



PUBLIC DISCLOSURE

June 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Griffin (FNB)
Charter Number: 15572

318 South Hill Street
Griffin, Georgia 30224

Office of the Comptroller of the Currency

Three Ravinia Drive
Atlanta, Georgia 30346

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

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Overall CRA Rating

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

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

The major factors that support this rating include:

- FNB's level of lending, as reflected in the net loan-to-deposit (LTD) ratio, is considered reasonable.
- A majority of loans were originated inside the assessment area.
- FNB's distribution of home mortgages to borrowers of different income levels and commercial loans to businesses of different sizes is reasonable in relation to assessment area competition.
- The bank exhibits an excellent geographic distribution of home mortgages and small business loans among geographies of different income levels in relation to assessment area competition.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area, the bank's LTD ratio is considered reasonable.

We evaluated the bank's LTD ratio over 12 business quarters from the quarter ended March 31, 2019, through the quarter ended December 31, 2021. During the period, the bank's quarterly LTD ratio averaged 38.16 percent, with a quarterly low of 28.98 percent at the quarter ended December 31, 2021, and a quarterly high of 43.86 percent as of March 31, 2019. Over the period reviewed, the bank's LTD ratio steadily declined. In comparison, over the same 12 quarters, the quarterly average LTD ratios for two peer similarly sized financial institutions were 45.98 percent and 65.98 percent, respectively. For both peer financial institutions, the LTD ratios declined throughout the 12-quarter period.

In determining the LTD ratio to be reasonable, certain factors were considered. Primarily due to COVID-19 stimulus payments, the bank experienced an influx of deposit activity, resulting in a 30 percent increase in total deposits. While this factor resulted in a diminished LTD ratio, the bank has engaged in certain lending-related qualified investments. Specifically, the bank has made approximately \$2.0 million in deposits in minority-owned financial institutions. These investments augment the low quarterly average LTD ratio.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area.

The bank originated and purchased 73.6 percent of its total loans inside the bank's assessment area during the evaluation period. This analysis is performed at the bank, rather than the assessment area, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	264	71.7	104	28.3	368	36,053	58.9	25,199	41.1	61,252
Small Business	50	83.3	10	16.7	60	5,838,278	82.6	1,226,000	17.4	7,064,278
Total	314	73.4	114	26.6	428	5,874,331	82.4	1,251,199	17.6	7,125,530

Description of Institution

First National Bank of Griffin (FNB), is an intrastate community bank headquartered in the city of Griffin (Spalding County), Georgia. The bank has designated a single assessment area which includes the contiguous Georgia counties of Spalding, Pike, and Henry. During the period reviewed, the bank served its assessment area through its main office in the city of Griffin (Spalding County), five full-service branch offices, and one facility that offers drive-thru and electronic deposit-taking services. One branch (closed in early 2022, following the end of the review period) was located in the city of Zebulon, in Pike County. Three full-service offices and the one limited-service facility are located in Griffin. One branch is located in the city of Locust Grove, and another is located in the city of Hampton (both in Henry County). As of March 31, 2022, the bank reported total assets of \$395 million, total liabilities of \$374 million, and total equity capital of \$20 million. The loan portfolio, net of the allowance for loan and lease losses, totaled \$102 million and represented 26.0 percent of total assets.

Based on the number and dollar volume of lending, FNB's primary loan types include residential home lending and small business loans. Commercial lending products offered include equipment financing, real estate loans on commercial property, and working capital lines of credit. The bank also engages in Small Business Administration (SBA) lending and originated a high volume of SBA Paycheck Protection Program loans during the period reviewed. Personal lending product offerings include home equity and automobile loans. The bank offers both conventional and government-guaranteed and insured home mortgage loans, as well as fixed- and adjustable-rate mortgages for purchase or refinancing purposes.

As of March 31, 2022, FNB reported the total dollar amount of balance sheet real estate loans as \$90.8 million, representing 22.8 percent of total assets. Commercial loans on the balance sheet totaled \$7.8 million. Real estate loans make up the highest concentrations of credit in relation to Tier 1 Capital plus the allowance for loan and lease losses (capital), at 349.2 percent. The two largest real estate loan components are commercial real estate –non-farm non-residential loans at 151.6 percent, and 1-4 family residential loans at 110.1 percent. Commercial and industrial loans represent 30.0 percent of capital.

FNB received a rating of "Satisfactory" at the last CRA Evaluation dated April 1, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated FNB's CRA performance using Small Bank Performance criteria, which is lending focused. The evaluation review period included the timeframe from January 1, 2019, through December 31, 2021.

For this evaluation, we analyzed the bank's home mortgage and small business lending, including SBA Paycheck Protection Program loans, for the period of January 1, 2019, through December 31, 2021. We also considered lending-related qualified investments for that same period.

Selection of Areas for Full-Scope Review

The bank has only one assessment area. A full-scope review of the assessment area was performed for this evaluation.

