## PUBLIC DISCLOSURE

November 27, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**United Community Bank** Certificate Number: 16889

306 East North Street Greenville, South Carolina 29601

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

> 10 10th Street NE, Suite 900 Atlanta, Georgia 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 **Satisfactory**.

An institution in this group has a satisfactory 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								
High Satisfactory	X	X	X					
Low Satisfactory								
Needs to Improve								
Substantial Noncompliance								

<sup>\*</sup> The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

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

- Lending levels reflect good responsiveness to assessment area credit needs.
- A high percentage of loans are made in the institution's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different size.
- The institution makes extensive use of innovative and flexible lending practices in order to serve assessment areas credit needs.
- The institution has made a relatively high level of community development loans.

## The Investment Test is rated High Satisfactory.

- The institution has a significant level of qualified community development investments.
- The institution exhibits excellent responsiveness to credit and community development needs.
- The institution occasionally uses innovative and complex investments to support community development initiatives.

## The Service Test is rated **High Satisfactory**.

- Delivery systems are accessible to essentially all portions of the assessment areas.
- To the extent changes have been made, the opening and closing of branches has not adversely impacted the accessibility of the bank's delivery systems, particularly in low-and moderate-income geographies and/or to low- and moderate-income individuals.
- Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The institution provides a relatively high level of community development services within its assessment areas.

## **DESCRIPTION OF INSTITUTION**

## **Background**

United Community Bank is a \$ 26.8 billion state chartered financial institution headquartered in Greenville, South Carolina (SC). United Community Bank operates Navitas Credit Corporation; United Community Payment Systems; NLFC Reinsurance Corporation; UCB Investments, Inc.; TFG Holdings, LLC; UCBI Georgia Credits, LLC; and United Community Development Corporation. United Community Bank Foundation was created in February 2020 and meets the definition of an affiliate. The bank is a wholly-owned subsidiary of United Community Bank, Inc., a one-bank holding company also headquartered in Greenville, SC. United Community Bank, Inc., also operates FinTrust Brokerage Services, LLC; FinTrust Insurance and Benefits, LLC; FinTrust Capital Advisors; and Seaside Capital Management, Inc. The institution received a Satisfactory rating at its previous FDIC Community Reinvestment Act (CRA) Performance Evaluation dated August 3, 2020, based on Large Institution Examination Procedures.

Since the August 3, 2020, FDIC CRA evaluation through September 30, 2023, United Community Bank completed five acquisitions totaling approximately \$8.5 billion: Seaside Bank, Orlando, Florida, for \$1.8 billion in July 2020; Aquesta Bank, Cornelius, North Carolina, for \$752 million in October 2021; Reliant Bank, Brentwood, Tennessee, for \$3.0 billion in January 2022; Progress Bank, Huntsville, Alabama, for \$1.9 billion in January 2023, and The First National Bank of South Miami, South Miami, Florida for \$1.0 billion in July 2023.

## **Operations**

As of the evaluation date, United Community Bank operated 197 full-service branches in six states including Alabama, Florida, Georgia, North Carolina, South Carolina, and Tennessee. Since the previous evaluation, the bank opened or acquired 76 full-service branches, including 24 each in Florida and Tennessee, 12 in Alabama, 9 in North Carolina, 4 in South Carolina, and 3 in Georgia. The bank also closed or sold 21 full-service branches, including five each in Tennessee and South Carolina, four each in North Carolina and Georgia, two in Alabama, and one in Florida. The bank currently has nine loan production offices (LPOs), including three in Georgia, two each in South Carolina and North Carolina, and one each in Alabama and Tennessee. Since the previous evaluation, the bank has opened seven LPOs including three in North Carolina, two in Alabama, and one each in Georgia, and Tennessee. The bank has also closed eight loan LPOs including two each in North Carolina, Georgia and South Carolina, as well as one each in Alabama and Tennessee.

United Community Bank's primary business focus is residential and commercial lending. The bank originates a wide variety of commercial loans including owner-occupied commercial real estate, commercial investment property, as well as commercial and industrial loans. The bank also offers small business loans, including Small Business Administration (SBA) loans primarily through their branch network. In addition, the bank originates residential mortgage loans for sale in the secondary market as well as for retention in its loan portfolio. The bank provides a variety of deposit products including checking, savings, money market, certificates of deposit, and individual

retirement accounts. United Community Bank also offers a full range of investment, trust, and cash management products and services to both commercial and individual customers.

## **Ability and Capacity**

As of September 30, 2023, the Consolidated Reports of Condition and Income (Call Report) indicates United Community Bank had total assets of \$26.8 billion, total deposits of \$23.3 billion, and total loans of \$18.2 billion. Due to the acquisitions previously mentioned, the bank has grown significantly since the previous evaluation. As shown in the following table, commercial real estate loans (loans secured by nonfarm nonresidential properties) and commercial and industrial loans comprise 57.3 percent of total loans and one-to-four family residential loans comprise 25.3 percent of total loans.

Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	2,248,272	12.3
Secured by Farmland	58,814	0.3
Secured by 1-4 Family Residential Properties	4,611,178	25.3
Secured by Multifamily (5 or more) Residential Properties	279,293	1.5
Secured by Nonfarm Nonresidential Properties	6,524,658	35.8
Total Real Estate Loans	13,722,215	75.2
Commercial and Industrial Loans	3,916,340	21.5
Agricultural Production and Other Loans to Farmers	9,603	0.1
Consumer Loans	477,242	2.6
Obligations of State and Political Subdivisions in the U.S.	36,245	0.2
Other Loans	12,461	0.1
Lease Financing Receivable (net of unearned income)	65,811	0.4
Total Loans	18,239,917	100.0

There are no financial or legal impediments, other than legal lending limits, that would limit the bank's ability to meet the credit needs of the assessment areas. However, the COVID-19 Pandemic affected lending during the evaluation period.

## **DESCRIPTION OF ASSESSMENT AREAS**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. United Community Bank has designated 42 assessment areas in six states (rated areas). Since the previous evaluation, the bank expanded into Florida in July 2020 (Jacksonville MSA, Miami MSA, Naples MSA, Sarasota MSA, Orlando MSA, Port St. Lucie MSA, and Tampa MSA). In addition, the bank added assessment areas: two in North Carolina in October 2021 (Charlotte MSA and Wilmington MSA); four in Tennessee in January 2022 (Non MSA, Chattanooga MSA, Clarkesville MSA, and the Nashville MSA); and two in Florida in January 2023 (Fort Walton Beach MSA and Panama City MSA). The bank also expanded into Alabama in

January 2023 (Birmingham MSA, Daphne-Fairhope-Foley MSA, Decatur MSA, Florence MSA, Huntsville MSA, and Tuscaloosa MSA).

There have also been changes to assessments areas due to branch openings or closings. United Community Bank entered the Columbia MSA assessment area in South Carolina with the opening of two branches in December 2020. The bank exited the Fayetteville MSA assessment area in North Carolina with a branch closing in April 2022. The bank exited the Tennessee Non MSA assessment area when the bank closed a branch in Monroe County, Tennessee. However, the bank acquired two branches in the Tennessee Non MSA assessment area in January 2022, which were sold in August 2023 resulting in the bank again exiting the assessment area. United Community Bank also entered two Florida markets with branch openings: the Titusville MSA assessment area in January 2022 and the Gainesville MSA assessment area in April 2023. The Orlando MSA assessment area expanded to include Lake County with a branch opening in February 2022.

Assessment area delineations are based on the 2015 American Community Survey (ACS) Census data. In 2022, the Federal Financial Interagency Examination Council (FFIEC) released updates to the MSA and Metropolitan Divisions, states, counties, census tracts, and income level indicators based on information collected during the 2020 United States (U.S.) Census. Because of the 2020 U.S. Census, the number of census tracts increased and income classifications changed, which impacted the bank's assessment areas. The following table details the counties; number of census tracts based on 2015 ACS data and 2020 census data; branches, and details of changes in each assessment area for the current evaluation. Refer to the individual rated area sections of this evaluation for specific economic and demographic information by rated areas.

Assessment Area	Counties in Assessment Area	# of CTs 2015 ACS	# of CTs 2020 Census	# of Branches	Changes Since Last Examination
Alabama					
Birmingham MSA	Jefferson County*	-	189	3	Jefferson, Baldwin,
Daphne MSA	Baldwin County*	-	44	1	Morgan, Lauderdale,
Decatur MSA	Morgan County*	-	31	1	Madison, and
Florence MSA	Lauderdale County*	-	26	1	Tuscaloosa Counties
Huntsville MSA	Madison County*	-	95	3	added by acquisition of
Tuscaloosa MSA	Tuscaloosa County*	-	59	1	Progress Bank 1-1-2023
Florida			•		
Fort Walton Beach MSA	Okaloos and Walton Counties*	-	70	3	Okaloos and Walton Counties added by acquisition of Progress Bank 1-1-2023
Gainesville FL MSA	Alachua County*	-	58	1	Alachua County added- Bank opened Gainesville Branch on 4-3-2023
Jacksonville MSA	Duval and Saint Johns Counties	215	270	1	Duval and Saint Johns Counties added by acquisition of Seaside Bank 7-1-2020

