53,141	0.0	34.8	53.8	11.4	0.0
Owner-Occupied Units by Geography	28,479	0.0	26.7	56.0	17.3	0.0
Occupied Rental Units by Geography	19,051	0.0	42.8	52.2	5.1	0.0
Vacant Units by Geography	5,611	0.0	48.7	48.0	3.3	0.0
Businesses by Geography	7,701	0.0	35.3	53.0	11.8	0.0
Farms by Geography	442	0.0	17.0	64.9	18.1	0.0
Family Distribution by Income Level	31,600	22.8	17.9	19.4	39.9	0.0
Household Distribution by Income Level	47,530	23.8	16.9	16.3	42.9	0.0
Median Family Income - Goldsboro, NC MSA		\$50,552	Median Housing Value			\$110,634
			Median Gross Rent			\$710
			Families Below Poverty Level			16.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 10 financial institutions operated 23 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 40.0 percent deposit market share.



## Rocky Mount MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Although, the total population decreased to 143,870, the number of census tracts increased to 39. Regarding housing costs, the median housing value increased to \$117,769, and the median gross rent increased to \$740.

Demographic Information for the Rocky Mount MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	21.9	59.4	18.8	0.0
Population by Geography	150,002	0.0	20.5	58.1	21.4	0.0
Housing Units by Geography	67,094	0.0	21.4	59.4	19.2	0.0
Owner-Occupied Units by Geography	36,218	0.0	15.7	58.5	25.8	0.0
Occupied Rental Units by Geography	21,519	0.0	26.9	61.8	11.4	0.0
Vacant Units by Geography	9,357	0.0	30.6	57.7	11.7	0.0
Businesses by Geography	10,022	0.0	13.9	65.2	20.9	0.0
Farms by Geography	572	0.0	7.2	68.4	24.5	0.0
Family Distribution by Income Level	38,088	22.5	16.8	19.4	41.3	0.0
Household Distribution by Income Level	57,737	24.9	16.3	16.8	42.0	0.0
Median Family Income - Rocky Mount, NC MSA		\$48,812	Median Housing Value			\$106,006
			Median Gross Rent			\$676
			Families Below Poverty Level			16.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 11 financial institutions operated 33 full-service branches within the assessment area. Of these institutions, Truist ranked 5<sup>th</sup> with 13.7 percent deposit market share.

## Jacksonville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 204,576, and the number of census tracts increased to 46. Regarding housing costs, the median housing value increased to \$159,262, and the median gross rent increased to \$1,006.

Demographic Information for the Jacksonville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	18.8	56.3	15.6	9.4
Population by Geography	183,753	0.0	12.0	68.5	15.0	4.4
Housing Units by Geography	74,206	0.0	10.9	70.1	18.9	0.0
Owner-Occupied Units by Geography	33,428	0.0	3.8	76.3	19.9	0.0
Occupied Rental Units by Geography	28,757	0.0	20.4	67.6	12.0	0.0
Vacant Units by Geography	12,021	0.0	8.0	59.1	33.0	0.0
Businesses by Geography	10,891	0.0	11.1	68.7	19.5	0.7
Farms by Geography	449	0.0	6.2	76.8	16.9	0.0
Family Distribution by Income Level	44,838	18.2	18.6	23.9	39.3	0.0
Household Distribution by Income Level	62,185	21.1	17.6	21.6	39.7	0.0
Median Family Income - Jacksonville, NC MSA		\$51,012	Median Housing Value			\$153,933
			Median Gross Rent			\$950
			Families Below Poverty Level			11.9%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 11 financial institutions operated 22 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 14.2 percent deposit market share.

## GEORGIA

### Savannah MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 404,798, and the number of census tracts increased to 113. Regarding housing costs, the median housing value increased to \$222,811, and the median gross rent increased to \$1,102.

Demographic Information for the Savannah MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	11.2	31.5	30.3	22.5	4.5
Population by Geography	367,071	7.7	24.1	37.3	31.0	0.0
Housing Units by Geography	154,914	7.7	24.7	36.4	31.1	0.0
Owner-Occupied Units by Geography	79,241	4.0	16.9	41.2	37.9	0.0
Occupied Rental Units by Geography	55,544	11.5	34.9	30.6	23.0	0.0
Vacant Units by Geography	20,129	11.6	27.5	33.6	27.2	0.1
Businesses by Geography	48,257	7.1	20.5	35.6	36.6	0.2
Farms by Geography	977	3.7	17.1	44.0	35.2	0.0
Family Distribution by Income Level	87,366	22.9	16.3	20.5	40.3	0.0
Household Distribution by Income Level	134,785	24.9	15.7	17.3	42.1	0.0
Median Family Income - Savannah, GA MSA	\$61,754	Median Housing Value				\$182,813
					Median Gross Rent	\$961
					Families Below Poverty Level	12.8%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 24 financial institutions operated 85 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 23.4 percent deposit market share.

## Augusta MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 416,535, and the number of census tracts increased to 96. Regarding housing costs, the median housing value increased to \$150,036, and the median gross rent increased to \$937.

Demographic Information for the Augusta MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	80	13.8	31.3	32.5	22.5	0.0
Population by Geography	389,804	9.8	25.3	34.6	30.3	0.0
Housing Units by Geography	163,097	10.6	27.6	32.5	29.3	0.0
Owner-Occupied Units by Geography	87,149	6.0	23.9	34.6	35.5	0.0
Occupied Rental Units by Geography	49,721	17.6	31.9	30.0	20.6	0.0
Vacant Units by Geography	26,227	12.7	32.1	30.2	25.0	0.0
Businesses by Geography	38,964	8.9	23.0	28.7	39.4	0.0
Farms by Geography	1,138	6.0	28.2	33.0	32.8	0.0
Family Distribution by Income Level	93,068	25.3	15.3	17.7	41.7	0.0
Household Distribution by Income Level	136,870	26.3	14.4	16.2	43.1	0.0
Median Family Income - Augusta-Richmond County, GA-SC MSA		\$58,059	Median Housing Value			\$129,360
			Median Gross Rent			\$818
			Families Below Poverty Level			15.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 22 financial institutions operated 112 full-service branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> with 6.9 percent deposit market share.

## Gainesville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 203,136, and the number of census tracts increased to 50. Regarding housing costs, the median housing value increased to \$213,562, and the median gross rent increased to \$1,053.

Demographic Information for the Gainesville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	5.6	19.4	41.7	33.3	0.0
Population by Geography	187,916	6.1	18.9	42.3	32.8	0.0
Housing Units by Geography	69,302	5.4	16.2	45.4	33.0	0.0
Owner-Occupied Units by Geography	41,434	1.2	12.4	44.6	41.8	0.0
Occupied Rental Units by Geography	20,558	13.1	25.1	43.7	18.1	0.0
Vacant Units by Geography	7,310	7.3	12.4	55.0	25.3	0.0
Businesses by Geography	21,371	8.8	16.5	41.5	33.2	0.0
Farms by Geography	727	4.3	15.8	43.7	36.2	0.0
Family Distribution by Income Level	45,810	20.6	18.0	20.3	41.0	0.0
Household Distribution by Income Level	61,992	22.5	17.0	18.8	41.7	0.0
Median Family Income - Gainesville, GA MSA		\$58,558	Median Housing Value			\$161,600
			Median Gross Rent			\$908
			Families Below Poverty Level			14.3%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 38 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 23.3 percent deposit market share.

## Athens MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 215,415, and the number of census tracts increased to 58. Regarding housing costs, the median housing value increased to \$207,516, and the median gross rent increased to \$865.

Demographic Information for the Athens MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	15.2	17.4	34.8	30.4	2.2
Population by Geography	198,225	13.4	14.7	37.0	30.9	3.9
Housing Units by Geography	82,615	13.8	15.4	40.0	30.4	0.4
Owner-Occupied Units by Geography	38,534	6.4	14.7	41.1	37.8	0.0
Occupied Rental Units by Geography	32,439	21.1	15.1	39.3	23.7	0.9
Vacant Units by Geography	11,642	18.0	18.6	38.4	24.4	0.5
Businesses by Geography	21,588	10.6	10.2	34.8	43.4	1.0
Farms by Geography	1,037	4.8	17.8	37.3	39.7	0.3
Family Distribution by Income Level	41,405	25.2	15.0	17.8	42.0	0.0
Household Distribution by Income Level	70,973	27.6	14.4	15.1	43.0	0.0
Median Family Income - Athens-Clarke County, GA MSA	\$57,116	Median Housing Value				\$161,774
		Median Gross Rent				\$799
		Families Below Poverty Level				15.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 18 financial institutions operated 49 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 11.9 percent deposit market share.

## Macon MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 233,802, and the number of census tracts increased to 68. Regarding housing costs, the median housing value increased to \$126,685, and the median gross rent increased to \$813.

Demographic Information for the Macon MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	23.3	18.3	25.0	33.3	0.0
Population by Geography	231,517	16.2	20.8	24.6	38.5	0.0
Housing Units by Geography	102,025	16.8	20.8	25.6	36.8	0.0
Owner-Occupied Units by Geography	51,821	8.7	17.0	28.2	46.2	0.0
Occupied Rental Units by Geography	32,757	25.1	23.7	21.8	29.4	0.0
Vacant Units by Geography	17,447	25.3	26.6	25.2	22.9	0.0
Businesses by Geography	26,225	13.9	17.6	25.3	43.3	0.0
Farms by Geography	726	5.0	15.4	32.6	47.0	0.0
Family Distribution by Income Level	56,013	26.2	14.6	17.0	42.2	0.0
Household Distribution by Income Level	84,578	26.6	15.2	14.8	43.4	0.0
Median Family Income - Macon-Bibb County, GA MSA	\$51,727	Median Housing Value				\$115,380
		Median Gross Rent				\$726
		Families Below Poverty Level				19.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 22 financial institutions operated 47 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 27.5 percent deposit market share.

## Warner Robins MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 191,614, and the number of census tracts increased to 46. Regarding housing costs, the median housing value increased to \$142,157, and the median gross rent increased to \$909.

Demographic Information for the Warner Robins MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	27.6	51.7	13.8	0.0
Population by Geography	174,656	5.6	20.9	51.7	21.8	0.0
Housing Units by Geography	71,212	6.3	21.2	52.2	20.4	0.0
Owner-Occupied Units by Geography	41,617	2.4	17.0	52.4	28.3	0.0
Occupied Rental Units by Geography	22,095	11.3	27.0	53.3	8.4	0.0
Vacant Units by Geography	7,500	13.7	27.1	47.6	11.6	0.0
Businesses by Geography	17,216	4.9	18.5	54.8	21.8	0.0
Farms by Geography	575	2.8	23.8	53.2	20.2	0.0
Family Distribution by Income Level	44,734	23.0	15.6	20.7	40.8	0.0
Household Distribution by Income Level	63,712	24.1	15.8	18.0	42.1	0.0
Median Family Income - Warner Robins, GA MSA		\$61,780	Median Housing Value			\$125,305
			Median Gross Rent			\$825
			Families Below Poverty Level			14.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 11 financial institutions operated 30 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 19.8 percent deposit market share.