Ratings

The bank has only one rating area: the State of Georgia. As there is also only one assessment area, the rating is based on a full-scope evaluation for the sole assessment area.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Georgia

CRA rating for the State of Georgia¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of home mortgage and small business lending activity is excellent.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The level of loan originations is reasonable considering the bank's size, financial condition, and credit needs of the assessment area. To augment low lending levels, the bank has made a significant volume of lending-related qualified investments. In addition, during 2020 and 2021, the bank originated a significant dollar volume of SBA Paycheck Protection Program (PPP) loans. Specifically, during 2020, the bank originated 234 PPP loans in the total amount of \$23.4 million. During 2021, the bank made 79 PPP loans, in the total amount of \$7.8 million. These PPP loans were included among the sample of 60 small business loans considered for this evaluation.

Description of Institution's Operations in Georgia

FNB has designated one assessment area, which includes the contiguous Georgia counties of Henry, Spalding, and Pike. All three counties are part of the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (Atlanta MSA).

This evaluation included input from a community group located in the AA. The private non-profit organization supports the local economy, specifically small businesses, through a variety of programs. The representative from the community group indicated the primary credit need is for small loans to businesses to help in improvements and small business lines of credit. In addition, the contact stated that credit-related workshops and educational programs would benefit the community.

The following table provides a summary of the demographic information for FNB's assessment area.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB of Griffin MSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	7.3	29.3	48.8	14.6	0.0
Population by Geography	293,197	4.6	27.7	51.3	16.3	0.0
Housing Units by Geography	111,028	5.4	28.8	50.8	15.1	0.0
Owner-Occupied Units by Geography	70,212	2.0	22.3	56.3	19.4	0.0
Occupied Rental Units by Geography	28,803	9.6	43.4	39.8	7.1	0.0
Vacant Units by Geography	12,013	14.8	31.8	44.8	8.7	0.0
Businesses by Geography	30,430	2.8	31.6	49.7	15.9	0.0
Farms by Geography	709	1.7	18.3	59.8	20.2	0.0
Family Distribution by Income Level	75,328	23.2	18.8	22.8	35.2	0.0
Household Distribution by Income Level	99,015	23.8	18.0	19.6	38.7	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs- Alpharetta, GA MSA		\$67,322	Median Housing Value			\$130,707
			Median Gross Rent			\$963
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The bank's main office is located in the city of Griffin (Spalding County). During the period reviewed, the bank served its assessment area through its main office in Griffin, five full-service branch offices, and one facility that offers only drive-thru and electronic deposit-taking services. According to 2020 Census Data, Spalding County, where the main office is located, has the highest percentage of persons in poverty of the three-county assessment area, at 17.5 percent. By comparison, the poverty percentages for Pike and Henry Counties are 9.2 percent and 9.1 percent, respectively, while the poverty percentage for the Atlanta MSA is 11.4 percent. Spalding also has the lowest median household income of the three-county assessment area (\$48,970). The median household income levels for the counties of Pike and Henry are higher, at \$68,138 and \$71,110, respectively. In addition, the median value of owner-occupied housing units in Spalding is lower than in Pike and Henry Counties, at \$134,800. In Pike and Henry Counties, the median value of owner-occupied housing units is significantly higher, at \$181,700 and \$189,600, respectively.

According to the U.S. Bureau of Labor Statistics, unemployment rates in the bank's three-county assessment area declined significantly throughout the period under review (January 1, 2019, through December 31, 2021). Of the three counties included in the assessment area, as of December 2021,

Spalding had the highest unemployment rate, at 3.2 percent. The unemployment rate in Spalding County steadily declined throughout the review period, from a high of 12.5 percent in April 2020. The second highest unemployment rate in the three-county assessment area was in Henry County, with a December 2021, unemployment rate of 3.0 percent. Pike County had the lowest unemployment as of December 2021, at 2.4 percent. The largest private sector employers in Spalding County include Caterpillar, a manufacturer of large equipment, and 1888 Mills, a towel manufacturer. The largest private sector employers in Pike County include TENCATE (a textiles firm), and Supreme Wabash (truck body fabrication). In Henry County, the largest private sector employers include distribution and warehousing operations for such major companies as Wayfair, Home Depot, and John Deere.

Henry, Spalding, and Pike Counties are all bedroom communities for the city of Atlanta, with residents who commute to work in the city center. Aside from major private sector companies, other large employers of residents in the three-county assessment area include county public education and hospital/medical care facilities.

There are 16 competitor banks operating in FNB's assessment area, with a combined 53 branch offices. Of these 16 banks, five have a larger asset size than FNB, and/or a larger share of deposits in the assessment area. The top competitors in the assessment area include large regional/national banks, namely Truist Bank, Wells Fargo, Ameris Bank, and Bank of America. Also, peer mortgage data for all banks subject to Home Mortgage Disclosure Act (HMDA) reporting requirements for 2020, shows that 477 lenders originated loans in the bank's three county assessment area. FNB ranked 46th among these lenders with respect to the number of HMDA-reportable loans for 2020. Given the bank's relatively small size, this volume of loans appears reasonable.