Miami MD	Broward, Miami-Dade, and Palm Beach Counties	1,219	1,497	7	Broward, Miami-Dade, and Palm Beach Counties added by acquisition of Seaside
Naples MSA	Collier County	74	109	1	Bank 7-1-2020 Collier County added by acquisition of Seaside Bank 7-1-2020
Orlando MSA	Lake <sup>1</sup> , Orange, and Seminole Counties	349	431	5	Orange and Seminole Counties added by acquisition of Seaside Bank 7-1-2020  Lake County added- Bank opened Tavares Branch on 2-22-2021
Panama City MSA	Bay County*	-	50	1	Bay County added by acquisition of Progress Bank 1-1-2023
Port St. Lucie MSA	Martin County	45	43	1	Martin County added by acquisition of Seaside Bank 7-1-2020
Sarasota MSA	Manatee and Sarasota Counties	174	217	1	Manatee and Sarasota Counties added by acquisition of Seaside Bank 7-1-2020
Tampa MSA	Hillsborough and Pinellas Counties	567	610	1	Hillsborough and Pinellas Counties added by acquisition of Seaside Bank 7-1-2020
Titusville MSA	Brevard County <sup>2</sup>	-	148	1	Brevard County added- Bank opened Melbourne Branch on 1-3-2022
Georgia					
Athens MSA	Clarke, Madison, and Oconee Counties	42	52	2	
Atlanta MSA	Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, Dekalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Paulding, Pickens, Rockdale, and Walton Counties	909	1,440	33	Barrow County added 1-1-20
Brunswick MSA	Glynn County	16	26	3	
Gainesville GA MSA	Hall County	36	50	4	
Georgia Non MSA	Banks, Chattooga, Fannin, Gilmer, Habersham, Jackson,		101	17	
Rome MSA	Floyd County	20	26	3	
Savannah MSA	Chatham County	72	88	3	
North Carolina					•

Asheville MSA	Buncombe, Haywood, and Henderson Counties	99	116	3	
Charlotte MSA	Iredell and Mecklenburg Counties <sup>2</sup>	277	351	7	Iredell and Mecklenburg Counties added by acquisition of Aquesta Bank 10-1-2021
Fayetteville MSA	Harnett County <sup>3</sup>	27	28	0	OMB expanded the Fayetteville MSA in March 2020 to include Harnett County  Harnett County was removed when Dunn Branch closed 4-1-2022
North Carolina Non MSA	Avery, Cherokee, Clay, Columbus, Duplin, Graham, Jackson, Macon, Mitchell, Swain, Transylvania, Watauga, and Yancey Counties	93	118	17	
Raleigh MSA	Johnston and Wake Counties	212	283	9	
Wilmington MSA	New Hanover County <sup>2</sup>	45	55	1	New Hanover County added by acquisition of Aquesta Bank 10-1- 2021
South Carolina					
Charleston MSA	Charleston, Dorchester, and Berkeley Countries	156	178	5	v
Columbia MSA	Lexington and Richland Counties <sup>1</sup>	163	190	2	Lexington and Richland Counties added- Bank opened Branches on 12- 14-2020
Greenville MSA	Anderson, Greenville, Laurens, and Pickens Counties	195	231	14	
Hilton Head MSA	Beaufort County	41	43	1	
Myrtle Beach MSA	Horry County	72	78	6	
South Carolina Non MSA	Cherokee and Greenwood Counties	48	34	3	Abbeville and Oconee were removed 1-1-20
Spartanburg MSA	Spartanburg County	69	87	4	
Tennessee					
Chattanooga MSA	Hamilton County <sup>2</sup>	-	87	1	Hamilton County added by acquisition of Reliant Bank 1-1-2022
Clarksville MSA	Montgomery County <sup>2</sup>	-	46	4	Montgomery County added by acquisition of Reliant Bank 1-1-2022
Cleveland MSA	Bradley and Polk Counties	24	31	1	
Knoxville MSA	Blount, Knox, Loudon, and Roane Counties	161	182	6	
Nashville MSA	Cheatham, Davidson, Maury, Robertson, Rutherford, Sumner, and Williamson Counties <sup>2</sup>	-	372	15	Cheatham, Davidson, Maury, Robertson, Rutherford, Sumner, and Williamson Counties added by acquisition of

					Reliant Bank 1-1-2022
Tennessee Non MSA	McMinn <sup>4</sup> , Monroe <sup>4</sup> , and Hickman <sup>2</sup> Counties	17	7	0	McMinn and Monroe Counties were removed- Bank closed Madisonville Branch 12-4-2020  OMB expanded the Tennessee Non MSA in March 2020 to include Hickman County  Hickman County removed- Bank closed FNB Centerville and Lyles Branches 8-4-2023

Source: Bank records. Assessment areas are as of 12/31/2022. Branch data as of 09/30/2023. Census tracts as of 2020 American Community Survey Census.

#### SCOPE OF EVALUATION

#### **General Information**

This evaluation covers the period from July 1, 2020, to September 30, 2023. Examiners used the Interagency Large Institution Examination Procedures to evaluate United Community Bank's CRA performance. These procedures include three tests: Lending, Investment, and Service. The Lending Test is given the most weight in the evaluation and an institution may not receive an overall "Satisfactory" rating unless its Lending Test receives at least a "Low Satisfactory" rating. Refer to the Appendices for Large Bank Performance Criteria for additional details.

Examiners evaluated the bank's lending data, deposit activity, and number of branches to determine relative weighting of the rated areas in reaching overall conclusions. When compared to other states, a higher percentage of lending, deposit activity, and branching network is in Georgia. Consequently, examiners gave primary weight in assigning the overall rating and conclusions to performance in Georgia. Secondary weight was assigned to North Carolina, South Carolina, Tennessee, and Florida in a descending order of impact. Given the Progress Bank merger was consummated on January 23, 2023, Alabama, as well as the Fort Walton Beach MSA and the Panama City MSA assessment areas, were not included in the Lending Test. The following table details the bank's loans, deposits, assessment areas, and branches by rated area.

<sup>\*</sup>These markets were not included in the Lending Test analysis in this MSA.

<sup>&</sup>lt;sup>1</sup>These markets are included in the 2021 and 2022 Lending Test analysis in this MSA;

<sup>&</sup>lt;sup>2</sup>These markets are included in the 2022 Lending Test analysis in this MSA;

<sup>&</sup>lt;sup>3</sup>These markets are included in the 2020 and 2021 Lending Test analysis in this MSA;

<sup>&</sup>lt;sup>4</sup>These markets are included in the 2020 Lending Test analysis in this MSA

	Loans	S	Depos	its	Branches		
Assessment Area	\$(000s)	%	\$(000s)	%	#	%	
Georgia	5,077,239	48.2	10,982,155	51.2	65	35.7	
North Carolina	2,068,597	19.7	3,454,366	16.1	37	20.3	
South Carolina	1,987,451	18.9	3,466,600	16.1	35	19.2	
Tennessee	664,452	6.3	2,401,593	11.2	27	14.9	
Florida	731,143	6.9	1,155,746	5.4	18	9.9	
Total	10,528,882	100.0	21,460,460	100.0	182	100.0	

Refer to the rated area sections of each state for details concerning assessment areas reviewed using full- and limited-scope procedures.

#### **Activities Reviewed**

This evaluation includes a review of loans reported in 2020, 2021, and 2022 pursuant to the Home Mortgage Disclosure Act (HMDA) and CRA reporting requirements. While examiners reviewed and analyzed reported HMDA and CRA data (small business loans) for the aforementioned years, the evaluation will only present and discuss 2021 small business lending and 2022 HMDA lending, which are the most recent years that aggregate data is available for the loan types. However, examiners discussed significant performance variances and/or trends, where appropriate, under the *Geographic Distribution* and *Borrower Profile* performance factors. In addition, the lending analyses consider the number and dollar volume of loans. Lastly, the *Geographic Distribution* and *Borrower Profile* discussion focuses only on loans United Community Bank originated and purchased within the assessment areas. Refer to the tables in the Appendices for comparison purposes.

Examiners evaluated home mortgage, small business, and small farm lending over the past three full calendar years of reported loans to determine if all products had sufficient activity for review and to determine the weight placed on each product. As shown in the following table, United Community Bank's reportable loans by number and dollar volume reflect an emphasis on home mortgage loans. As a result, examiners gave more weight to home mortgage lending. However, in some rated areas, the bank's lending distributions were more heavily weighted on small business lending. Additional details of weighting are discussed in the Scope for each rated area. Additionally, due to the nominal number and dollar volume of small farm loans, these loans will not be analyzed. For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and small business loans. While the number and dollar volume of loans are presented, examiners emphasize performance by the number of loans under the Geographic Distribution and Borrower Profile performance factors, because the number of loans is a better indicator of the number of individuals and businesses served. Examiners compared bank performance to demographics from the 2020 US Census data, 2015 ACS data, and aggregate HMDA data for home mortgage lending, business demographics from Dun and Bradstreet (D&B) data, and CRA aggregate data for small business lending. The table below reflects the loan products reviewed, by number and dollar volume, over the entire evaluation period.

Loan Products Reviewed								
I and Calabase	Un	iverse	Reviewed					
Loan Category	y # \$(000s)		#	\$(000s)				
Home Mortgage	32,413	8,363,672	32,413	8,363,672				
Small Business	29,378	3,986,311	29,378	3,986,311				
Total	61,791	12,349,983	61,791	12,349,983				

This evaluation includes all community development loans, qualified investments, and community development services identified by bank management. Community development loans and services from July 1, 2020 through September 30, 2023, were considered, unless otherwise noted. Qualified investments included new investments, as well as donations, and qualified investments from the prior evaluation that were still outstanding as of the current evaluation date.

## CONCLUSIONS ON PERFORMANCE CRITERIA

#### **LENDING TEST**

The Lending Test rating is High Satisfactory. Lending levels reflect good responsiveness to the assessment areas' credit needs. Overall, a high percentage of loans are made in the institution's assessment areas. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank made a relatively high level of community development loans. The bank's performance was consistent in Georgia, North Carolina, and South Carolina with the overall performance conclusion. Performance in Florida and Tennessee was below the overall performance conclusion.

## **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. The bank's performance was consistent in each rated area, with the exception of Florida where the performance was below the overall performance conclusion. Refer to each respective rated area analysis for additional details.

In 2020, 2021, and 2022, United Community Bank originated and purchased 32,413 home mortgage loans totaling approximately \$8.4 billion and 29,378 small business loans totaling approximately \$4.0 billion. Of this total, 27,779 home mortgage loans totaling approximately \$7.1 billion and 26,140 small business loans totaling approximately \$3.4 billion were originated inside the assessment areas.