## Dalton MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. While the population remained stable at 142,837, the number of census tracts increased to 32. Regarding housing costs, the median housing value increased to \$132,741, and the median gross rent increased to \$726.

Demographic Information for the Dalton MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	19.2	53.8	26.9	0.0
Population by Geography	142,857	0.0	19.2	49.8	30.9	0.0
Housing Units by Geography	55,549	0.0	18.2	50.1	31.7	0.0
Owner-Occupied Units by Geography	31,866	0.0	16.1	50.2	33.8	0.0
Occupied Rental Units by Geography	16,945	0.0	21.1	49.6	29.3	0.0
Vacant Units by Geography	6,738	0.0	20.8	50.9	28.3	0.0
Businesses by Geography	9,955	0.0	16.5	52.3	31.2	0.0
Farms by Geography	331	0.0	10.3	57.1	32.6	0.0
Family Distribution by Income Level	35,878	20.4	19.5	20.0	40.2	0.0
Household Distribution by Income Level	48,811	21.9	18.0	17.8	42.2	0.0
Median Family Income - Dalton, GA MSA		\$47,062	Median Housing Value			\$113,247
			Median Gross Rent			\$664
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.</i> <i>Due to rounding, totals may not equal 100.0 percent.</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 9 financial institutions operated 26 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 28.9 percent deposit market share.

## Brunswick MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population slightly decreased to 113,495, but the number of census tracts increased to 39. Regarding housing costs, the median housing value increased to \$192,722, and the median gross rent increased to \$903.

Demographic Information for the Brunswick MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	33.3	29.2	12.5
Population by Geography	114,202	3.6	24.0	44.0	28.4	0.0
Housing Units by Geography	58,738	3.0	21.9	38.3	36.8	0.0
Owner-Occupied Units by Geography	29,079	1.3	19.6	42.2	36.8	0.0
Occupied Rental Units by Geography	15,109	6.5	33.8	37.9	21.7	0.0
Vacant Units by Geography	14,550	2.5	14.1	31.0	52.4	0.0
Businesses by Geography	13,367	6.1	26.1	25.4	42.4	0.0
Farms by Geography	399	2.8	18.5	36.8	41.9	0.0
Family Distribution by Income Level	30,332	22.5	16.0	19.6	41.8	0.0
Household Distribution by Income Level	44,188	25.1	15.3	17.6	42.0	0.0
Median Family Income - Brunswick, GA MSA		\$52,987	Median Housing Value			\$162,653
			Median Gross Rent			\$804
			Families Below Poverty Level			14.9%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 32 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 21.0 percent deposit market share.

## Albany MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, changes have occurred in the assessment area. Although, the total population slightly decreased to 148,922, the number of census tracts increased to 47. Regarding housing costs, the median housing value increased to \$110,376, and the median gross rent increased to \$761.

Demographic Information for the Albany MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	9.8	26.8	36.6	26.8	0.0
Population by Geography	152,625	8.2	26.9	32.9	32.0	0.0
Housing Units by Geography	64,684	7.6	29.6	34.3	28.5	0.0
Owner-Occupied Units by Geography	31,159	3.0	17.5	37.9	41.5	0.0
Occupied Rental Units by Geography	25,547	12.5	40.8	29.6	17.2	0.0
Vacant Units by Geography	7,978	10.1	40.7	35.2	13.9	0.0
Businesses by Geography	14,141	10.3	25.7	27.7	36.4	0.0
Farms by Geography	782	3.5	15.9	42.6	38.1	0.0
Family Distribution by Income Level	37,782	24.3	16.3	17.0	42.4	0.0
Household Distribution by Income Level	56,706	26.9	15.0	16.0	42.1	0.0
Median Family Income - Albany, GA MSA		\$44,297	Median Housing Value			\$100,482
			Median Gross Rent			\$702
			Families Below Poverty Level			21.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 35 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 10.5 percent deposit market share.

## Rome MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 98,584, and the number of census tracts increased to 26. Regarding housing costs, the median housing value increased to \$139,298, and the median gross rent increased to \$780.

Demographic Information for the Rome MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	30.0	40.0	25.0	0.0
Population by Geography	96,169	3.6	28.1	40.6	27.7	0.0
Housing Units by Geography	40,458	4.0	27.6	40.2	28.1	0.0
Owner-Occupied Units by Geography	21,182	1.4	19.4	44.0	35.2	0.0
Occupied Rental Units by Geography	13,692	7.1	40.0	35.0	17.9	0.0
Vacant Units by Geography	5,584	6.2	28.8	38.8	26.2	0.0
Businesses by Geography	8,614	3.3	42.1	31.9	22.6	0.0
Farms by Geography	282	2.1	21.3	39.7	36.9	0.0
Family Distribution by Income Level	23,513	22.3	17.5	18.9	41.3	0.0
Household Distribution by Income Level	34,874	25.4	15.4	16.3	42.8	0.0
Median Family Income - Rome, GA MSA		\$51,379	Median Housing Value			\$115,813
			Median Gross Rent			\$678
			Families Below Poverty Level			16.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 9 financial institutions operated 16 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 10.8 percent deposit market share.

## Valdosta MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 148,126, and the number of census tracts increased to 40. Regarding housing costs, the median housing value increased to \$125,567, and the median gross rent increased to \$816.

Demographic Information for the Valdosta MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	8.8	23.5	41.2	26.5	0.0
Population by Geography	143,291	7.6	24.7	39.9	27.8	0.0
Housing Units by Geography	59,022	8.0	26.0	39.9	26.1	0.0
Owner-Occupied Units by Geography	28,036	4.5	14.8	46.9	33.7	0.0
Occupied Rental Units by Geography	22,997	11.8	38.7	30.9	18.7	0.0
Vacant Units by Geography	7,989	9.4	28.9	41.2	20.5	0.0
Businesses by Geography	12,863	8.4	27.8	28.7	35.0	0.0
Farms by Geography	605	3.1	13.9	54.0	28.9	0.0
Family Distribution by Income Level	32,277	24.1	16.6	17.1	42.2	0.0
Household Distribution by Income Level	51,033	25.9	15.7	16.1	42.3	0.0
Median Family Income - Valdosta, GA MSA		\$47,592	Median Housing Value			\$116,564
			Median Gross Rent			\$735
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information-Valdosta

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operated 37 full-service branches within the assessment area. Of these institutions, Truist ranked 15<sup>th</sup> with 1.6 percent deposit market share.

## VIRGINIA

### Roanoke MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$200,196, and the median gross rent increased to \$847. Additionally, median family income increased to \$73,561.

Demographic Information for the Roanoke MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	65	4.6	20.0	49.2	26.2	0.0
Population by Geography	312,216	3.4	21.6	46.6	28.4	0.0
Housing Units by Geography	145,649	3.1	21.7	47.1	28.2	0.0
Owner-Occupied Units by Geography	88,893	1.4	18.4	47.5	32.7	0.0
Occupied Rental Units by Geography	39,871	6.5	28.4	45.5	19.6	0.0
Vacant Units by Geography	16,885	4.3	22.9	48.2	24.6	0.0
Businesses by Geography	30,673	2.8	15.0	49.7	32.6	0.0
Farms by Geography	1,068	1.8	17.6	48.1	32.5	0.0
Family Distribution by Income Level	83,580	19.9	17.5	22.4	40.2	0.0
Household Distribution by Income Level	128,764	24.1	16.1	19.1	40.8	0.0
Median Family Income - Roanoke, VA MSA		\$61,791	Median Housing Value			\$179,442
			Median Gross Rent			\$749
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 92 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 32.0 percent deposit market share.

## Charlottesville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$331,901, and the median gross rent increased to \$1,234. Additionally, median family income increased to \$95,708.

Demographic Information for the Charlottesville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	4.5	27.3	43.2	22.7	2.3
Population by Geography	208,002	4.4	22.8	47.0	23.9	1.8
Housing Units by Geography	91,983	4.3	23.3	48.9	23.4	0.1
Owner-Occupied Units by Geography	51,220	2.7	16.9	54.5	26.0	0.0
Occupied Rental Units by Geography	28,726	7.7	31.8	38.5	21.8	0.1
Vacant Units by Geography	12,037	3.3	30.5	50.2	16.0	0.0
Businesses by Geography	25,595	3.8	17.4	42.6	36.2	0.1
Farms by Geography	1,103	1.4	18.1	57.0	23.5	0.0
Family Distribution by Income Level	49,042	19.8	16.8	21.0	42.4	0.0
Household Distribution by Income Level	79,946	23.9	15.9	17.8	42.4	0.0
Median Family Income - Charlottesville, VA MSA		\$78,548	Median Housing Value			\$286,065
			Median Gross Rent			\$1,027
			Families Below Poverty Level			7.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 57 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 22.7 percent deposit market share.

## Lynchburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$178,186, and the median gross rent increased to \$826. Additionally, median family income increased to \$70,981.

Demographic Information for the Lynchburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	1.7	23.3	60.0	15.0	0.0
Population by Geography	256,989	1.9	18.4	61.1	18.6	0.0
Housing Units by Geography	114,007	2.1	18.8	62.3	16.9	0.0
Owner-Occupied Units by Geography	70,208	1.5	12.2	65.1	21.2	0.0
Occupied Rental Units by Geography	29,135	3.2	33.9	51.1	11.7	0.0
Vacant Units by Geography	14,664	2.7	19.8	70.9	6.5	0.0
Businesses by Geography	22,063	1.2	19.3	55.6	23.9	0.0
Farms by Geography	1,060	0.7	8.7	69.9	20.8	0.0
Family Distribution by Income Level	66,286	20.8	17.5	21.6	40.0	0.0
Household Distribution by Income Level	99,343	24.3	16.0	18.0	41.8	0.0
Median Family Income - Lynchburg, VA MSA		\$60,256	Median Housing Value			\$166,909
			Median Gross Rent			\$746
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 76 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 22.6 percent deposit market share.



## Harrisonburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$230,019, and the median gross rent increased to \$943. Additionally, median family income increased to \$72,527.

Demographic Information for the Harrisonburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	3.3	13.3	70.0	13.3	0.0
Population by Geography	129,173	4.6	15.1	66.3	14.0	0.0
Housing Units by Geography	52,211	3.5	15.2	69.2	12.1	0.0
Owner-Occupied Units by Geography	28,375	0.4	10.0	76.9	12.7	0.0
Occupied Rental Units by Geography	17,659	7.2	24.7	59.7	8.4	0.0
Vacant Units by Geography	6,177	7.1	12.0	61.4	19.5	0.0
Businesses by Geography	11,423	1.9	19.7	62.8	15.6	0.0
Farms by Geography	1,006	0.2	4.7	82.1	13.0	0.0
Family Distribution by Income Level	29,592	18.6	19.5	22.7	39.3	0.0
Household Distribution by Income Level	46,034	22.9	16.7	19.0	41.4	0.0
Median Family Income - Harrisonburg, VA MSA		\$60,539	Median Housing Value			\$208,004
			Median Gross Rent			\$884
			Families Below Poverty Level			9.6%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 41 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 27.4 percent deposit market share.