Scope of Evaluation in Georgia

The bank has one assessment area, which consists of the contiguous Georgia Counties of Pike, Spalding, and Henry. A full-scope review was conducted for the assessment area.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the assessment area is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans.

Home Mortgage Loans

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

Overall, the bank's lending reflects an excellent geographic distribution of home mortgage loans. The bank's percentage of home mortgage lending in both low- and moderate-income geographies exceeds the aggregate of all lenders originating home mortgage loans in the assessment area. Specifically, the bank originated 8.0 percent of home mortgages in low-income geographies, while the aggregate of all lenders originated .8 percent of home mortgage lending in low-income geographies. The bank originated 25.4 percent of its total home mortgages in moderate-income geographies. This percentage exceeded aggregate home mortgage lending levels in moderate-income geographies, which was 17.8 percent.

Small Loans to Businesses

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

Overall, the bank's lending reflects an excellent geographic distribution of loans to small businesses. The bank's percentage of small business lending in both low- and moderate-income geographies exceeds the aggregate of all lenders originating small business loans in the assessment area. Specifically, in low-income geographies, the bank originated 11.7 percent of its lending to small businesses, while the aggregate of all lenders originated 2.9 percent of lending to small businesses in low-income geographies. In moderate-income geographies, the bank originated 36.7 percent of lending to small businesses. This percentage exceeded aggregate small business lending levels in moderate-income geographies, which was 28.5 percent.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Overall, the bank's lending levels reflect a reasonable borrower distribution of home mortgage loans. The percentage of home mortgage loans to low-income borrowers exceeds the aggregate of all lenders originating home mortgage loans to low-income borrowers in the assessment area. Specifically, 12.5 percent of the bank's home mortgage lending was originated to low-income borrowers, while the aggregate of all lenders originated 7.8 percent of home mortgage loans to low-income borrowers. However, the bank originated 16.7 percent of home mortgages to moderate-income borrowers, which is lower than the aggregate lending to moderate-income borrowers (20.2 percent).

Small Loans to Businesses

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

Overall, the bank's lending levels reflect a reasonable borrower distribution of loans to small businesses. The percentage of small loans to businesses (businesses with annual gross revenues of \$1 million or less) exceeds the aggregate of all lenders originating small business loans in the assessment area. Specifically, 70.0 percent of the bank's business lending was to businesses with gross annual revenues

less than \$1 million, while the aggregate of all lenders originated 46.1 percent of business loans to businesses with revenues less than \$1 million. However, the percentage of lending to small businesses (70.0 percent) lags the demographic comparator of the percentage of small businesses in the assessment area (90.9 percent).

Responses to Complaints

The bank did not receive any CRA-related complaints during the period reviewed.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2019– 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
FNB Griffin Assessment Area	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	First National Bank of Griffin
Overall Bank:	Lending Test Rating
Georgia Assessment Area (State)	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-2021

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
FNB Griffin	264	36,053	100.0	18,737	2.0	8.0	0.8	22.3	25.4	17.8	56.3	65.5	58.3	19.4	1.1	23.2	0.0	0.0	0.0
Total	264	36,053	100.0	18,737	2.0	8.0	0.8	22.3	25.4	17.8	56.3	65.5	58.3	19.4	1.1	23.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-2021**

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
FNB Griffin	264	36,053	100.0	18,737	23.2	12.5	7.8	18.8	16.7	20.2	22.8	17.0	20.5	35.2	40.2	20.0	0.0	13.6	31.5
Total	264	36,053	100.0	18,737	23.2	12.5	7.8	18.8	16.7	20.2	22.8	17.0	20.5	35.2	40.2	20.0	0.0	13.6	31.5

*Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2019-2021		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FNB Griffin	60	7,371,278	100.0	3.0	11.7	2.9	31.8	36.7	28.5	49.6	51.6	52.1	15.5	0.0	16.5	0.00	0.0	0.00
Total	60	7,371,278	100.0	3.0	11.7	2.9	31.8	36.7	28.5	49.6	51.6	52.1	15.5	0.0	16.5	0.00	0.0	0.00

Source: 20XX D&B Data; Sampling of 60 small business loans from 01/01/2019 through 12/31/2021

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FNB Griffin	60	7,371,278	100.0	6,058	90.9	70.0	46.1	2.4	30.0	6.7	0.0	
Total	60	7,371,278	100.0	6,058	90.9	70.0	46.1	2.4	30.0	6.7	0.0	
<i>Source: 20XX D&B Data; Sampling of 60 small business loans from 01/01/2019 through 12/31/2021</i>												