Based on the September 30, 2023 Consolidated Reports of Condition and Income, United Community Bank's net loan-to-deposit ratio was 77.5 percent. The bank's average net loan-to-deposit ratio was 71.7 percent of the 13 quarter year-ends since the previous evaluation. During the evaluation period, the net loan-to-deposit ratio ranged from a high of 79.1 percent, as of September 30, 2020, to a low of 63.1 percent, as of December 31, 2021.

#### **Assessment Area Concentration**

Overall, a high percentage of loans is made in the institution's assessment areas. As shown in the following table, the bank originated a majority of its home mortgage and small business loans, by number and dollar volume, in the assessment areas.

		Lending	g Inside a	nd Outs	side of the	Assessment	Area			
	N	umber	of Loans			Dollar Aı	nount	of Loans \$(	000s)	
Loan Category	Inside		Outs	Outside		Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2020	10,016	88.6	1,287	11.4	11,303	2,286,562	86.3	364,096	13.7	2,650,658
2021	9,608	87.6	1,361	12.4	10,969	2,652,066	86.1	427,686	13.9	3,079,753
2022	8,155	80.4	1,986	19.6	10,141	2,166,347	82.3	466,915	17.7	2,633,262
Subtotal	27,779	85.7	4,634	14.3	32,413	7,104,975	85.0	1,258,697	15.0	8,363,672
Small Business										
2020	13,916	88.8	1,755	11.2	15,671	1,591,802	85.5	269,051	14.5	1,860,853
2021	8,466	89.2	1,025	10.8	9,491	1,107,656	86.5	173,584	13.5	1,281,240
2022	3,758	89.1	458	10.9	4,216	724,447	85.8	119,771	14.2	844,218
Subtotal	26,140	89.0	3,238	11.0	29,378	3,423,905	85.9	562,406	14.1	3,986,311
Total	53,919	87.3	7,872	12.7	61,791	10,528,880	85.3	1,821,103	14.7	12,349,983
Source: HMDA Reported I	Data; CRA R	eported D	ata		•	•		•		

## **Geographic Distribution**

Overall, the geographic distribution of loans reflects adequate penetration throughout the combined assessment areas. Consistent performance in the rated areas supports this conclusion. The rated sections include detailed analysis and comparisons to aggregate and demographic data.

#### **Borrower Profile**

Overall, the distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes. The bank's performance is consistent in each rated area, with the exception of Florida where the performance is below the overall performance conclusion. The rated sections include detailed analysis and comparisons to aggregate performance and demographic data.

## **Innovative or Flexible Lending Practices**

United Community Bank makes extensive use of innovative and flexible lending practices in order to serve assessment areas credit needs. During the review period, United Community Bank originated 15,337 innovative and flexible loans, totaling approximately \$2.0 billion, to individuals and businesses. This performance represents an increase of approximately 41.7 percent and 43.7 percent, by number and dollar volume, respectively, from the previous evaluation.

United Community Bank offers an array of home loan programs that benefit low- and moderate-income individuals across all assessment areas, as described below.

- *Affordable Loan Program* assists homeowners who are unemployed or underemployed, as well as those who have experienced financial hardships, including those associated with military service, death of a spouse, or a medical hardship that has occurred.
- Federal Housing Administration (FHA) Home Loan Program provides low down payments, low closing costs, and flexible credit qualification standards.
- Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) Set-Aside Program – provides funds for down payment, closing cost, and counseling assistance and rehabilitation of eligible households.
- *Home One* provides low down payments for first-time homebuyers.
- *Home Possible* provides low down payments for low- and moderate-income borrowers or borrowers in high-cost or underserved communities.
- *Home Ready* provides home loan options to low- and moderate-income borrowers with flexible financing options for homes in low-income areas.
- **Possibilities Achieved Through Homeownership (PATH) Program** provides home loan options for low- and moderate-income borrowers, who live in minority census tracts, or who make less than 80.0 percent of the MSA median income for their area. The program includes 100.0 percent financing and no private mortgage insurance (PMI) requirements.
- *Veterans Administration (VA) Home Loan Program* provides low down payment options, higher debt-to-income ratios, and flexible sources of funding for closing costs.
- United States Department of Agriculture (USDA) Home Loan Program provides 100.0 percent financing and other financing flexibility.

In addition to the flexible and innovative lending programs available across all assessment areas, United Community Bank provides home loan opportunities to low- and moderate-income borrowers through partnerships with the following state-specific programs.

- Georgia Department of Community Affairs (DCA) Dream Loan Programs provides home loans and down payment assistance to first-time homebuyers, borrowers who have not owned a home in the past three years, or who purchase homes in targeted areas.
- *North Carolina Home Advantage Mortgage* provides competitive interest rates and down payment assistance for first time or military veteran home buyers. Borrowers may also receive a tax credit with the home purchase.
- **South Carolina Homebuyer Program** provides low, fixed-rate interest and down payment assistance for first time homebuyers.
- Tennessee Housing Department Authority (THDA) Great Choice Home Loan Program -

provides home loan options and down payment assistance to first-time, repeat, and military veterans that are low- or moderate-income. The program is in conjunction with FHA, VA, USDA, and uninsured conventional loans. The program includes a homebuyer education course.

- *Florida Housing* provides long-term, fixed-rate financing with down payment and closing costs assistance for first-time homebuyers.
- *Alabama Housing Finance Authority* program dedicated to serving and financing the housing needs of low- and moderate-income homeowners. The program also creates affordable housing opportunities of single- and multifamily homes.

In addition to the aforementioned home loan programs, United Community Bank implemented a new home loan program in June 2023 called the Non Traditional Credit 97 Core 7/6. This product is available across all assessment areas and applies to borrowers that do not have a credit score and allows a loan-to-value ratio of up to 97.0 percent. There have been no originations under this program as of the current evaluation date. Further, United Community Bank implemented another home loan program in November 2023 called the United Home Access. This product is available across all assessment areas and offers down payment assistance through the National Homebuyers Fund, providing 100.0 percent financing. There have been no originations under this program as of the current evaluation date.

As it relates to business products, United Community Bank underwrites loans originated under Small Business Administration (SBA) programs. SBA programs require extra effort by bank personnel compared to conventional loans. SBA programs support small businesses by providing lower interest rates and flexible lending terms. The bank offers SBA 7a loans, SBA 504 loans, and SBA Express Loans. SBA Paycheck Protection Program (PPP) loans were also offered and provided funds to businesses impacted by the COVID-19 pandemic. United Community Bank also offers other innovative and flexible lending products to meet its assessment areas' credit needs

The bank offers a Business Express product that provides small dollar business loans with no financial data required upfront. The bank implements an online, automated self-service loan program called United Minute Lender Loans where consumers and small businesses with a checking account can apply for a loan and receive a response in minutes. The bank partners and provides financing with Neighborhood Lending Partners (NLPs), a Community Development Financial Institution (CDFI), that provides flexible, innovative, and solution-oriented financing and services that renew and rebuild inclusive and sustainable neighborhoods, including providing affordable housing.

The following table details the bank's innovative and flexible lending programs, with originations from July 1, 2020 through September 30, 2023.

	Innovative or Flexible Lending Programs									
Type of	2	020		2021	2	022	2023		Totals	
Program	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Loan Program	15	851	42	3,422	32	1,881	16	1,806	105	7,960
AL Housing Finance Authority	-	-	-	-	-	-	1	240	1	240
Business Express Product	421	14,688	1,058	40,845	1,417	67,164	1,194	70,268	4,090	192,965
Community Development Financial Institution	2	138	6	1,280	12	1,973	1	239	21	3,630
FHA Home Loan Program	277	60,061	333	73,595	222	53,373	209	56,730	1,041	243,759
FHLB AHP Set- Aside Program	33	5,582	36	7,047	8	1,322	9	1,743	86	15,694
Florida Housing	-	-	-	-	1	242	7	2,012	8	2,254
Georgia DCA Dream Loan Program	1	132	-	-	1	125	-	-	2	257
Home One	16	3,383	17	3,650	4	855	6	1,865	43	9,753
Home Possible	31	5,425	31	5,546	20	4,414	15	3,237	97	18,622
Home Ready	13	2,918	30	6,752	1	259	6	1,525	50	11,454
NC Home Advantage Mortgage	3	656	2	418	3	802	15	3,245	23	5,121
PATH Program	18	4,149	48	10,515	132	34,956	248	77,552	446	127,172
PPP Loans	128	3,427	7,328	714,546	-	-	-	-	7,456	717,973
SC Housing Homebuyer Program	-	-	4	404	12	1,568	2	266	18	2,238
SBA Lending (504, 7a, Express)	92	61,877	199	147,329	161	133,412	141	128,054	593	470,672
THDA Great Choice Home Loan Program	1	128	4	745	1	145	3	485	9	1,503
United Minute Lender Loans	74	659	195	1,556	154	1,262	138	1,163	561	4,640
USDA Home Loan Program	84	16,412	96	18,282	59	11,305	25	5,390	264	51,389
VA Home Loan Program	107	30,991	154	45,010	89	31,024	73	29,424	423	136,449
Totals	1,316	211,477	9,583	1,080,942	2,329	346,082	2,109	385,244	15,337	2,023,745
Source: Bank Data										

Further, United Community Bank responded to the need for credit relief caused by the COVID-19 pandemic. Congress signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) into law on March 27, 2020. With the CARES Act, creditors were encouraged to offer loan forbearance or payment modifications to customers impacted by the COVID-19 pandemic. In response, United Community Bank offered various types of payment deferral options of 30, 60, or 90 days to impacted borrowers. Specifically, United Community Bank provided payment deferrals to 394 consumers and 310 businesses. The following summarizes offerings provided by the bank:

- Deferred principal and continuing to pay interest monthly;
- Deferred principal and deferred interest to maturity;
- Deferred interest and recoup deferred interest in first post-deferral payment; and
- Deferred interest to maturity.