## Winchester MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$262,497, and the median gross rent increased to \$1,157. Additionally, median family income increased to \$83,355.

Demographic Information for the Winchester MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	15.8	57.9	26.3	0.0
Population by Geography	108,508	0.0	17.4	55.7	26.9	0.0
Housing Units by Geography	44,055	0.0	16.4	57.2	26.4	0.0
Owner-Occupied Units by Geography	27,768	0.0	10.7	57.9	31.5	0.0
Occupied Rental Units by Geography	12,295	0.0	28.5	54.7	16.8	0.0
Vacant Units by Geography	3,992	0.0	19.0	59.8	21.2	0.0
Businesses by Geography	11,790	0.0	17.6	55.9	26.4	0.0
Farms by Geography	446	0.0	10.1	64.6	25.3	0.0
Family Distribution by Income Level	27,783	19.7	16.3	19.5	44.5	0.0
Household Distribution by Income Level	40,063	18.6	16.3	16.2	48.9	0.0
Median Family Income - Winchester, VA-WV MSA		\$69,817	Median Housing Value			\$216,463
			Median Gross Rent			\$1,003
			Families Below Poverty Level			5.9%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 43 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 34.0 percent deposit market share.

## Staunton MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$203,019, and the median gross rent increased to \$887. Additionally, median family income increased to \$73,822.

Demographic Information for the Staunton MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	12.5	75.0	8.3	0.0
Population by Geography	119,396	1.1	12.0	79.6	7.4	0.0
Housing Units by Geography	53,374	1.2	11.0	81.0	6.8	0.0
Owner-Occupied Units by Geography	33,456	0.2	9.2	83.1	7.4	0.0
Occupied Rental Units by Geography	14,112	3.4	13.6	77.7	5.4	0.0
Vacant Units by Geography	5,806	1.1	15.2	77.1	6.6	0.0
Businesses by Geography	10,103	4.1	5.8	82.0	8.0	0.0
Farms by Geography	685	0.6	4.4	90.4	4.7	0.0
Family Distribution by Income Level	32,221	19.7	18.4	22.7	39.2	0.0
Household Distribution by Income Level	47,568	22.9	17.4	18.9	40.8	0.0
Median Family Income - Staunton, VA MSA		\$60,603	Median Housing Value			\$184,989
			Median Gross Rent			\$800
			Families Below Poverty Level			8.9%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 33 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 15.8 percent deposit market share.

## Blacksburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. Regarding housing costs, the median housing value increased to \$203,148, and the median gross rent increased to \$927. Additionally, median family income increased to \$74,841.

Demographic Information for the Blacksburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	3.0	66.7	18.2	12.1
Population by Geography	164,959	0.0	4.6	65.8	21.1	8.6
Housing Units by Geography	71,128	0.0	3.8	72.6	21.6	2.0
Owner-Occupied Units by Geography	37,403	0.0	1.1	76.7	21.6	0.6
Occupied Rental Units by Geography	25,122	0.0	7.8	64.5	23.8	3.9
Vacant Units by Geography	8,603	0.0	3.9	78.1	15.3	2.7
Businesses by Geography	11,870	0.0	1.8	69.9	26.6	1.8
Farms by Geography	473	0.0	0.4	72.3	26.2	1.1
Family Distribution by Income Level	36,114	18.4	18.1	21.7	41.9	0.0
Household Distribution by Income Level	62,525	27.3	13.3	17.9	41.5	0.0
Median Family Income - Blacksburg-Christiansburg, VA MSA		\$60,971	Median Housing Value			\$179,995
			Median Gross Rent			\$780
			Families Below Poverty Level			9.2%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 49 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 12.8 percent deposit market share.

## MARYLAND

### MD Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 45, and there are no low-income census tracts within the assessment area. Regarding housing costs, the median housing value increased to \$263,852, and the median gross rent increased to \$941. The number of businesses increased 20,446.

Demographic Information for the MD Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	14.0	65.1	11.6	7.0
Population by Geography	152,730	2.6	15.6	71.6	10.3	0.0
Housing Units by Geography	79,906	2.4	13.9	72.6	11.1	0.0
Owner-Occupied Units by Geography	42,557	1.0	11.7	74.8	12.4	0.0
Occupied Rental Units by Geography	18,346	6.7	24.3	61.0	8.0	0.0
Vacant Units by Geography	19,003	1.4	8.6	78.8	11.1	0.0
Businesses by Geography	15,842	1.3	17.4	66.3	15.0	0.0
Farms by Geography	1,229	0.2	9.5	79.6	10.7	0.0
Family Distribution by Income Level	41,320	21.1	17.5	21.2	40.2	0.0
Household Distribution by Income Level	60,903	24.6	15.9	17.3	42.2	0.0
Median Family Income Non-MSAs - MD		\$63,535	Median Housing Value			\$241,947
			Median Gross Rent			\$884
			Families Below Poverty Level			9.8%

Source: 2015 ACS and 2021 D&B Data.

Due to rounding, totals may not equal 100.0 percent.

(\*) The NA category consists of geographies that have not been assigned an income classification.

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 62 full-service branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> with 6.8 percent deposit market share.

## Salisbury MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 46. Regarding housing costs, the median housing value increased to \$228,238, and the median gross rent increased to \$1,015. The number of businesses increased to 20,758.

Demographic Information for the Salisbury MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	2.3	20.5	40.9	27.3	9.1
Population by Geography	178,681	1.8	24.1	41.7	29.9	2.5
Housing Units by Geography	108,615	1.6	17.1	45.4	35.9	0.0
Owner-Occupied Units by Geography	44,124	1.6	14.2	46.5	37.6	0.0
Occupied Rental Units by Geography	22,023	2.7	40.7	40.4	16.1	0.0
Vacant Units by Geography	42,468	1.1	7.8	46.7	44.3	0.0
Businesses by Geography	18,028	1.1	15.4	50.7	32.8	0.1
Farms by Geography	812	0.6	15.8	47.0	36.2	0.4
Family Distribution by Income Level	43,154	22.1	17.3	20.1	40.5	0.0
Household Distribution by Income Level	66,147	25.5	16.6	16.8	41.1	0.0
Median Family Income - Salisbury, MD-DE MSA		\$63,091	Median Housing Value			\$217,196
			Median Gross Rent			\$961
			Families Below Poverty Level			11.1%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 73 full-service branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> with 9.3 percent deposit market share.

## California MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 113,777, and the number of census tracts increased to 23. Additionally, there are no low-income census tracts within the assessment area. Regarding housing costs, the median housing value increased to \$309,577, and the median gross rent increased to \$1,441. The number of businesses increased to 9,180.

Demographic Information for the California MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	5.6	16.7	55.6	16.7	5.6
Population by Geography	109,614	4.7	12.7	65.5	17.0	0.0
Housing Units by Geography	42,762	5.1	13.0	63.3	18.6	0.0
Owner-Occupied Units by Geography	27,650	2.7	8.6	67.7	21.0	0.0
Occupied Rental Units by Geography	10,593	11.3	23.0	52.8	12.8	0.0
Vacant Units by Geography	4,519	5.4	16.5	61.1	17.0	0.0
Businesses by Geography	7,946	5.8	10.1	63.4	20.7	0.0
Farms by Geography	304	2.6	9.9	69.1	18.4	0.0
Family Distribution by Income Level	27,741	20.1	16.9	24.6	38.3	0.0
Household Distribution by Income Level	38,243	23.4	15.0	22.0	39.5	0.0
Median Family Income - California-Lexington Park, MD MSA		\$98,260	Median Housing Value			\$296,234
			Median Gross Rent			\$1,279
			Families Below Poverty Level			6.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 7 financial institutions operated 16 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 10.1 percent deposit market share.

## Wilmington MD Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 21. Regarding housing costs, the median housing value increased to \$252,218, and the median gross rent increased to \$1,155. The number of businesses increased to 8,111.

Demographic Information for the Wilmington MD Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	5.3	73.7	15.8	0.0
Population by Geography	101,960	5.3	3.7	75.3	15.6	0.0
Housing Units by Geography	42,030	4.7	3.4	77.4	14.6	0.0
Owner-Occupied Units by Geography	27,019	2.3	3.3	75.7	18.8	0.0
Occupied Rental Units by Geography	9,709	11.7	4.8	79.4	4.2	0.0
Vacant Units by Geography	5,302	4.2	1.3	82.4	12.1	0.0
Businesses by Geography	7,150	9.4	4.7	71.6	14.3	0.0
Farms by Geography	407	1.5	2.5	73.7	22.4	0.0
Family Distribution by Income Level	26,327	20.9	18.1	22.4	38.5	0.0
Household Distribution by Income Level	36,728	23.2	15.5	19.7	41.7	0.0
Median Family Income - Wilmington, DE-MD-NJ		\$80,707	Median Housing Value			\$237,015
			Median Gross Rent			\$1,003
			Families Below Poverty Level			6.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 7 financial institutions operated 15 full-service branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> with 2.4 percent deposit market share.



## TEXAS

### Fort Worth MD Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 2,507,421 and the number of census tracts increased to 533. Regarding housing costs, the median housing value increased to \$213,350 and the median gross rent increased to \$1,159.

Demographic Information for the Fort Worth MD Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	415	11.6	24.3	35.7	28.2	0.2
Population by Geography	2,252,637	8.8	22.6	36.6	32.0	0.0
Housing Units by Geography	862,790	8.7	22.7	37.2	31.4	0.0
Owner-Occupied Units by Geography	499,666	4.4	17.2	38.9	39.5	0.0
Occupied Rental Units by Geography	291,605	14.3	30.7	35.1	19.8	0.0
Vacant Units by Geography	71,519	15.4	28.1	34.1	22.4	0.0
Businesses by Geography	230,341	5.8	19.2	30.8	44.1	0.1
Farms by Geography	4,924	3.0	14.4	37.9	44.8	0.0
Family Distribution by Income Level	555,713	22.6	16.7	19.5	41.3	0.0
Household Distribution by Income Level	791,271	23.6	16.5	18.3	41.6	0.0
Median Family Income - Fort Worth-Arlington-Grapevine, TX MD		\$69,339	Median Housing Value			\$153,381
			Median Gross Rent			\$943
			Families Below Poverty Level			11.0%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 79 financial institutions operated 496 full-service branches within the assessment area. Of these institutions, Truist ranked 20<sup>th</sup> with 0.8 percent deposit market share.

## San Antonio MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 2,558,143 and the number of census tracts increased to 501. Regarding housing costs, the median housing value increased to \$199,344, and the median gross rent increased to \$1,061.