United Community Bank continues to extend a high volume of small dollar loans, which are very responsive to their assessment areas' credit needs. The bank's small dollar loans provide customers with an alternative from high-priced lending products from payday lenders and other financial entities that may charge high interest rates and loan fees. The bank originated 2,467 small dollar loans totaling approximately \$3.7 million during the evaluation period.

Performance in this criterion is generally consistent throughout all assessment areas. Therefore, the Lending Test conclusions for each assessment area omit further discussion of innovative and flexible lending practices.

## **Community Development Loans**

United Community Bank made a relatively high level of community development loans. During the evaluation period, the bank originated 120 community development loans totaling approximately \$434.7 million. This level of activity represents 2.0 percent of average total assets and 3.1 percent of average loans. Since the previous evaluation, the number and dollar volume of community development loans increased by 149.0 percent and 207.2 percent, respectively. Included in the total are two community development loans totaling approximately \$3.9 million that were made outside of the assessment areas. Since the two loans benefit the broader state areas of the bank's operations, the loans were included in the overall community development loans. The bank's performance was consistent in Georgia, North Carolina, South Carolina, and Florida with the overall performance conclusion. Performance in Tennessee was below the overall performance conclusion.

United Community Bank's community development lending provides a source of capital that impacts community and economic needs. Since the previous evaluation, the bank has identified and responded to community needs by financing affordable housing, community programs and healthcare, and meeting business economic development needs and revitalization and stabilization efforts within its assessment areas.

The following tables present the bank's community development lending by community development purpose, rated area, and year. The assessment areas of each rated area includes a detailed discussion of community development lending activities.

			Com	munity D	evelo	pment Lendii	ng by R	ated Area			
Rated Area		Affordable Housing		nmunity ervices		Economic evelopment	Revi	talize or Stabilize	Totals		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
Georgia	-	-	2	9,514	14	32,825	19	90,360	35	132,699	
North Carolina	3	8,020	2	7,500	3	8,702	14	96,287	22	120,509	
South Carolina	6	7,232	3	15,209	3	5,002	12	47,704	24	75,147	
Tennessee	1	3,200	-	-	-		1	11,500	2	14,700	
Florida	12	4,820	3	18,517	12	37,282	8	27,100	35	87,719	
Bank- wide	-	-	-	-	2	3,929	-	-	2	3,929	
Total	22	23,272	10	50,740	34	87,740	54	272,951	120	434,703	
Source: Bank	Record	's	-		1						

Activity Year	1	Affordable Housing		ommunity Services		conomic velopment		evitalize or Stabilize	Totals		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
2020	3	4,639	-	-	-	=	1	500	4	5,139	
2021	2	1,754	1	2,500	16	22,647	36	117,306	55	144,207	
2022	15	16,140	6	30,740	8	15,949	13	142,867	42	205,696	
2023	2	739	3	17,500	10	49,144	4	12,278	19	79,661	
Total	22	23,272	10	50,740	34	87,740	54	272,951	120	434,703	

The two bank-wide community development loans that benefit the bank's broader state areas are SBA 504 loans that maintained a business' operations and created additional jobs, thereby promoting economic development.

#### **INVESTMENT TEST**

The Investment Test is rated High Satisfactory. United Community Bank has a significant level of qualified investments. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. The bank's performance was consistent in Georgia, North Carolina, South Carolina, and Tennessee with the overall performance conclusion. Performance in Florida was below the overall performance conclusion.

## **Investment and Grant Activity**

The institution has a significant level of qualified community development investments and donations. Investments and donations during this evaluation period totaled \$329.9 million, or 1.5 percent of average total assets and 6.1 percent of average total securities, since the previous evaluation. This level of investment represents a significant increase from the previous evaluation, when United Community Bank maintained \$186.3 million in community development investments; and current investment percentage levels are in line with the 1.5 percent of total assets and 7.1 percent of total securities noted during the previous evaluation. Bank-wide investments include 32 investments totaling \$168.6 million that benefit multiple rated areas. Additionally, two investments totaling \$12.4 million were originated outside of the assessment areas but in a broader state-wide area that includes the assessment areas. Because the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide investments.

Of the total qualified investments and donations, approximately 99.6 percent were made in qualified investments and 0.4 percent were made in donations. Qualified community development investments primarily include mortgage-backed securities (MBS), municipal bonds, and funds providing low-income housing tax credits (LIHTCs) designed to provide sources for affordable housing. CRA qualified investments and grants with a primary purpose of affordable housing totaled \$289.1 million, or 87.6 percent, of total CRA qualified investments. The following tables show the bank's investments by community development purpose, rated area, and year. The assessment areas of each rated area includes a detailed discussion of qualified investment activities.

Rated	Affor	dable Housing		Community Services		Economic evelopment		evitalize or Stabilize	Totals		
Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
Georgia	33	44,456	261	550	28	2,057	4	2,502	326	49,565	
North Carolina	12	26,071	69	92	14	12	4	54	99	26,229	
South Carolina	27	26,199	80	137	10	6,011	2	11	119	32,358	
Tennessee	9	17,571	49	114	2	4,002	-	-	60	21,687	
Florida	14	18,542	32	597	1	3	-	-	47	19,142	
Bank-wide	26	156,277	4	11,503	3	8,486	1	4,700	34	180,966	
Total	121	289,116	495	12,993	58	20,571	11	7,267	685	329,947	

		Qua	lified I	nvestments	by Ac	tivity Year				
Activity Year		ordable ousing		nmunity ervices	_	onomic elopment		italize or abilize	Т	otals
v	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	38	141,911	-	-	4	10,486	3	7,254	45	159,651
2020	-	-	2	10,000	-	-	-	-	2	10,000
2021	11	110,200	-	-	-	-	-	-	11	110,200
2022	4	28,304	1	1,500	1	4,000	-	-	6	33,804
2023	3	8,500	1	500	3	6,000	-	-	7	15,000
Subtotal	56	288,915	4	12,000	8	20,486	3	7,254	71	328,655
Qualified Grants & Donations	65	201	491	993	50	85	8	13	614	1,292
Total	121	289,116	495	12,993	58	20,571	11	7,267	685	329,947
Source: Bank Data			•	•	•				•	•

Below are examples of bank-wide qualified investments benefiting the assessment areas.

- In 2022, the bank invested \$10.0 million in a fund providing LIHTCs that benefited properties in Tennessee and Florida. This investment promotes affordable housing.
- In 2021, the bank invested \$7.7 million in a MBS comprised of loans for two multi-family properties located across Georgia and North Carolina where the majority of the units are designated for low- and moderate-income individuals. This investment promotes affordable housing.
- The bank continues to hold \$5.0 million in a prior period Small Business Investment Company (SBIC) that invests in small businesses throughout the assessment areas. This investment promotes economic development.

## Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and community development needs throughout the rated areas and assessment areas it serves. Qualified investments made during the evaluation period primarily responded to the assessment areas' affordable housing needs. MBSs and LIHTCs comprise the majority of the bank's qualified investments. Specifically, prior period and current qualified investments included 46 MBSs for \$219.2 million and 10 LIHTCs for \$69.8 million. Of the MBSs, 95.5 percent by dollar volume are for the construction, purchasing, or renovating of multi-family affordable housing. In addition, the bank invested an aggregate of \$1.0 million in a minority depository institution and \$19.5 million in small business development funds to foster economic development. Further, the bank established the United Community Bank Foundation, initially funding in fourth quarter 2020, to meet the community development needs of the assessment areas served. During the current evaluation, United Community Bank invested an aggregate of \$11.5 million to support the foundation and meet community needs. Lastly, the substantial majority of donations, by number and dollar amount, were directed to community services in the assessment areas.

Performance in this criterion is generally consistent throughout all assessment areas. Therefore, the Investment Test conclusions for each assessment area omit further discussion of responsiveness to credit and community economic development needs.

#### **Community Development Initiatives**

The institution occasionally uses innovative and complex investments to support community development initiatives. MBSs make up the substantial majority of the bank's new qualified investments since the prior evaluation. MBSs were structured specifically to benefit the assessment areas, adding some complexity, thereby, sustaining and providing affordable housing. Prior period investments consisted of long-term investments that are still active, with a majority supporting affordable housing initiatives. In addition, the bank provided innovation through the establishment of the United Community Bank Foundation, which allows the bank to target community development needs of the assessment areas served.

Performance in the criterion is generally consistent throughout all assessment areas. Therefore, the Investment Test conclusions for each assessment area omit further discussion of community development initiatives.

#### **SERVICE TEST**

The Service Test rating for United Community Bank is High Satisfactory. Delivery systems are accessible to essentially all portions of the assessment areas. To the extent of the changes made, the opening and closing of branches has not adversely impacted the accessibility of the bank's delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies or individuals. In addition, United Community Bank provides a relatively high level of community development services within its assessment areas. Overall performance is generally consistent with the rated areas performance.

#### **Accessibility of Delivery Systems**

United Community Bank's delivery systems are accessible to essentially all portions of the institution's assessment areas. Since the previous evaluation, the number of branches increased from 143 to 197, or 37.8 percent. As a result of the 2020 Census, the income classification of the 29 branches changed in Florida, Georgia, North Carolina, and South Carolina. The net effect of the census changes resulted in an increase of four branches in low-income census tracts and a decrease of two branches in moderate-income census tracts. With these changes, the percentage of branches in low-income census tracts was relatively in line with the percentage of census tracts and population. The percentage of branches in moderate-income census tracts was slightly below the percentage of census tracts and population. Refer to rated areas' conclusion sections for additional details regarding branch distribution.

United Community Bank operates 194 automated teller machine (ATM) locations throughout the assessment areas, with 14 ATMs not co-located with a brick and mortar location. Out of the 194 ATMs, 45 are Interactive Teller Machines (ITMs) that provide the ability to interact with a live,

virtual teller. The ITMs provide many traditional banking services such as depositing cash and checks, cashing checks, making loan payments, and transferring funds. All of the bank's ATMs are bilingual (English and Spanish). Of the total 194 ATMs/ITMs, the percentage of ATMs/ITMs located in low-income census tracts is comparable to the percentage of census tracts and population. The percentage of the ATMs and ITMs located in moderate-income census tracts is slightly below the percentage of census tracts and population. In addition, 13 ATMs and ITMs are located in distressed or underserved middle-income census tracts. United Community Bank also has eight loan production offices (LPOs), mortgage production offices, and deposit production offices (DPOs) in Alabama, Georgia, North Carolina, South Carolina, and Tennessee. The following table details the bank's census tracts, population, branches, and ATMs by geographic income level.

		Branch I	Distribution by	Geograph	y Income Le	vel		
Tract Income	Census	Tracts	Popula	tion	Bran	ches	A	<b>Ms</b>
Level	#	%	#	%	#	%	#	%
Low	488	6.1	1,689,404	5.1	12	6.1	12	6.2
Moderate	1,893	23.5	7,684,910	23.1	39	19.8	42	21.7
Middle	2,873	35.7	12,406,117	37.3	79	40.1	80	41.2
Upper	2,539	31.6	10,985,305	33.0	61	31.0	54	27.8
NA	248	3.1	483,509	1.5	6	3.0	6	3.1
Total	8,041	100.0	33,249,245	100.0	197	100.0	194	100.0
Source: 2020 U.S. Cens	us & Bank Dat	а		'		•		•

In addition to the branch and ATM network, United Community Bank offers alternative delivery systems to expand access to retail banking services to all individuals. This includes operation of its website, <a href="www.ucbi.com">www.ucbi.com</a>, which contains information about products, services, and other information about the bank. The bank also offers telephone, online, and mobile banking, which gives consumers and business customers access to their accounts 24 hours a day to perform various transactions. These systems provide the ability to check account balances, view or hear transactions, transfer funds, pay bills, make deposits, as well as locate branches, ITMs, and ATMs. In addition, drive-up windows are located at most branch offices. There is no additional cost for these banking services.

Overall, these alternative delivery systems enhance the accessibility of the bank's financial services. Performance in this criterion is generally consistent throughout each rated state and related assessment areas. Therefore, the Service Test conclusions for each rated area or full-scope review assessment area omit further discussion of this performance.

#### **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing branches has generally not adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank acquired or opened 76 branches. Of these branch openings, Tennessee accounted for 31.6 percent, Florida accounted for 31.6 percent, Alabama accounted for 15.8 percent, North Carolina accounted for 11.8 percent, South Carolina accounted for 5.3 percent and Georgia accounted for 3.9 percent. Of the new branches, 3 are in low-, 6 are in moderate-, 25 are in middle-, and 42 are in upper-income census tracts.

In addition, during the evaluation period, the institution closed 21 branches. Of these branch closings, South Carolina accounted for 23.8 percent, Tennessee accounted for 23.8 percent, Georgia accounted for 19.1 percent, North Carolina accounted for 19.0 percent, Alabama accounted for 9.5 percent, and Florida accounted for 4.8 percent of the branch closings. Of the closed branches, one was in moderate-, 12 were in middle-, and 8 were in upper-income census tracts. The net change in branches resulted in the percent of branches located in low-income census tracts being slightly above the percent of low-income population in those census tracts. However, the percent of branches in moderate-income census tracts remained below the percent of moderate-income population in those census tracts. Changes in branch locations are discussed further within the rated area and assessment area sections where changes have occurred.

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

Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. United Community Bank offers a wide range of products and services designed to meet the banking needs of its assessment areas. Consumer and commercial loan and deposit products include various affordable home mortgage programs, government loan sponsored programs for home mortgage borrowers and small businesses, low-cost deposit products, including a free checking account for consumers, and affordable deposit products for small businesses and nonprofit organizations. In May 2022, United Community Bank implemented BankOn, a new checking account product. This offers a bank account for unbanked and underbanked individuals that find it difficult to establish a checking account at a financial institution. The account offers low fees, no overdraft charges, online bill pay, and other basic attributes. Each branch offers the same products and services. Additionally, branch drive-thru hours either mirror lobby hours or are extended to meet each assessment area's needs. Performance in this criterion is generally consistent throughout each rated area and related assessment areas. Therefore, the Service Test conclusions for each rated area and full-scope reviewed assessment areas omit further discussion of business hours and services.

## **Community Development Services**

United Community Bank provides a relatively high level of community development services within its assessment areas. Employees used their financial and banking expertise to provide 575 qualified community development services for 2,362 hours to 219 community development organizations. This level represents a significant increase in the number of services from the previous CRA evaluation and is particularly noteworthy considering that the pandemic resulted in limitations to in-person service activities. These services include bank personnel delivering financial services or technical assistance to various organizations that benefit each of the bank's assessment areas. The type and level of assistance provided varied with each employee and organization, but generally is ongoing for multiple years, as some hold positions on the Board or committees of the organizations.

Of the 575 community development services, community services accounted for 80.2 percent, affordable housing accounted for 9.6 percent, economic development accounted for 9.2 percent, and revitalization/stabilization accounted for 1.0 percent of the total community development services provided during the evaluation period. Given the time period covered by this evaluation, the total services equate to approximately 1.5 community development services and 6.3 community development service hours per branch per year.

Community development services that benefited the bank-wide area totaled nine activities for 76 hours and are included as the bank met the community development service needs of its assessment areas. These activities included bank personnel serving in leadership capacities for community development organizations, which provide services to children and families in need, such as food and financial education.

The tables below detail community development service activities by purpose and state. Refer to the discussions of Community Development Services within each assessment area analysis for additional details and examples.

	Bank-Wide Co	mmunity	Develo	pment S	Service	s by Year	•			
Activity Year	Affor Hou			Community Services		Economic Development		italize abilize	Totals	
·	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
2020	10	27	58	134	5	34	2	4	75	199
2021	6	51	57	369	17	269	2	12	82	701
2022	18	148	159	431	21	205	1	4	199	788
2023	21	106	187	501	10	60	1	7	219	674
Total	55	332	461	1,435	53	568	6	27	575	2,362
Source: July 1, 2020 through Sept	ember 30, 2023 Bani	k Records						•		•

Bank-Wid	le Com	munity	Develo	pment S	Service	s by State	e			
State	_	rdable using		nunity vices	Economic Development		Revitalize or Stabilize		Totals	
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Georgia	17	82	154	489	24	197	3	7	198	775
South Carolina	21	86	147	374	4	50	-	-	172	510
North Carolina	4	35	46	170	17	281	3	20	70	506
Tennessee	1	6	47	102	6	14	-	-	54	122
Florida	12	123	58	224	2	26	-	-	72	373
Sub-Total	55	332	452	1,359	53	568	6	27	566	2.286
Bank-wide	-	-	9	76	-	-	-	-	9	76
Total	55	332	461	1,435	53	568	6	27	575	2,362
Source: July 1, 2020 through September 30, 202	3 Bank R	ecords?				•				

United Community Bank's community development service activities demonstrate good responsiveness, innovation, and complexity. These efforts are exemplified by their collaborative social impact 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.

- United Community Bank allocated resources to the Together for Good Council. This council was created in 2021 to help advance United Community Bank's social impact programs. The council is comprised of bank employees throughout the bank's assessment areas where the employees use their skills, knowledge, and experience to support the four dimensions of the bank's social impact program. The council has selected several days throughout the year to designate donations towards a specific cause. The council, along with the rest of the bank's employees, are encouraged to serve throughout the community in honor of these select days.
- United Community Bank maintains partnerships with local Habitat for Humanity organizations focusing on housing strategies throughout the bank's assessment areas.
   United Community Loan Operations provides loan servicing for homebuyers of Habitat for Humanity of Montgomery County, TN. Habitat's mission is to eliminate poverty housing in the Clarksville-Montgomery County areas and to make decent, affordable shelter for all people.
- United Community Bank created Junior Board to introduce high school students (seniors and juniors) to the local business community. As ambassadors of United Community Bank, the Junior Board learns about leadership, community service, and the financial industry through association with the bank. The bank currently has eight Junior Board locations throughout its assessment areas. Students that serve on the Junior Board attend high schools where a majority of the student population qualify for free or reduced lunch programs.
- In April 2023, United Community Bank partnered with Greenlight Financial Technology, Inc. to provide its customers free access to the Greenlight Family Finance App. This collaboration is part of United Community Bank's commitment to use the skills as bankers to improve the financial health of the bank's customers and communities.

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## **GEORGIA**

**CRA RATING FOR GEORGIA: SATISFACTORY** 

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

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

United Community Bank has designated seven assessment areas within the State of Georgia. The bank operates 65, or 35.7 percent, of its total branch offices in Georgia. Georgia accounts for 48.2 percent of bank-wide loans and 51.2 percent of the bank-wide deposits. Overall, United Community Bank ranks 6th in the state, with a deposit market share of 4.1 percent. Competitor institutions in the Georgia assessment areas include Truist Bank, Bank of America, N.A., Wells Fargo Bank, N.A., Synovus Bank, and JPMorgan Chase Bank, N.A.

## SCOPE OF EVALUATION – GEORGIA

The evaluation of the Georgia performance considered the operations of United Community Bank in seven assessment areas, which are detailed in the *Description of Assessment Areas*. Based on the number of loans and branches, as well as the dollar volume of deposits, examiners conducted full-scope reviews of the bank's performance in the Atlanta and the Georgia Non MSA assessment areas. Limited scope areas included the Athens MSA; Brunswick MSA; Gainesville MSA; Rome MSA; and Savannah MSA assessment areas. During the review period, home mortgage loans were given more weight than small business loans when considering the number and dollar volume of these products in five assessment areas. Small business lending was given more weight than home mortgage lending when considering the number of dollar volume of these products for the Athens MSA and Savannah MSA assessment areas. Refer to the following table for the distribution of lending, deposits, and branches in each assessment area.