Demographic Information for the San Antonio MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	457	7.4	30.9	30.0	30.9	0.9
Population by Geography	2,286,702	6.2	28.8	31.4	33.6	0.0
Housing Units by Geography	857,732	5.8	28.4	32.4	33.4	0.0
Owner-Occupied Units by Geography	486,051	4.1	22.3	31.9	41.6	0.0
Occupied Rental Units by Geography	293,330	8.0	37.4	32.0	22.7	0.0
Vacant Units by Geography	78,351	8.5	32.2	36.8	22.5	0.0
Businesses by Geography	197,213	4.0	19.0	30.6	46.2	0.2
Farms by Geography	4,916	1.8	12.8	35.2	50.3	0.0
Family Distribution by Income Level	539,835	22.3	17.3	19.2	41.2	0.0
Household Distribution by Income Level	779,381	24.3	15.9	17.8	42.0	0.0
Median Family Income - San Antonio-New Braunfels, TX MSA		\$62,228	Median Housing Value			\$151,851
			Median Gross Rent			\$895
			Families Below Poverty Level			12.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 63 financial institutions operated 395 full-service branches within the assessment area. Of these institutions, Truist ranked 23rd with 0.2 percent deposit market share.

## College Station MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 268,248 and the number of census tracts increased to 76. Regarding housing costs, the median housing value increased to \$185,840, and the median gross rent increased to \$972.

Demographic Information for College Station MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	11.5	25.0	34.6	25.0	3.8
Population by Geography	239,096	10.4	29.7	30.4	25.7	3.8
Housing Units by Geography	99,298	12.2	28.5	33.6	25.7	0.0
Owner-Occupied Units by Geography	42,528	2.4	21.4	36.8	39.3	0.0
Occupied Rental Units by Geography	43,796	21.4	37.0	27.1	14.6	0.0
Vacant Units by Geography	12,974	13.2	23.5	44.8	18.5	0.0
Businesses by Geography	17,600	6.8	22.2	33.0	37.7	0.3
Farms by Geography	737	3.7	13.6	43.3	39.5	0.0
Family Distribution by Income Level	49,315	24.3	16.3	17.7	41.8	0.0
Household Distribution by Income Level	86,324	27.1	14.1	15.0	43.8	0.0
Median Family Income - College Station-Bryan, TX MSA	\$60,756	Median Housing Value				\$143,645
					Median Gross Rent	\$865
					Families Below Poverty Level	14.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 26 financial institutions operated 75 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 12.7 percent deposit market share.

## Midland MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 175,220 and the number of census tracts increased to 39. Regarding housing costs, the median housing value increased to \$236,822 and the median gross rent increased to \$1,195.

Demographic Information for the Midland MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	17.2	48.3	27.6	3.4
Population by Geography	156,542	3.0	16.7	47.0	33.3	0.0
Housing Units by Geography	58,621	2.6	13.8	47.4	36.1	0.0
Owner-Occupied Units by Geography	36,680	2.7	12.9	43.7	40.6	0.0
Occupied Rental Units by Geography	17,820	1.8	15.4	54.9	27.9	0.0
Vacant Units by Geography	4,121	5.2	14.8	48.2	31.9	0.0
Businesses by Geography	19,584	1.4	21.8	36.4	39.8	0.6
Farms by Geography	539	0.4	15.4	40.3	43.6	0.4
Family Distribution by Income Level	37,873	21.9	17.5	20.2	40.4	0.0
Household Distribution by Income Level	54,500	23.4	16.8	17.5	42.3	0.0
Median Family Income - Midland, TX MSA		\$82,297	Median Housing Value			\$175,383
			Median Gross Rent			\$1,075
			Families Below Poverty Level			6.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 45 full-service branches within the assessment area. Of these institutions, Truist ranked 13th with 1.3 percent deposit market share.

## Odessa MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 165,171, and the number of census tracts increased to 33. Regarding housing costs, the median housing value increased to \$155,459 and the median gross rent increased to \$1,054.

Demographic Information for the Odessa MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	21.4	42.9	32.1	0.0
Population by Geography	149,557	2.2	22.3	40.7	34.8	0.0
Housing Units by Geography	55,357	2.3	22.3	39.1	36.3	0.0
Owner-Occupied Units by Geography	33,733	1.6	21.4	42.7	34.3	0.0
Occupied Rental Units by Geography	17,135	3.5	23.5	31.8	41.1	0.0
Vacant Units by Geography	4,489	3.0	24.8	39.7	32.5	0.0
Businesses by Geography	12,024	1.4	21.1	32.9	44.5	0.0
Farms by Geography	174	1.1	13.2	27.0	58.6	0.0
Family Distribution by Income Level	36,204	21.8	17.3	20.5	40.4	0.0
Household Distribution by Income Level	50,868	24.1	16.3	17.5	42.0	0.0
Median Family Income - Odessa, TX MSA	\$64,450	Median Housing Value				\$112,941
		Median Gross Rent				\$901
		Families Below Poverty Level				11.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operated 37 full-service branches within the assessment area. Of these institutions, Truist ranked 10th with 4.1 percent deposit market share.

## PENNSYLVANIA

### Reading MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 428,849, and the number of census tracts increased to 107. Regarding housing costs, the median housing value increased to \$178,222, and the median gross rent increased to \$954.

Demographic Information for the Reading MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	21.1	7.8	53.3	17.8	0.0
Population by Geography	413,965	15.5	5.5	55.7	23.3	0.0
Housing Units by Geography	164,853	15.9	5.3	56.1	22.7	0.0
Owner-Occupied Units by Geography	110,223	7.1	4.1	61.1	27.7	0.0
Occupied Rental Units by Geography	43,089	33.2	7.7	46.4	12.7	0.0
Vacant Units by Geography	11,541	34.9	8.0	44.0	13.1	0.0
Businesses by Geography	34,366	11.5	5.1	56.2	27.2	0.0
Farms by Geography	1,460	2.1	1.2	68.6	28.1	0.0
Family Distribution by Income Level	105,998	21.4	17.2	21.4	40.1	0.0
Household Distribution by Income Level	153,312	24.3	15.8	18.3	41.6	0.0
Median Family Income - Reading, PA MSA		\$67,696	Median Housing Value			\$157,955
			Median Gross Rent			\$836
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 98 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 7.8 percent deposit market share.

## York MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 456,438, and the number of census tracts increased to 108. Regarding housing costs, the median housing value increased to \$180,125, and the median gross rent increased to \$963.

Demographic Information for the York MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	14.4	7.8	61.1	16.7	0.0
Population by Geography	439,660	7.9	6.5	68.0	17.6	0.0
Housing Units by Geography	180,237	8.3	7.0	68.5	16.2	0.0
Owner-Occupied Units by Geography	124,269	3.3	6.2	70.9	19.6	0.0
Occupied Rental Units by Geography	43,147	19.8	9.2	63.9	7.0	0.0
Vacant Units by Geography	12,821	17.9	7.4	60.6	14.1	0.0
Businesses by Geography	36,511	9.6	6.7	65.5	18.2	0.0
Farms by Geography	1,532	1.8	4.0	74.9	19.3	0.0
Family Distribution by Income Level	116,539	19.5	18.4	22.3	39.9	0.0
Household Distribution by Income Level	167,416	22.6	16.9	19.6	40.9	0.0
Median Family Income - York-Hanover, PA MSA	\$69,846	Median Housing Value				\$165,790
		Median Gross Rent				\$845
		Families Below Poverty Level				7.8%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 104 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 11.3 percent deposit market share.

## Harrisburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 591,712, and the number of census tracts increased to 132. Regarding housing costs, the median housing value increased to \$187,525, and the median gross rent increased to \$984.

Demographic Information for the Harrisburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	8.9	21.8	49.2	18.5	1.6
Population by Geography	558,198	6.0	16.4	53.9	22.5	1.1
Housing Units by Geography	244,105	6.7	17.8	54.2	21.2	0.0
Owner-Occupied Units by Geography	151,653	2.7	12.2	58.5	26.6	0.0
Occupied Rental Units by Geography	72,005	12.7	26.6	47.6	13.1	0.0
Vacant Units by Geography	20,447	15.7	28.4	46.1	9.9	0.0
Businesses by Geography	57,305	5.8	18.9	52.6	22.7	0.0
Farms by Geography	1,775	1.4	8.6	68.4	21.6	0.0
Family Distribution by Income Level	144,257	19.7	18.3	22.0	40.0	0.0
Household Distribution by Income Level	223,658	22.1	17.0	19.5	41.4	0.0
Median Family Income - Harrisburg-Carlisle, PA MSA	\$71,723	Median Housing Value				\$168,004
		Median Gross Rent				\$858
		Families Below Poverty Level				7.5%
<p>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 26 financial institutions operated 148 full-service branches within the assessment area. Of these institutions, Truist ranked 15th with 1.8 percent deposit market share.



## PA Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population decreased to 336,565, and the number of census tracts increased to 90. Regarding housing costs, the median housing value increased to \$122,581, and the median gross rent increased to \$698.

Demographic Information for the PA Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	0.0	14.0	73.3	11.6	1.2
Population by Geography	344,192	0.0	10.7	76.3	12.5	0.6
Housing Units by Geography	161,328	0.0	12.8	75.2	12.0	0.0
Owner-Occupied Units by Geography	103,325	0.0	8.9	77.0	14.1	0.0
Occupied Rental Units by Geography	35,006	0.0	19.2	71.8	8.9	0.1
Vacant Units by Geography	22,997	0.0	20.3	72.3	7.4	0.0
Businesses by Geography	23,673	0.0	11.0	74.0	14.9	0.1
Farms by Geography	1,400	0.0	1.5	80.2	18.3	0.0
Family Distribution by Income Level	91,483	19.0	18.9	21.6	40.5	0.0
Household Distribution by Income Level	138,331	23.1	17.0	17.7	42.1	0.0
Median Family Income Non-MSAs - PA		\$56,172	Median Housing Value			\$109,240
			Median Gross Rent			\$635
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 28 financial institutions operated 104 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 8.7 percent deposit market share.

## Chambersburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 155,932, and the number of census tracts increased to 33. Regarding housing costs, the median housing value increased to \$186,775, and the median gross rent increased to \$912.

Demographic Information for the Chambersburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	14.8	74.1	7.4	0.0
Population by Geography	152,285	3.7	9.0	78.4	8.9	0.0
Housing Units by Geography	63,947	3.5	9.9	78.5	8.2	0.0
Owner-Occupied Units by Geography	42,014	1.4	6.5	82.7	9.4	0.0
Occupied Rental Units by Geography	16,556	8.1	18.0	67.7	6.2	0.0
Vacant Units by Geography	5,377	5.0	11.6	78.7	4.7	0.0
Businesses by Geography	11,603	4.9	8.1	79.2	7.8	0.0
Farms by Geography	806	1.0	2.7	89.5	6.8	0.0
Family Distribution by Income Level	40,598	18.6	19.9	22.3	39.2	0.0
Household Distribution by Income Level	58,570	21.3	17.6	19.7	41.4	0.0
Median Family Income - Chambersburg-Waynesboro, PA MSA		\$64,527	Median Housing Value			\$174,521
			Median Gross Rent			\$805
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0 percent. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 41 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 13.7 percent deposit market share.