Aggaggment Area	Loans	S	Depos	its	Bra	nches
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Athens MSA	125,736	2.5	209,322	1.9	2	3.1
Atlanta MSA	2,796,038	55.1	5,115,362	46.6	33	50.8
Brunswick MSA	161,941	3.2	299,417	2.7	3	4.6
Gainesville MSA	304,939	6.0	756,014	6.9	4	6.1
Georgia Non MSA	1,215,530	23.9	3,857,891	35.1	17	26.2
Rome MSA	163,291	3.2	401,668	3.7	3	4.6
Savannah MSA	309,764	6.1	342,481	3.1	3	4.6
Georgia Total	5,077,239	100.0	10,982,155	100.0	65	100%

## CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

#### LENDING TEST

The Lending Test rating is High Satisfactory. Lending levels in Georgia reflect good responsiveness to the assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects good penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans. Consistent performance in the Athens MSA, Atlanta, MSA, Brunswick MSA, and Gainesville MSA assessment areas primarily contributed to this rating. The Georgia Non MSA assessment area performance is above the overall performance conclusion, while the Rome MSA, and Savannah MSA assessment areas are below the overall performance conclusion.

#### **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. Refer to each Georgia assessment area for details.

#### **Geographic Distribution**

Overall, the geographic distribution of loans reflects adequate penetration throughout the Georgia assessment areas. Performance in four assessment areas is consistent with the rated area performance. Performance in the Georgia Non MSA, Athens MSA, and Brunswick assessment areas is above the rated area performance.

## **Borrower Profile**

Overall, the distribution of borrowers reflects good penetration among retail customers of different income levels and businesses of different sizes in Georgia. Performance in three assessment areas is consistent with the rated area performance. Performance in the Georgia Non MSA assessment areas is above the rated area performance, while performance in the Atlanta MSA, Rome MSA, and Savannah MSA assessment areas is below the rated area performance.

## **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in Georgia. During this evaluation period, the bank originated 35 community development loans totaling \$132.7 million. This performance represents 29.2 percent, by number, and 30.5 percent, by dollar volume, of total bank-wide community development loans. Community development lending has significantly increased since the previous evaluation, when 19 community development loans totaling \$60.7 million were made. Additionally, five loans totaling \$37.7 million were originated outside of the assessment areas but in a broader statewide area that includes the assessment areas. Because the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide lending. The bank's performance in the Atlanta, MSA assessment area is consistent with this conclusion. Performance in the Gainesville MSA assessment area is above the performance conclusion, while the performance for the remaining four assessment areas was below the performance conclusion. The following table illustrates the community development loans by assessment area and purpose.

	Commu	nity Develop	ment l	Lending by	Rated	l Area – Ge	eorgia	ì			
Assessment Area		ordable ousing		nmunity ervices	· ·	onomic elopment		vitalize or tabilize	Totals		
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
Athens MSA	-	-	-	-	-	-	-	-	-	-	
Atlanta MSA	-	-	-	-	9	16,436	11	24,062	20	40,498	
Brunswick MSA	-	-	-	-	-	-	-	-	-	-	
Gainesville MSA	-	-	1	3,514	2	8,835	3	31,616	6	43,965	
Georgia Non MSA	-	-	1	6,000	-	-	1	1,984	2	7,984	
Rome MSA	-	-	-	-	-	-	1	1,185	1	1,185	
Savannah MSA	-	-	-	-	-	-	1	1,383	1	1,383	
State-wide Activities	-	-	-	-	3	7,554	2	30,130	5	37,684	
Total	-	-	2	9,514	14	32,825	19	90,360	35	132,699	
Source: Bank Records											

The analysis for each full-scope Georgia assessment area includes a detailed discussion of community development loans. Below are examples of the bank's state-wide activities in Georgia.

- A loan totaling \$5.6 million to construct a new production facility located in a moderate-income census tract. This loan will revitalize and stabilize the area by creating approximately 200 new jobs consisting primarily of a low- and moderate-income workforce.
- A loan totaling \$25.0 million to construct a new manufacturing plant as part of a new industrial park located in a moderate-income census tract. This loan will revitalize and stabilize the area by attracting new businesses, residents, and will create new jobs.
- A PPP loan totaling \$2.0 million to a business operating in a moderate-income census tract. The loan provided assistance in maintaining business operations, thereby promoting revitalization and stabilization.

#### INVESTMENT TEST

The Investment Test performance is High Satisfactory. The bank has a significant level of qualified investments in Georgia. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. Performance was generally consistent among the assessment areas.

#### **Investment and Grant Activity**

United Community Bank has a significant level of qualified investments in Georgia. The bank made or maintained 326 investments totaling \$49.6 million throughout the state, representing 15.0 percent of total bank-wide qualified community development investments by dollar volume. This represents a decrease in both number and dollar volume since the previous evaluation, when 414 qualified investments totaling \$57.9 million were made in the state. Included in state-wide activities is one qualified investment totaling \$2.7 million that benefited the broader state-wide area in Georgia that includes the assessment areas. Additionally, one prior period investment totaling \$49,777 benefited outside of the assessment areas but in a broader state-wide area. Because the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide investment. Further, 16 bank-wide qualified investments targeted Georgia, as noted in the bank-wide Investment Test analysis. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment areas. A majority of donations targeted community services. The following table details the bank's qualified investments, grants, and donations by community development purpose.

		Qualified I	nvestn	nents by R	ated A	rea - Georg	gia			
Assessment Area		ordable ousing		Community Services		onomic elopment		italize or abilize	Т	otals
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Athens MSA	2	7,050	5	4	-	-	-	-	7	7,054
Atlanta MSA	12	34,599	86	121	14	2,029	1	2,500	113	39,249
Brunswick MSA	3	11	4	4	-	-	-	-	7	15
Gainesville MSA	1	5	23	33	4	7	-	-	28	45
Georgia Non MSA	8	7	108	357	4	4	1	1	121	369
Rome MSA	2	2	33	25	6	17	2	1	43	45
Savannah MSA	3	10	2	6	-	-	-	-	5	16
State-wide Activities	2	2,772	-	-	-	-	-	-	2	2,772
Total	33	44,456	261	550	28	2,057	4	2,502	326	49,565

The investments that impacted multiple assessment areas within the state or that benefited the broader state-wide area in Georgia include two prior period MBSs totaling \$2.7 million. The MBSs are secured by loans to low- and moderate-income borrowers and multi-family properties where the majority of units are designated for low- and moderate-income individuals. The two investments promote affordable housing. The investment totaling \$2.7 million benefited the Atlanta MSA, Gainesville MSA, and Savannah MSA assessment areas.

#### **SERVICE TEST**

The Service Test rating for this institution is High Satisfactory in Georgia. United Community Bank's delivery systems are readily accessible to all portions of the institution's Georgia 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 and/or to low and moderate-income individuals. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, and the bank provides a relatively high level of community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to essentially all portions of the institution's assessment areas. United Community Bank operates 65 branches in Georgia, which represents 33.0 percent of bank-wide branches. As a result of the 2020 Census, the income-classification of 16 branches changed in Georgia. The net effect of the income classification changes resulted in a decrease of branches in low-income census tracts by one and an increase of five in moderate-income census tracts.

The branch distribution in low-income census tracts is slightly below the percent of the population, but, the branch distribution in moderate-income census tracts is well above the percent of the population in the respective tracts. The bank has one branch in a distressed or underserved middle-income census tract. The distribution of ATMs is consistent with the branch distribution, with two additional remote ATMs located in moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level in Georgia.

Tract Income Level	Census	Tracts	Population		Branches		Open B	ranches	Closed Branches		
	#	%	#	%	#	%	#	%	#	%	
Low	130	7.3	441,469	6.2	3	4.6	-	-	-	-	
Moderate	412	23.1	1,667,071	23.4	24	36.9	-	-	-	-	
Middle	581	32.6	2,470,980	34.7	20	30.8	-	-	2	50.0	
Upper	598	33.5	2,387,273	33.6	14	21.5	3	100.0	2	50.0	
NA	62	3.5	151,724	2.1	4	6.2	-	-	-	-	
Totals	1,783	100.0	7,118,517	100.0	65	100.0	3	100.0	4	100.0	

## **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing branches has not adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened three branches and closed four branches in Georgia. There were no branches opened or closed in low- or moderate-income census tracts. As such, this area will not be further discussed in the Georgia assessment areas.

#### **Community Development Services**

United Community Bank provides a relatively high level of community development services in Georgia. Bank employees and directors provided 198 qualifying services totaling 775 hours throughout the Georgia assessment areas. This performance represented 34.4 percent, by number, of the bank-wide community development services. In addition, this performance reflects an increase since the previous evaluation when the bank performed 153 community development services in Georgia which reflects the bank's responsiveness to community needs. Community development services equate to 0.9 services and 3.7 hours per branch per year.

Community development services that benefited the larger state-wide area totaled one activity for six hours and are included, as the bank met the community development service needs of its assessment areas. This activity included bank personnel serving on the Board of an affordable housing organization.

The following table details the bank's community development services activity by assessment area and purpose during the evaluation period.

Community Dev	elopm	ent Serv	vices in	Georgia	a by As	sessment	Area			
Assessment Area		rdable using		nunity vices		nomic opment	Revitalize or Stabilize		Totals	
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Athens MSA	2	19	-	-	-	-	-	-	2	19
Atlanta MSA	4	12	65	199	7	79	-	-	76	290
Brunswick MSA	-	-	5	7	1	4	-	-	6	11
Georgia Non MSA	5	22	74	205	8	69	3	7	90	303
Gainesville MSA	-	-	-	-	2	17	-	-	2	17
Rome MSA	-	-	3	18	4	16	-	-	7	34
Savannah MSA	5	23	7	60	2	12	-	-	14	95
Total in Assessment Areas	16	76	154	489	24	197	3	7	197	769
State-wide Activities	1	6	-	-	-	-	-	-	1	6
Totals	17	82	154	489	24	197	3	7	198	775
Source: July 1, 2020 through September 30, 2023	Bank Re	cords								

## 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 20 contiguous counties from the Atlanta-Sandy Springs-Roswell, GA MSA in their entirety: Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Paulding, Pickens, Rockdale, and Walton. United Community Bank operates 33, or 50.8 percent, of its Georgia branches in this assessment area. By dollar volume, the assessment area accounts for 55.1 percent of the rated area loans and 46.6 percent of the rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area changed as a result of the 2020 U.S. Census. The following table reflects the changes in census tract income level and the number of census tracts based on the 2015 ACS and 2020 U.S. Census.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	98	111
Moderate	229	338
Middle	275	452
Upper	299	488
Income Not Assigned	8	51
Total	909	1,440
Source: 2015 ACS Data and 2020 U.S. Census Data		

## **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census and 2022 D&B data.

Demographic Information of the Assessment Area									
Assessment Area: Atlanta MSA									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	1,440	7.7	23.5	31.4	33.9	3.5			
Population by Geography	5,863,057	6.3	24.2	33.2	34.1	2.2			
Housing Units by Geography	2,237,046	7.1	24.2	32.0	34.1	2.5			
Owner-Occupied Units by Geography	1,323,673	3.0	19.0	35.6	41.2	1.2			
Occupied Rental Units by Geography	745,066	13.2	32.7	26.7	22.9	4.5			
Vacant Units by Geography	168,307	12.6	27.9	27.0	28.3	4.0			
Businesses by Geography	1,216,581	5.8	22.7	29.6	38.9	2.9			
Farms by Geography	19,091	4.0	22.8	38.5	33.2	1.5			
Family Distribution by Income Level	1,385,773	21.5	17.0	19.6	41.9	0.0			
Household Distribution by Income Level	2,068,739	23.3	16.2	18.0	42.6	0.0			
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$84,791	Median Hous	ing Value		\$255,440			
			Median Gross Rent		\$1,229				
			Families Below Poverty Level			8.2%			

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%. (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, non-classifiable establishments represent the largest percentage of businesses at 34.5 percent, followed by the services industry at 31.6 percent and finance, insurance, and real estate at 9.6 percent. According to the Georgia Department of Labor, top employers throughout the assessment area include AT&T, Delta Air Lines, Inc., Emory University & Emory Healthcare, Northside Hospital, Piedmont Healthcare, Publix Super Markets, The Home Depot, Inc., The Kroger Company, United Parcel Service, and WellStar Health Systems.

The unemployment rates decreased for all counties in 2021 and 2022. In addition, unemployment rates were generally in line with or below the state and national averages during the evaluation period. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

	Unemployment Rates 2020	2021	2022
Area	%	%	%
Barrow County	5.1	3.0	2.5
Bartow County	6.2	3.5	2.9
Carroll County	6.3	3.7	3.1
Cherokee County	4.8	2.6	2.3
Clayton County	10.3	6.3	3.9
Cobb County	5.9	3.3	2.6
Coweta County	6.1	3.4	2.7
Dawson County	4.6	2.7	2.5
DeKalb County	7.9	4.5	3.1
Douglas County	7.4	4.3	3.3
Fayette County	5.4	2.9	2.6
Forsyth County	4.5	2.5	2.3
Fulton County	7.3	4.6	3.2
Gwinnett County	6.3	3.5	2.7
Henry County	7.3	4.2	3.2
Newton County	7.1	4.4	3.4
Paulding County	5.3	3.0	2.6
Pickens County	4.8	2.8	2.6
Rockdale County	7.6	4.6	3.5
Walton County	5.4	3.2	2.8
Georgia	6.5	3.9	3.0
National Average	8.1	5.4	3.6

## **Competition**

The Atlanta MSA assessment area is highly competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 78 FDIC-insured financial institutions operating 1,017 offices in this assessment area. Of these institutions, United Community Bank ranked ninth with a 2.2 percent deposit market share. The top five financial institutions accounted for 72.1 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 952 lenders reported 217,770 residential mortgage loans for \$74.4 billion in the Atlanta MSA assessment area. United Community Bank ranked 32<sup>nd</sup> with a market share of 0.8 percent by number of loans. The top five home mortgage lenders accounted for 21.3 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 308 lenders reported 246,182 small business loans for \$7.4 billion in the Atlanta MSA assessment area. United Community Bank ranked 17<sup>th</sup> with a market share of 1.0 percent by number of loans. The top five small business lenders accounted for 49.0 percent of total market share by number of loans.

## **Community Contact**

Examiners used an existing community contact that was recently completed with a non-profit organization that serves the Atlanta MSA assessment area. The organization provides access to quality affordable housing to low- and moderate-income individuals and families within the assessment area.

The contact stated the area is in need of affordable housing, as new homes prices are out of reach for low- and moderate- income families. The contact also stated there are not enough loans targeted to those who do not have credit, which limits the accessibility to home mortgage financing. The organization is working to build and redevelop affordable new homes for the low- and moderate-income population. Additionally, the contact provided positive feedback on the local banks and their ability to serve the area.

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

Considering information obtained from the community contact, demographic data, and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area, as 38.5 percent of families are low- and moderate-income. In addition, small business loans are a credit need and opportunity within the Atlanta MSA assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (94.0 percent) and the large number of businesses with four or fewer employees (56.5 percent) support the conclusion that there is a need for small business lending.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN ATLANTA MSA ASSESSMENT AREA

#### **LENDING TEST**

Lending levels in the Atlanta MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank has made a relatively high level of community development loans.

## **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 6,553 home mortgage loans totaling \$1.8 billion and 7,013 small business loans totaling \$1.0 billion in the Atlanta MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

# Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below aggregate performance and demographic data. However, lending in moderate-income geographies exceeded aggregate performance and demographic data.

#### Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was slightly below aggregate performance and demographic data. Lending in moderate-income census tracts was comparable to aggregate performance and demographic data.

#### **Borrower Profile**

The distribution of loans reflects adequate penetration among individuals of different income levels and businesses of different sizes.

#### Home Mortgage Loans

The distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. Although lending to low-income borrowers was significantly below demographic data, lending was in line with aggregate performance. Lending to moderate-income borrowers was comparable to aggregate performance and demographic data.

#### Small Business Loans

The borrower distribution of small business loans reflects adequate penetration among business customers of different sizes. The bank's lending was comparable to aggregate performance, but was well below demographic data. Given the level of competition within this assessment area, lending is adequate.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Atlanta MSA assessment area. United Community Bank originated 20 community development loans totaling \$40.5 million. This amount represents 57.1 percent, by number, and 30.5 percent, by dollar volume, of total community development loans originated in Georgia. Community development lending has increased by number and dollar volume, since the previous evaluation, when 11 community development loans totaling \$24.1 million were made. Regarding the community development purpose, nine loans supported economic development and 11 loans supported revitalization or stabilization. Below are examples of the bank's community development loans originated during the evaluation period.

- A loan totaling \$6.6 million to a municipality to improvements to the city's water supply system. The loan will improve local citizens' quality and reliability of water supply. The majority of the geographies and residents are low- or moderate-income individuals.
- A loan totaling \$2.3 million to construct a warehouse located in a moderate-income census tract. The loan will help revitalize and stabilize the area by attracting new business and will create new jobs.
- A PPP loan totaling \$1.9 million to a business operating in a moderate-income census tract. The loan provides assistance in maintaining business operations and retaining jobs, thereby promoting revitalization and stabilization.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Atlanta MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

### **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Atlanta MSA assessment area. The bank made or retained 113 investments totaling \$39.2 million, or 79.2 percent by dollar, of Georgia's community development investments. This includes approximately \$176,000 in grants or donations and approximately \$34.1 million in prior period investments. This represents a decrease in number and a slight decrease in dollar volume of qualified investments from the prior evaluation, when 148 investments totaling \$41.8 million were made in this assessment area. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment area. A majority of grants and donations targeted community services.

Below are examples of qualified investments that benefited the Atlanta MSA assessment area.

- In 2022, the bank invested \$5.0 million in an LIHTC fund to provide affordable housing for low- and moderate-income individuals.
- From 2021 through 2023, the bank made seven donations totaling \$26,750 to a nonprofit organization that builds affordable housing for low- and moderate-income individuals.
- The bank continues to hold three prior period municipal bonds totaling \$28.0 million purchase or rehabilitate low-income apartment buildings. These investments promote affordable housing.

### **SERVICE TEST**

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconvenience certain portions of the assessment area. 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. United Community Bank operates 33 branches in the Atlanta MSA assessment area, which represents 50.8 percent of the bank's branches in the state. As a result of the 2020 Census, the incomeclassification of 10 branches changed in the Atlanta MSA assessment area. However, the overall number of branches in low- and moderate income census tracts did not change based on 2020 Census re-classifications. The branch distribution in low-income census tracts is below the percent of population in those census tracts, but the percent of branches in moderate-income census tracts is well above the percent of population in those census tracts. The distribution of ATMs is consistent with the branch distribution, with two additional remote ATMs located in moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census Tracts		Population		Branches		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%
Low	111	7.7	369,058	6.3	1	3.0	-	-	-	-
Moderate	338	23.5	1,418,054	24.2	12	36.4	-	-	-	-
Middle	452	31.4	1,945,433	33.2	11	33.3	-	-	-	-
Upper	488	33.9	1,998,949	34.1	7	21.2	2	100.0	2	100.0
NA	51	3.5	131,563	2.2	2	6.1	-	-	-	-
Totals	1,440	100.0	5,863,057	100.0	33	100.0	2	100.0	2	100.0

# **Community Development Services**

United Community Bank provides a relatively high level of community development services in this assessment area. During the evaluation period, bank employees participated in 76 community development services totaling 290 hours. This performance represents 38.4 percent by number and 37.4 percent by hours of all activities in the state, which is below the assessment area's share of statewide branches at 50.8 percent. However, this performance reflects an increase since the previous evaluation when the bank performed 52 community development services in the Atlanta MSA, which reflects the bank's responsiveness to community needs in the assessment area. The following are examples of community development services provided in the assessment area.