## Scranton MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 567,559. Regarding housing costs, the median housing value increased to \$137,358, and the median gross rent increased to \$792.

Demographic Information for the Scranton MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	51,264	2.8	19.4	51.2	24.6	2.1
Farms by Geography	1,182	1.8	10.4	54.1	33.5	0.3
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
Median Family Income - Scranton--Wilkes-Barre, PA MSA	\$59,887	Median Housing Value				\$130,472
		Median Gross Rent				\$710
		Families Below Poverty Level				11.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 21 financial institutions operated 181 full-service branches within the assessment area. Of these institutions, Truist ranked 12th with 2 percent deposit market share.

## Gettysburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 103,852. Regarding housing costs, the median housing value increased to \$211,016, and the median gross rent increased to \$943.

Demographic Information for the Gettysburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	4.3	82.6	13.0	0.0
Population by Geography	101,767	0.0	4.1	83.7	12.2	0.0
Housing Units by Geography	41,235	0.0	4.8	83.2	12.0	0.0
Owner-Occupied Units by Geography	29,536	0.0	2.2	83.9	13.9	0.0
Occupied Rental Units by Geography	8,657	0.0	13.2	81.2	5.7	0.0
Vacant Units by Geography	3,042	0.0	6.2	81.8	12.0	0.0
Businesses by Geography	8,398	0.0	10.9	77.7	11.4	0.0
Farms by Geography	606	0.0	1.3	82.7	16.0	0.0
Family Distribution by Income Level	27,376	17.9	18.6	24.3	39.3	0.0
Household Distribution by Income Level	38,193	22.2	17.0	21.3	39.5	0.0
Median Family Income - Gettysburg, PA MSA		\$70,344	Median Housing Value			\$195,911
			Median Gross Rent			\$834
			Families Below Poverty Level			5.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 4 financial institutions operated 21 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 4.4 percent deposit market share.

## Lebanon MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 143,257. Regarding housing costs, the median housing value increased to \$175,723, and the median gross rent increased to \$898.

Demographic Information for the Lebanon MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	64.5	12.9	0.0
Population by Geography	135,776	3.5	17.9	62.3	16.3	0.0
Housing Units by Geography	56,017	3.0	19.4	61.0	16.6	0.0
Owner-Occupied Units by Geography	36,836	1.3	12.1	67.8	18.8	0.0
Occupied Rental Units by Geography	15,431	6.6	36.1	44.7	12.6	0.0
Vacant Units by Geography	3,750	5.4	23.1	60.4	11.1	0.0
Businesses by Geography	9,950	1.4	18.0	61.6	19.0	0.0
Farms by Geography	571	0.0	4.2	78.1	17.7	0.0
Family Distribution by Income Level	35,976	18.0	19.0	24.8	38.1	0.0
Household Distribution by Income Level	52,267	22.0	17.1	20.7	40.3	0.0
Median Family Income - Lebanon, PA MSA		\$65,676	Median Housing Value			\$159,492
			Median Gross Rent			\$793
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 11 financial institutions operated 34 full-service branches within the assessment area. Of these institutions, Truist ranked 10th with 1.6 percent deposit market share.

## Williamsport MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population decreased to 114,188. Regarding housing costs, the median housing value increased to \$157,880, and the median gross rent increased to \$806.

Demographic Information for the Williamsport MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	6.9	13.8	72.4	6.9	0.0
Population by Geography	116,656	5.8	11.7	75.9	6.6	0.0
Housing Units by Geography	52,641	5.2	11.5	76.8	6.4	0.0
Owner-Occupied Units by Geography	32,187	1.4	7.2	84.3	7.0	0.0
Occupied Rental Units by Geography	13,719	12.9	19.7	61.3	6.2	0.0
Vacant Units by Geography	6,735	7.9	15.6	72.9	3.7	0.0
Businesses by Geography	9,885	5.0	16.2	71.6	7.2	0.0
Farms by Geography	421	1.2	4.0	90.3	4.5	0.0
Family Distribution by Income Level	29,537	20.0	18.7	22.1	39.2	0.0
Household Distribution by Income Level	45,906	23.7	16.5	17.6	42.1	0.0
Median Family Income - Williamsport, PA MSA		\$60,191	Median Housing Value			\$135,328
			Median Gross Rent			\$719
			Families Below Poverty Level			10.2%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 12 financial institutions operated 45 full-service branches within the assessment area. Of these institutions, Truist ranked 7th with 6.6 percent deposit market share.

## State College MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank assessment area. The total population increased to 158,172, and the number of census tracts increased to 41. Regarding housing costs, the median housing value increased to \$252,762, and the median gross rent increased to \$1,017.

Demographic Information for the State College MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	19.4	38.7	25.8	12.9
Population by Geography	157,823	3.3	20.9	40.6	22.9	12.2
Housing Units by Geography	64,489	0.2	24.5	44.4	24.0	6.9
Owner-Occupied Units by Geography	34,606	0.0	16.0	51.7	31.5	0.8
Occupied Rental Units by Geography	22,577	0.5	36.1	33.4	15.0	15.1
Vacant Units by Geography	7,306	0.4	28.6	43.3	16.5	11.1
Businesses by Geography	12,595	1.6	18.3	38.5	31.9	9.6
Farms by Geography	501	0.2	16.0	55.7	27.1	1.0
Family Distribution by Income Level	32,532	19.6	18.5	21.5	40.3	0.0
Household Distribution by Income Level	57,183	25.5	15.5	16.4	42.5	0.0
Median Family Income - State College, PA MSA		\$74,118	Median Housing Value			\$208,908
			Median Gross Rent			\$927
			Families Below Poverty Level			6.5%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operating 45 full-service branches within the assessment area. Of these institutions, Truist ranked 4th with 7.3 percent deposit market share.

## East Stroudsburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 168,327, and the number of census tracts increased to 51. Regarding housing costs, the median housing value decreased to \$177,020, and the median gross rent increased to \$1,130.

Demographic Information for the East Stroudsburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	15.2	78.8	6.1	0.0
Population by Geography	167,881	0.0	11.2	83.4	5.3	0.0
Housing Units by Geography	80,632	0.0	13.8	81.8	4.4	0.0
Owner-Occupied Units by Geography	44,899	0.0	8.0	86.4	5.6	0.0
Occupied Rental Units by Geography	12,398	0.0	26.6	69.5	3.9	0.0
Vacant Units by Geography	23,335	0.0	18.1	79.5	2.4	0.0
Businesses by Geography	14,655	0.0	18.2	76.5	5.3	0.0
Farms by Geography	380	0.0	6.8	82.1	11.1	0.0
Family Distribution by Income Level	41,743	20.7	18.1	21.3	39.9	0.0
Household Distribution by Income Level	57,297	23.1	16.4	19.4	41.1	0.0
Median Family Income - East Stroudsburg, PA MSA		\$66,783	Median Housing Value			\$177,261
			Median Gross Rent			\$1,029
			Families Below Poverty Level			9.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operating 43 full-service branches within the assessment area. Of these institutions, Truist ranked 10th with 1.5 percent deposit market share.



## SOUTH CAROLINA

### Spartanburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 327,997 and the number of census tracts increased to 87. Regarding housing costs, the median housing value increased to \$149,727 and the median gross rent increased to \$809.

Demographic Information for the Spartanburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	8.7	24.6	40.6	26.1	0.0
Population by Geography	291,240	4.8	20.8	43.6	30.8	0.0
Housing Units by Geography	123,931	5.3	21.5	43.8	29.4	0.0
Owner-Occupied Units by Geography	75,378	2.3	15.6	47.1	35.1	0.0
Occupied Rental Units by Geography	34,514	10.7	31.1	38.8	19.5	0.0
Vacant Units by Geography	14,039	8.7	29.8	38.3	23.2	0.0
Businesses by Geography	18,668	2.4	20.8	40.2	36.7	0.0
Farms by Geography	566	1.1	16.1	45.8	37.1	0.0
Family Distribution by Income Level	76,454	21.0	17.4	18.9	42.7	0.0
Household Distribution by Income Level	109,892	23.6	15.6	17.3	43.5	0.0
Median Family Income - Spartanburg, SC MSA	\$53,959	Median Housing Value				\$122,515
		Median Gross Rent				\$695
		Families Below Poverty Level				13.5%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 17 financial institutions operated 56 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 26.7 percent deposit market share.

## Hilton Head Island MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 215,908, and the number of census tracts increased to 50. Regarding housing costs, the median housing value increased to \$335,941, and the median gross rent increased to \$1,270.

Demographic Information for the Hilton Head Island MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	32.6	34.8	28.3	4.3
Population by Geography	197,969	0.0	36.4	43.6	20.0	0.0
Housing Units by Geography	104,587	0.0	29.6	40.5	29.8	0.0
Owner-Occupied Units by Geography	52,635	0.0	27.1	45.1	27.8	0.0
Occupied Rental Units by Geography	22,435	0.0	42.1	43.2	14.7	0.0
Vacant Units by Geography	29,517	0.0	24.7	30.4	45.0	0.0
Businesses by Geography	18,343	0.0	25.6	48.2	26.2	0.0
Farms by Geography	536	0.0	36.4	46.6	17.0	0.0
Family Distribution by Income Level	51,146	20.1	19.5	20.0	40.4	0.0
Household Distribution by Income Level	75,070	22.3	17.5	18.3	41.9	0.0
Median Family Income - Hilton Head Island-Bluffton, SC MSA		\$63,345	Median Housing Value			\$292,927
			Median Gross Rent			\$1,026
			Families Below Poverty Level			9.7%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 20 financial institutions operated 57 full-service branches within the assessment area. Of these institutions, Truist ranked 5<sup>th</sup> with 10.6 percent deposit market share.

## SC Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population decreased to 330,644, and the number of census tracts increased to 114. Regarding housing costs, the median housing value increased to \$155,874 and the median gross rent increased to \$743.

Demographic Information for the SC Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	76	0.0	11.8	57.9	27.6	2.6
Population by Geography	332,158	0.0	10.7	61.4	27.9	0.0
Housing Units by Geography	167,404	0.0	9.1	58.0	32.8	0.0
Owner-Occupied Units by Geography	93,875	0.0	8.2	60.4	31.4	0.0
Occupied Rental Units by Geography	34,251	0.0	15.0	60.1	24.9	0.0
Vacant Units by Geography	39,278	0.0	6.1	50.5	43.3	0.0
Businesses by Geography	20,110	0.0	9.7	55.0	35.3	0.0
Farms by Geography	928	0.0	8.3	67.1	24.6	0.0
Family Distribution by Income Level	86,164	19.8	17.2	17.7	45.3	0.0
Household Distribution by Income Level	128,126	22.5	15.0	16.8	45.7	0.0
Median Family Income Non-MSAs - SC		\$44,609	Median Housing Value			\$136,686
			Median Gross Rent			\$685
			Families Below Poverty Level			16.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 25 financial institutions operated 87 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 8.9 percent deposit market share.

## Florence MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population decreased to 199,964, and the number of census tracts increased to 55. Regarding housing costs, the median housing value increased to \$117,314 and the median gross rent increased to \$743.

Demographic Information for the Florence MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	4.1	22.4	46.9	24.5	2.0
Population by Geography	206,252	2.9	20.3	49.3	27.5	0.0
Housing Units by Geography	89,255	3.3	21.0	48.1	27.6	0.0
Owner-Occupied Units by Geography	52,231	1.3	16.5	51.9	30.3	0.0
Occupied Rental Units by Geography	26,033	5.9	27.1	41.7	25.3	0.0
Vacant Units by Geography	10,991	6.3	27.9	45.6	20.2	0.0
Businesses by Geography	12,164	3.6	24.3	40.3	31.7	0.1
Farms by Geography	405	0.2	15.8	57.3	26.7	0.0
Family Distribution by Income Level	53,667	23.5	16.2	19.9	40.4	0.0
Household Distribution by Income Level	78,264	25.8	15.6	16.4	42.2	0.0
Median Family Income - Florence, SC MSA		\$50,944	Median Housing Value			\$108,979
			Median Gross Rent			\$646
			Families Below Poverty Level			16.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 16 financial institutions operated 55 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 9.8 percent deposit market share.

## Sumter MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population decreased to 136,700 and the number of census tracts increased to 38. Regarding housing costs, the median housing value increased to \$117,629 and the median gross rent increased to \$774.

Demographic Information for the Sumter MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	25.7	51.4	20.0	2.9
Population by Geography	141,955	0.0	23.3	50.4	25.3	1.0
Housing Units by Geography	64,100	0.0	24.2	50.8	24.9	0.0
Owner-Occupied Units by Geography	36,114	0.0	16.8	53.8	29.4	0.0
Occupied Rental Units by Geography	17,618	0.0	37.9	45.2	16.9	0.0
Vacant Units by Geography	10,368	0.0	27.0	50.0	23.1	0.0
Businesses by Geography	8,142	0.0	34.2	45.0	20.8	0.0
Farms by Geography	395	0.0	18.0	70.4	11.6	0.0
Family Distribution by Income Level	36,579	21.7	19.0	19.2	40.1	0.0
Household Distribution by Income Level	53,732	24.1	16.4	18.4	41.1	0.0
Median Family Income - Sumter, SC MSA	\$47,323	Median Housing Value		\$102,951		
		Median Gross Rent		\$730		
		Families Below Poverty Level		15.5%		
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 18 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 6.3 percent deposit market share.

## TENNESSEE

### TN Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Regarding housing costs, the median housing value increased to \$149,274, and the median gross rent increased to \$713. Additionally, median family income increased to \$56,418.

Demographic Information for the TN Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	84	0.0	7.1	76.2	15.5	1.2
Population by Geography	398,205	0.0	7.0	75.7	17.3	0.0
Housing Units by Geography	197,295	0.0	6.7	76.9	16.3	0.0
Owner-Occupied Units by Geography	112,192	0.0	4.5	77.2	18.3	0.0
Occupied Rental Units by Geography	43,331	0.0	13.0	72.5	14.5	0.0
Vacant Units by Geography	41,772	0.0	6.2	80.7	13.0	0.0
Businesses by Geography	27,620	0.0	10.9	72.5	16.6	0.0
Farms by Geography	1,308	0.0	5.3	80.6	14.1	0.0
Family Distribution by Income Level	107,847	19.0	18.3	20.5	42.2	0.0
Household Distribution by Income Level	155,523	21.8	16.1	18.1	43.9	0.0
Median Family Income Non-MSAs - TN		\$46,066	Median Housing Value			\$123,845
			Median Gross Rent			\$639
			Families Below Poverty Level			13.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 34 financial institutions operated 138 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 6.3 percent deposit market share.

## Johnson City MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Regarding housing costs, the median housing value increased to \$156,362, and the median gross rent increased to \$721. Additionally, median family income increased to \$60,890.

Demographic Information for the Johnson City MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	0.0	31.8	50.0	15.9	2.3
Population by Geography	200,327	0.0	25.9	52.2	20.9	1.0
Housing Units by Geography	95,100	0.0	27.4	52.5	20.1	0.0
Owner-Occupied Units by Geography	57,246	0.0	23.8	54.0	22.2	0.0
Occupied Rental Units by Geography	26,714	0.0	32.1	49.6	18.3	0.0
Vacant Units by Geography	11,140	0.0	35.2	51.6	13.2	0.0
Businesses by Geography	13,317	0.0	22.7	43.8	33.1	0.4
Farms by Geography	440	0.0	18.9	56.8	24.3	0.0
Family Distribution by Income Level	54,064	21.9	17.0	21.6	39.6	0.0
Household Distribution by Income Level	83,960	25.4	15.5	17.1	41.9	0.0
Median Family Income - Johnson City, TN MSA		\$50,296	Median Housing Value			\$130,790
			Median Gross Rent			\$642
			Families Below Poverty Level			14.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 18 financial institutions operated 52 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 15.0 percent deposit market share.

## Morristown MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Regarding housing costs, the median housing value increased to \$142,797, and the median gross rent increased to \$717.

Demographic Information for the Morristown MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	3.8	23.1	57.7	15.4	0.0
Population by Geography	138,225	2.1	20.2	61.2	16.5	0.0
Housing Units by Geography	61,458	2.3	20.0	62.3	15.5	0.0
Owner-Occupied Units by Geography	37,824	0.8	17.1	63.5	18.6	0.0
Occupied Rental Units by Geography	15,277	5.6	27.3	57.1	10.0	0.0
Vacant Units by Geography	8,357	2.8	19.6	66.0	11.6	0.0
Businesses by Geography	7,878	6.3	22.5	55.8	15.4	0.0
Farms by Geography	344	1.5	11.9	66.6	20.1	0.0
Family Distribution by Income Level	37,421	23.8	18.8	20.3	37.1	0.0
Household Distribution by Income Level	53,101	25.7	16.2	17.8	40.2	0.0
Median Family Income - Morristown, TN MSA		\$48,094	Median Housing Value			\$121,229
			Median Gross Rent			\$636
			Families Below Poverty Level			15.5%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 12 financial institutions operated 31 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 11.5 percent deposit market share.



## Cleveland MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Regarding housing costs, the median housing value increased to \$158,546, and the median gross rent increased to \$780. Additionally, median family income increased to \$63,243.

Demographic Information for the Cleveland MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	12.5	16.7	50.0	20.8	0.0
Population by Geography	118,749	9.3	9.8	47.9	33.0	0.0
Housing Units by Geography	50,529	9.1	10.2	49.1	31.5	0.0
Owner-Occupied Units by Geography	30,377	3.9	8.1	49.6	38.4	0.0
Occupied Rental Units by Geography	14,834	19.2	12.1	47.6	21.1	0.0
Vacant Units by Geography	5,318	10.3	16.8	51.0	21.9	0.0
Businesses by Geography	8,709	7.0	13.0	50.2	29.8	0.0
Farms by Geography	320	0.9	6.6	50.6	41.9	0.0
Family Distribution by Income Level	31,204	22.4	17.3	18.7	41.5	0.0
Household Distribution by Income Level	45,211	24.6	16.0	16.8	42.5	0.0
Median Family Income - Cleveland, TN MSA		\$52,007	Median Housing Value			\$137,954
			Median Gross Rent			\$699
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 29 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 12.4 percent deposit market share.

## ALABAMA

### AL Non-MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Although, the total population slightly decreased to 506,356, the number of census tracts increased to 156. Regarding housing costs, the median housing value increased to \$115,316, and the median gross rent increased to \$646.

Demographic Information for the AL Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	0.0	14.1	60.0	25.9	0.0
Population by Geography	507,869	0.0	11.4	60.5	28.1	0.0
Housing Units by Geography	238,894	0.0	11.5	59.5	29.1	0.0
Owner-Occupied Units by Geography	137,140	0.0	10.0	60.3	29.7	0.0
Occupied Rental Units by Geography	57,702	0.0	14.6	60.2	25.1	0.0
Vacant Units by Geography	44,052	0.0	12.0	55.8	32.3	0.0
Businesses by Geography	26,444	0.0	11.2	57.9	30.9	0.0
Farms by Geography	1,314	0.0	8.8	61.4	29.8	0.0
Family Distribution by Income Level	132,802	22.9	17.8	18.7	40.6	0.0
Household Distribution by Income Level	194,842	25.6	15.7	16.5	42.1	0.0
Median Family Income Non-MSAs - AL		\$45,454	Median Housing Value			\$99,190
			Median Gross Rent			\$599
			Families Below Poverty Level			16.7%

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

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 54 financial institutions operated 152 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 8.6 percent deposit market share.

## Mobile MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Although, the total population slightly decreased to 430,197, the number of census tracts increased to 140. Regarding housing costs, the median housing value increased to \$138,005, and the median gross rent increased to \$848.

Demographic Information for the Mobile MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	120	15.8	22.5	35.0	25.0	1.7
Population by Geography	431,248	8.9	17.5	39.0	34.4	0.1
Housing Units by Geography	189,303	8.7	18.4	39.5	33.3	0.0
Owner-Occupied Units by Geography	107,755	5.4	14.3	41.5	38.9	0.0
Occupied Rental Units by Geography	52,566	12.9	24.4	34.6	28.1	0.0
Vacant Units by Geography	28,982	13.7	23.0	41.3	22.0	0.0
Businesses by Geography	29,982	6.9	19.8	32.9	40.3	0.2
Farms by Geography	647	3.7	9.1	46.7	40.5	0.0
Family Distribution by Income Level	108,049	23.8	15.6	19.1	41.5	0.0
Household Distribution by Income Level	160,321	26.3	14.9	16.0	42.8	0.0
Median Family Income - Mobile, AL MSA		\$54,139	Median Housing Value			\$124,066
			Median Gross Rent			\$776
			Families Below Poverty Level			15.7%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 25 financial institutions operated 110 full-service branches within the assessment area. Of these institutions, Truist ranked 9<sup>th</sup> with 2.5 percent deposit market share.

## Auburn MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 174,241, and the number of census tracts increased to 48. Regarding housing costs, the median housing value increased to \$169,421, and the median gross rent increased to \$861.

Demographic Information for the Auburn MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.7
Population by Geography	150,982	2.4	21.4	62.7	11.3	2.2
Housing Units by Geography	64,964	2.5	20.3	62.4	11.0	3.7
Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.5
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.5
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.5
Businesses by Geography	9,351	1.5	32.3	53.4	11.6	1.1
Farms by Geography	280	1.1	18.6	66.4	13.9	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.0
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.0
Median Family Income - Auburn-Opelika, AL MSA	\$61,141	Median Housing Value				\$156,485
					Median Gross Rent	\$788
					Families Below Poverty Level	14.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 19 financial institutions operated 44 full-service branches within the assessment area. Of these institutions, Truist ranked 8<sup>th</sup> with 6.8 percent deposit market share.

## Tuscaloosa MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 268,674, and the number of census tracts increased to 76. Regarding housing costs, the median housing value increased to \$165,284, and the median gross rent increased to \$794.

Demographic Information for the Tuscaloosa MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	4.9	31.1	39.3	21.3	3.3
Population by Geography	244,267	3.5	25.8	37.9	28.8	4.0
Housing Units by Geography	109,146	3.9	28.6	40.5	24.9	2.2
Owner-Occupied Units by Geography	56,387	3.1	21.2	40.3	35.0	0.4
Occupied Rental Units by Geography	29,513	3.5	36.9	41.5	15.6	2.6
Vacant Units by Geography	23,246	6.2	35.8	39.6	12.5	5.9
Businesses by Geography	14,666	2.3	30.0	36.2	29.3	2.4
Farms by Geography	528	2.3	32.8	32.4	32.4	0.2
Family Distribution by Income Level	56,657	24.8	15.9	17.9	41.4	0.0
Household Distribution by Income Level	85,900	27.1	14.8	15.8	42.2	0.0
Median Family Income - Tuscaloosa, AL MSA		\$55,049	Median Housing Value			\$151,764
			Median Gross Rent			\$731
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 26 financial institutions operated 61 full-service branches within the assessment area. Of these institutions, Truist ranked 16<sup>th</sup> with 1.4 percent deposit market share.

## Florence MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 150,791, and the number of census tracts increased to 41. Regarding housing costs, the median housing value increased to \$140,562, and the median gross rent increased to \$666.

Demographic Information for the Florence MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	8.3	19.4	58.3	13.9	0.0
Population by Geography	147,181	3.5	15.6	62.5	18.4	0.0
Housing Units by Geography	70,226	3.4	16.4	62.6	17.6	0.0
Owner-Occupied Units by Geography	42,590	1.5	11.7	66.6	20.2	0.0
Occupied Rental Units by Geography	18,226	6.5	26.1	53.2	14.2	0.0
Vacant Units by Geography	9,410	5.9	19.1	62.5	12.5	0.0
Businesses by Geography	8,883	9.5	15.2	55.2	20.0	0.0
Farms by Geography	296	4.4	8.8	66.9	19.9	0.0
Family Distribution by Income Level	40,191	21.4	17.4	20.8	40.4	0.0
Household Distribution by Income Level	60,816	25.1	15.9	17.0	42.0	0.0
Median Family Income - Florence-Muscle Shoals, AL MSA	\$54,339	Median Housing Value				\$113,275
		Median Gross Rent				\$606
		Families Below Poverty Level				13.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 48 full-service branches within the assessment area. Of these institutions, Truist ranked 6<sup>th</sup> with 5.3 percent deposit market share.

## Anniston MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Although the total population slightly decreased to 116,441, the number of census tracts increased to 38. Regarding housing costs, the median housing value increased to \$119,321, and the median gross rent increased to \$737.

Demographic Information for the Anniston MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	9.7	22.6	45.2	9.7	12.9
Population by Geography	116,648	5.1	17.5	63.8	10.3	3.2
Housing Units by Geography	53,296	6.7	19.2	61.2	10.3	2.7
Owner-Occupied Units by Geography	31,179	3.2	15.2	69.3	11.8	0.5
Occupied Rental Units by Geography	13,975	10.4	26.6	48.5	7.7	6.8
Vacant Units by Geography	8,142	13.9	22.0	51.7	8.5	3.9
Businesses by Geography	6,400	5.0	30.2	55.1	7.9	1.8
Farms by Geography	179	1.7	17.9	69.8	10.1	0.6
Family Distribution by Income Level	30,581	22.9	16.2	20.9	40.0	0.0
Household Distribution by Income Level	45,154	25.5	15.7	16.8	41.9	0.0
Median Family Income - Anniston-Oxford, AL MSA		\$52,300	Median Housing Value			\$104,880
			Median Gross Rent			\$620
			Families Below Poverty Level			16.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 10 financial institutions operated 31 full-service branches within the assessment area. Of these institutions, Truist ranked 7<sup>th</sup> with 7.8 percent deposit market share.

## Dothan MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 151,007, and the number of census tracts increased to 38. Regarding housing costs, the median housing value increased to \$127,953, and the median gross rent increased to \$744.

Demographic Information for the Dothan MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	5.9	20.6	58.8	14.7	0.0
Population by Geography	147,601	3.2	17.2	57.6	21.9	0.0
Housing Units by Geography	67,715	3.5	17.2	59.1	20.2	0.0
Owner-Occupied Units by Geography	38,800	1.3	14.1	62.2	22.5	0.0
Occupied Rental Units by Geography	18,045	7.1	23.1	50.0	19.8	0.0
Vacant Units by Geography	10,870	5.3	18.7	63.4	12.6	0.0
Businesses by Geography	9,974	7.3	17.6	46.8	28.2	0.0
Farms by Geography	587	1.0	15.0	62.9	21.1	0.0
Family Distribution by Income Level	38,150	22.5	17.0	18.8	41.7	0.0
Household Distribution by Income Level	56,845	25.5	14.9	17.4	42.1	0.0
Median Family Income - Dothan, AL MSA		\$51,581	Median Housing Value			\$111,522
			Median Gross Rent			\$652
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 19 financial institutions operated 53 full-service branches within the assessment area. Of these institutions, Truist did not rank as it does not operate a branch within the assessment area.



## Gadsden MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. Although the total population slightly decreased to 103,436, the number of census tracts increased to 33. Regarding housing costs, the median housing value increased to \$115,026, and the median gross rent increased to \$690.

Demographic Information for the Gadsden MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	10.0	33.3	40.0	16.7	0.0
Population by Geography	103,766	6.4	23.0	43.5	27.1	0.0
Housing Units by Geography	47,500	7.3	24.4	43.0	25.3	0.0
Owner-Occupied Units by Geography	28,472	4.0	19.7	43.5	32.9	0.0
Occupied Rental Units by Geography	11,427	13.4	30.0	43.2	13.5	0.0
Vacant Units by Geography	7,601	10.4	33.8	41.2	14.6	0.0
Businesses by Geography	5,921	5.2	21.1	47.1	26.7	0.0
Farms by Geography	180	1.1	15.0	49.4	34.4	0.0
Family Distribution by Income Level	27,595	24.6	16.1	19.2	40.1	0.0
Household Distribution by Income Level	39,899	24.9	17.0	14.8	43.4	0.0
Median Family Income - Gadsden, AL MSA		\$51,104	Median Housing Value			\$98,009
			Median Gross Rent			\$616
			Families Below Poverty Level			15.4%
<p><i>Source: 2015 ACS and 2021 D&amp;B Data.</i>  <i>Due to rounding, totals may not equal 100.0 percent.</i>  <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 13 financial institutions operated 23 full-service branches within the assessment area. Of these institutions, Truist ranked 10<sup>th</sup> with 2.1 percent.

## NEW JERSEY

### Atlantic City MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The number of census tracts increased to 74. Regarding housing costs, the median housing value decreased to \$228,961, and the median gross rent increased to \$1,100. The number of businesses increased to 28,743.

Demographic Information for the Atlantic City MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	70	12.9	22.9	30.0	31.4	2.9
Population by Geography	275,376	9.9	21.5	35.0	32.8	0.8
Housing Units by Geography	127,435	11.0	20.5	33.9	33.5	1.1
Owner-Occupied Units by Geography	68,194	3.4	16.3	39.3	40.1	1.0
Occupied Rental Units by Geography	33,624	25.3	31.3	25.7	16.7	1.0
Vacant Units by Geography	25,617	12.7	17.4	30.4	38.0	1.5
Businesses by Geography	25,693	9.7	18.8	33.3	37.3	0.9
Farms by Geography	738	1.9	12.5	41.3	43.2	1.1
Family Distribution by Income Level	68,395	22.8	17.0	18.5	41.7	0.0
Household Distribution by Income Level	101,818	24.8	15.8	17.4	42.0	0.0
Median Family Income - Atlantic City-Hammonton, NJ MSA	\$66,523	Median Housing Value				\$241,428
					Median Gross Rent	\$1,017
					Families Below Poverty Level	12.1%

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

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 12 financial institutions operated 48 full-service branches within the assessment area. Of these institutions, Truist ranked 10<sup>th</sup> with 1.5 percent deposit market share.

## Vineland MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population decreased to 154,152, but the number of census tracts increased to 42. Regarding housing costs, the median gross rent increased to \$1,054. The number of businesses increased to 12,146.

Demographic Information for the Vineland MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	5.7	17.1	42.9	22.9	11.4
Population by Geography	157,035	7.8	13.1	47.8	26.4	4.9
Housing Units by Geography	56,216	5.4	13.9	52.4	28.2	0.0
Owner-Occupied Units by Geography	33,402	2.2	7.7	55.5	34.7	0.0
Occupied Rental Units by Geography	16,966	11.2	23.7	47.7	17.5	0.0
Vacant Units by Geography	5,848	7.5	21.7	48.0	22.8	0.0
Businesses by Geography	10,806	7.6	16.0	50.1	26.2	0.1
Farms by Geography	440	3.2	5.0	51.4	40.5	0.0
Family Distribution by Income Level	35,059	21.2	17.6	19.5	41.8	0.0
Household Distribution by Income Level	50,368	24.8	15.6	18.0	41.6	0.0
Median Family Income - Vineland-Bridgeton, NJ MSA		\$57,550	Median Housing Value			\$155,671
			Median Gross Rent			\$971
			Families Below Poverty Level			14.1%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 10 financial institutions operated 26 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 40.6 percent deposit market share.

## Trenton MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the assessment area. The total population increased to 387,340, and the number of census tracts increased to 84. Regarding housing costs, the median housing value increased to \$324,206, and the median gross rent increased to \$1,347. The number of businesses increased to 45,634.

Demographic Information for the Trenton MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	23.4	19.5	24.7	31.2	1.3
Population by Geography	370,212	15.2	19.3	28.1	37.0	0.4
Housing Units by Geography	143,833	16.9	19.8	28.8	34.5	0.0
Owner-Occupied Units by Geography	84,045	7.3	16.9	32.3	43.5	0.0
Occupied Rental Units by Geography	46,501	28.5	23.4	24.9	23.2	0.0
Vacant Units by Geography	13,287	37.0	25.4	20.3	17.3	0.0
Businesses by Geography	40,870	10.4	17.2	29.3	43.1	0.0
Farms by Geography	918	9.0	20.2	29.8	41.0	0.0
Family Distribution by Income Level	88,299	23.9	16.6	18.5	41.1	0.0
Household Distribution by Income Level	130,546	26.1	14.5	16.5	42.9	0.0
Median Family Income - Trenton-Princeton, NJ MSA	\$94,908	Median Housing Value				\$301,759
		Median Gross Rent				\$1,154
		Families Below Poverty Level				8.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 23 financial institutions operated 118 full-service branches within the assessment area. Of these institutions, Truist ranked 18<sup>th</sup> with 0.3 percent deposit market share.

## WEST VIRGINIA

### Huntington MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, slight changes have occurred in the bank's assessment areas. Although, the total population decreased to 190,772, the number of census tracts increased to 57. Regarding housing costs, the median housing value increased to \$132,802, and the median gross rent increased to \$730.

Demographic Information for the Huntington MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	10.0	22.0	38.0	28.0	2.0
Population by Geography	194,919	6.0	14.9	47.1	30.6	1.4
Housing Units by Geography	89,320	7.8	15.7	46.7	29.2	0.7
Owner-Occupied Units by Geography	55,258	3.2	13.2	49.4	34.1	0.0
Occupied Rental Units by Geography	23,113	15.7	18.9	41.3	22.0	2.1
Vacant Units by Geography	10,949	14.0	21.5	44.2	19.6	0.7
Businesses by Geography	12,857	12.6	9.6	40.4	36.7	0.8
Farms by Geography	375	5.1	8.3	47.2	39.5	0.0
Family Distribution by Income Level	49,846	21.8	16.5	19.7	42.1	0.0
Household Distribution by Income Level	78,371	27.0	14.8	15.8	42.4	0.0
Median Family Income - Huntington-Ashland, WV-KY-OH MSA	\$54,584	Median Housing Value				\$114,519
		Median Gross Rent				\$646
		Families Below Poverty Level				12.8%

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

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 24 financial institutions operated 109 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 8.2 percent deposit market share.

## Beckley MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, slight changes have occurred in the bank's assessment areas. Although, the total population decreased to 115,079, the number of census tracts increased to 30. Regarding housing costs, the median housing value increased to \$108,891, and the median gross rent increased to \$651.

Demographic Information for the Beckley MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	0.0	10.3	79.3	10.3	0.0
Population by Geography	124,027	0.0	8.4	81.8	9.8	0.0
Housing Units by Geography	57,540	0.0	8.1	81.8	10.0	0.0
Owner-Occupied Units by Geography	36,348	0.0	7.9	81.3	10.7	0.0
Occupied Rental Units by Geography	12,595	0.0	8.9	79.5	11.6	0.0
Vacant Units by Geography	8,597	0.0	7.6	87.4	4.9	0.0
Businesses by Geography	7,291	0.0	4.3	84.7	11.0	0.0
Farms by Geography	204	0.0	3.4	88.2	8.3	0.0
Family Distribution by Income Level	32,877	20.6	18.2	20.7	40.5	0.0
Household Distribution by Income Level	48,943	24.1	16.3	18.0	41.6	0.0
Median Family Income - Beckley, WV MSA		\$47,856	Median Housing Value			\$96,054
			Median Gross Rent			\$606
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 12 financial institutions operated 40 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 9.0 percent deposit market share.

## Wheeling MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, slight changes have occurred in the bank's assessment areas. Although, the total population decreased to 73,016, the number of census tracts increased to 28. Regarding housing costs, the median housing value increased to \$121,034, and the median gross rent increased to \$660.

Demographic Information for the Wheeling MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	25.9	51.9	22.2	0.0
Population by Geography	76,117	0.0	11.6	64.3	24.1	0.0
Housing Units by Geography	36,952	0.0	14.6	63.0	22.5	0.0
Owner-Occupied Units by Geography	23,084	0.0	8.4	65.3	26.2	0.0
Occupied Rental Units by Geography	8,893	0.0	24.6	58.9	16.5	0.0
Vacant Units by Geography	4,975	0.0	25.2	59.1	15.7	0.0
Businesses by Geography	5,889	0.0	24.4	54.2	21.4	0.0
Farms by Geography	167	0.0	13.2	56.9	29.9	0.0
Family Distribution by Income Level	19,929	19.4	18.7	20.6	41.2	0.0
Household Distribution by Income Level	31,977	25.2	16.2	16.3	42.3	0.0
Median Family Income - Wheeling, WV-OH MSA		\$56,853	Median Housing Value			\$101,743
			Median Gross Rent			\$566
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 14 financial institutions operated 53 full-service branches within the assessment area. Of these institutions, Truist ranked 4<sup>th</sup> with 7.9 percent deposit market share.

## Parkersburg MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, slight changes have occurred in the bank's assessment areas. Although, the total population decreased to 89,490, and the number of census tracts increased to 30. Regarding housing costs, the median housing value increased to \$123,728, and the median gross rent increased to \$704.

Demographic Information for the Parkersburg MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	17.9	60.7	21.4	0.0
Population by Geography	92,400	0.0	9.5	70.8	19.7	0.0
Housing Units by Geography	43,508	0.0	10.3	71.0	18.7	0.0
Owner-Occupied Units by Geography	27,772	0.0	7.9	69.7	22.4	0.0
Occupied Rental Units by Geography	10,850	0.0	14.4	72.8	12.8	0.0
Vacant Units by Geography	4,886	0.0	14.6	74.9	10.5	0.0
Businesses by Geography	5,952	0.0	10.4	72.1	17.5	0.0
Farms by Geography	161	0.0	1.9	84.5	13.7	0.0
Family Distribution by Income Level	24,932	20.5	17.5	20.6	41.3	0.0
Household Distribution by Income Level	38,622	23.7	17.1	17.9	41.3	0.0
Median Family Income - Parkersburg-Vienna, WV MSA		\$51,552	Median Housing Value			\$105,543
			Median Gross Rent			\$621
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 10 financial institutions operated 28 full-service branches within the assessment area. Of these institutions, Truist ranked 3<sup>rd</sup> with 11.5 percent deposit market share.



## KENTUCKY

### Bowling Green MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 179,639, and the number of census tracts increased to 44. Regarding housing costs, the median housing value increased to \$160,631, and the median gross rent increased to \$778. The number of businesses increased to 16,131.

Demographic Information for the Bowling Green MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	5.1	25.6	38.5	25.6	5.1
Population by Geography	164,245	4.9	23.4	36.2	34.0	1.5
Housing Units by Geography	70,769	4.6	25.3	38.2	30.3	1.5
Owner-Occupied Units by Geography	39,399	1.9	18.6	42.3	37.0	0.3
Occupied Rental Units by Geography	23,597	9.7	32.5	32.0	22.0	3.7
Vacant Units by Geography	7,773	3.0	36.9	36.8	21.8	1.4
Businesses by Geography	14,290	5.2	20.3	35.1	35.8	3.7
Farms by Geography	744	1.2	15.1	42.6	39.8	1.3
Family Distribution by Income Level	41,939	21.5	17.4	20.0	41.1	0.0
Household Distribution by Income Level	62,996	25.3	14.2	17.9	42.6	0.0
Median Family Income - Bowling Green, KY MSA	\$55,109	Median Housing Value				\$127,271
					Median Gross Rent	\$675
					Families Below Poverty Level	13.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data.            Due to rounding, totals may not equal 100.0 percent.            (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 20 financial institutions operated 69 full-service branches within the assessment area. Of these institutions, Truist ranked 1<sup>st</sup> with 16.1 percent deposit market share.

## Owensboro MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The total population increased to 121,559, and the number of census tracts increased to 30. There are no longer any low-income census tracts within the assessment area. Regarding housing costs, the median housing value increased to \$138,071, and the median gross rent increased to \$775. The number of businesses increased to 9,461.

Demographic Information for the Owensboro MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.4	20.7	55.2	20.7	0.0
Population by Geography	116,342	3.2	20.4	54.8	21.6	0.0
Housing Units by Geography	50,178	3.4	21.4	56.2	18.9	0.0
Owner-Occupied Units by Geography	32,154	1.5	14.9	59.4	24.1	0.0
Occupied Rental Units by Geography	13,406	6.9	34.7	49.9	8.5	0.0
Vacant Units by Geography	4,618	6.2	28.2	52.7	12.8	0.0
Businesses by Geography	8,677	2.5	25.4	47.7	24.4	0.0
Farms by Geography	605	0.2	8.3	64.1	27.4	0.0
Family Distribution by Income Level	31,213	22.2	17.8	19.8	40.2	0.0
Household Distribution by Income Level	45,560	24.2	16.6	16.8	42.5	0.0
Median Family Income - Owensboro, KY MSA		\$58,106	Median Housing Value			\$111,096
			Median Gross Rent			\$632
			Families Below Poverty Level			12.3%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 15 financial institutions operated 41 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 12.1 percent deposit market share.

## Clarksville MSA Assessment Area

The following table presents demographic information from the 2015 ACS Census and 2021 D&B data. According to the 2020 U.S. Census, significant changes have occurred in the bank's assessment areas. The number of census tracts increased to 28. Regarding housing costs, the median housing value increased to \$118,924, and the median gross rent increased to \$864. The number of businesses increased to 6,245.

Demographic Information for the Clarksville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	8.3	20.8	41.7	12.5	16.7
Population by Geography	88,409	7.4	23.5	49.5	15.0	4.5
Housing Units by Geography	37,468	7.4	20.4	56.9	15.3	0.0
Owner-Occupied Units by Geography	17,124	4.8	8.4	64.8	22.0	0.0
Occupied Rental Units by Geography	14,411	10.8	37.2	42.8	9.2	0.0
Vacant Units by Geography	5,933	6.8	14.1	68.6	10.6	0.0
Businesses by Geography	5,580	11.4	19.4	50.1	17.1	2.0
Farms by Geography	443	4.3	3.4	59.4	32.7	0.2
Family Distribution by Income Level	22,221	24.6	20.1	20.9	34.5	0.0
Household Distribution by Income Level	31,535	27.6	18.9	19.4	34.1	0.0
Median Family Income - Clarksville, TN-KY MSA		\$53,979	Median Housing Value			\$102,001
			Median Gross Rent			\$759
			Families Below Poverty Level			14.8%

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

## Deposit Market Share Information

According to the FDIC Deposit Market Share data as of June 30, 2022, 8 financial institutions operated 22 full-service branches within the assessment area. Of these institutions, Truist ranked 2<sup>nd</sup> with 16.8 percent deposit market share.

## APPENDIX F: 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.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the state-wide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or non-profit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;

- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank’s assessment area(s) or a broader state-wide or regional area including the bank’s assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank’s retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

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

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000 but less than 50,000.

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

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

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

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

**Rated Area:** A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.