- In 2021 and 2022, a bank employee served on the Board of a housing coalition that works to improve the supply, quality, and access to affordable housing for low- and moderate-income individuals.
- From 2021 to 2023, multiple bank employees taught financial literacy sessions for students from low- and moderate-income families. The employees discussed spending, saving, investing, and donating money.
- In 2020, a bank employee served on the Board of a nonprofit organization that assists homeless individuals with basic necessities and food.

# GEORGIA NON MSA ASSESSMENT AREA – Full-Scope Review

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

The Georgia Non MSA assessment area consists of 12, non-contiguous counties, in their entirety: Banks, Chattooga, Fannin, Gilmer, Habersham, Jackson, Lumpkin, Rabun, Towns, Union, Ware, and White. Although the counties are non-contiguous, they share similar characteristics and demographics. Therefore, the counties were combined into one assessment area. United Community Bank operates 17, or 26.2 percent, of its Georgia branches in this assessment area. By dollar volume, the assessment area accounts for 23.9 percent of the rated area loans and 35.1 percent of the rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area changed as a result of the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	2	0
Moderate	3	12
Middle	42	49
Upper	24	39
Income Not Assigned	0	1
Total	71	101
Source: 2015 ACS Data and 2020 U.S. Census Data	ı	

The FFIEC has designated certain Georgia Non MSA assessment area middle-income census tracts as distressed and/or underserved. The distressed designation is based on high unemployment rates, poverty rates, and/or population losses. The underserved designation is based on areas being rural and remote. In 2020 and 2021, of the 42 middle-income census tracts, five were designated as distressed based on high poverty rates, and eight were designated as underserved based on being rural and remote. In 2022, of the 49 middle-income census tracts, four remained designated as distressed based on poverty, and 12 additional tracts were designated as underserved based being rural and remote.

# **Economic and Demographic Data**

The following table presents select demographic information from the 2020 US Census and 2022 D&B data.

Demogra	aphic Inforn	nation of th	e Assessment	Area				
Assessment Area: Georgia Non MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	101	0.0	11.9	48.5	38.6	1.0		
Population by Geography	373,360	0.0	9.5	52.6	37.1	0.8		
Housing Units by Geography	180,931	0.0	9.4	55.4	34.5	0.8		
Owner-Occupied Units by Geography	104,019	0.0	7.3	54.0	38.0	0.7		
Occupied Rental Units by Geography	34,660	0.0	16.2	54.0	28.3	1.5		
Vacant Units by Geography	42,252	0.0	8.9	60.1	30.7	0.4		
Businesses by Geography	38,468	0.0	8.8	50.8	39.8	0.5		
Farms by Geography	1,885	0.0	4.6	58.0	36.3	1.1		
Family Distribution by Income Level	96,192	16.8	16.8	19.3	47.2	0.0		
Household Distribution by Income Level	138,679	20.5	14.2	16.4	48.9	0.0		
Median Family Income Non-MSAs - GA		\$55,969	Median Housing Value			\$180,160		
	,		Median Gross	Rent		\$747		
			Families Belo	w Poverty Le	evel	10.0%		

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%. (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 31.3 percent, followed by non-classifiable establishments at 25.4 percent and retail trade at 11.0 percent. According to the Georgia Department of Labor, some of the top employers throughout the assessment area include Georgia Department of Corrections, Walmart, Ingles, Inc., Amazon.com Services, Inc., and Piedmont College.

# **Competition**

The Georgia Non MSA assessment area is competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 23 FDIC-insured financial institutions operating 78 offices in this assessment area. Of these institutions, United Community Bank ranked first with a 39.3 percent deposit market share. The top five financial institutions accounted for 72.4 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 547 lenders reported 15,483 residential mortgage loans for \$4.3 billion in the Georgia Non MSA assessment area. United Community Bank ranked first with a market share of 9.6 percent by number of loans. The top five home mortgage lenders accounted for 31.1 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 108 lenders reported 8,677 small business loans for \$267.0 million in the Georgia Non MSA assessment area. United Community Bank ranked second with a market share of 12.3 percent by number of loans. The top five small business lenders accounted for 53.8 percent of total market share by number of loans.

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

Considering information obtained from the demographic data, and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area, as 33.6 percent of the families are low- and moderate-income. Further, 10.0 percent of families are below the poverty level. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (91.0 percent) and the large number of businesses with four or fewer employees (62.9 percent) support the conclusion that there is a need for small business lending.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA NON MSA ASSESSMENT AREA

#### **LENDING TEST**

Lending levels in the Georgia Non MSA assessment area reflect excellent responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area, and the distribution of loans reflects excellent penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made an adequate level of community development loans.

# **Lending Activity**

United Community Bank's lending levels reflect excellent responsiveness to assessment area credit needs. During the review period, United Community Bank originated 5,011 home mortgage loans totaling \$948.8 million and 3,283 small business loans totaling \$266.7 million in the assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The bank's geographic distribution of loans reflects excellent penetration throughout the assessment area. There were no low-income census tracts in the assessment area in 2022.

# Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area. The bank originated zero loans in low-income census tracts in 2020 and 2021. However, lending performance is in line with aggregate performance, as demographic data indicates limited lending opportunities. Performance in moderate-income census tracts was below demographic data, but exceeded aggregate performance. It is noted that United Community Bank ranked 1st in the assessment area for lending in low- and moderate-income geographies.

#### Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. Lending in low-income geographies was comparable to aggregate performance and demographic data. It is noted that United Community Bank ranked 2<sup>nd</sup> in the assessment area for lending in low-income geographies. Performance in moderate-income geographies was slightly below, but comparable to, aggregate performance and demographic data. It is noted that United Community Bank ranked 3<sup>rd</sup> in the assessment area for small business lending in moderate-income geographies.

#### **Borrower Profile**

The distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loans reflects excellent penetration among borrowers of different income levels. Although lending to low-income borrowers was well below demographic data, lending exceeded aggregate performance. Lending to moderate-income borrowers exceeded aggregate performance, but was below demographic data. However, United Community Bank ranked 1<sup>st</sup> in the assessment area for lending to low- and moderate-income borrowers.

#### Small Business Loans

The borrower distribution of small business loans reflects good penetration among business customers of different sizes. The bank's lending was significantly below demographic data, but was comparable to aggregate performance. In 2022, performance increased 17.1 percent, but remained below demographics. However, given the level of competition within the assessment area, lending is considered good.

### **Community Development Loans**

United Community Bank has made an adequate level of community development loans in the Georgia Non MSA assessment area. United Community Bank originated two community development loans totaling \$8.0 million. This amount represents 5.7 percent, by number, and 6.0 percent, by dollar volume, of total community development loans originated in Georgia. Community development lending, by number of loans, has remained constant, while dollar volume increased, since the previous evaluation, when two community development loans totaling \$4.3 million were made. Regarding the community development purpose, one loan supported community services and one loan supported revitalization or stabilization. Below are the bank's community development loans originated during the evaluation period.

- A loan totaling \$6.0 million to a school Board where four of the five schools have at least 50 percent of students qualify for free or reduced lunch. The loan will help to provide community service needs to low- and moderate-income students.
- A loan totaling \$1.9 million to fund the improvements and expansion of a mobile home park located in a moderate-income census tract. The loan will provide additional mobile home sites and added security measures, thereby promoting revitalization and stabilization.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Georgia Non MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

### **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Georgia Non MSA assessment area. The bank made 121 donations totaling \$369,000, or 0.7 percent by dollar, of Georgia's community development investments. This represents a decrease in number, but a significant increase in dollar volume, of qualified investments from the prior evaluation, when 178 investments totaling \$106,000 were made in this assessment area. The majority of United Community Bank's grants and donations targeted community services.

Below are examples of qualified donations that benefited the Georgia Non MSA assessment area.

- In 2023, the bank donated \$250,000 to expand a medical facility participating in the Georgia HEART Program. The program increases funding to rural and critical access hospitals throughout the state of Georgia, which provide community serves to the assessment area.
- From 2020 to 2022, the bank donated \$27,000 towards a needs-based, higher education scholarship. The scholarship targets low- and moderate-income individuals, thereby, providing community services.
- From 2020 to 2022, the bank made 26 donations totaling \$2,150 to a non-profit organization that primarily services low- and moderate-income individuals through the provision of essential needs and fighting food insecurity, thereby, providing community services.

### **SERVICE TEST**

Delivery systems are readily accessible to all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconvenience certain portions of the assessment area. The bank is a leader in providing community development services.

## **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the assessment area. United Community Bank operates 17 branches in the Georgia Non MSA assessment area, which represents 26.2 percent of the bank's branches in the state. As a result of the 2020 Census, the income classification of two branches changed in the Georgia Non MSA assessment area. Two distressed middle-income census tracts were reclassified to moderate-income census tracts. The branch distribution in moderate-income census tracts significantly exceeds the percent of population in those census tracts. One branch is located in a middle-income census tract that was designated as distressed or underserved during the review period. The distribution of ATMs is consistent with the branch distribution, with three additional remote ATMs located in distressed or underserved middle-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census Tracts		Population		Branches		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%
Low	-	-	-	-	-	-	-	-	-	-
Moderate	12	11.9	35,408	9.5	5	29.4	-	-	-	-
Middle	49	48.5	196,343	52.6	7	41.2	-	-	-	-
Upper	39	38.6	138,445	37.1	5	29.4	1	100.0	-	-
NA	1	1.0	3,164	0.8	_	-	-	-	-	-
Totals	101	100.0	373,360	100.0	17	100.0	1	100.0	-	-

# **Community Development Services**

United Community Bank is a leader in providing community development services in this assessment area. During the evaluation period, bank employees participated in 90 community development services totaling 303 hours. This performance represents 45.5 percent by number and 39.1 percent by hours of all activities in the state, which is well above the assessment area's share of statewide branches at 26.2 percent. In addition, this performance reflects a slight increase since the previous evaluation when the bank performed 81 community development services in the Georgia Non MSA, which reflects the bank's responsiveness to community needs in the assessment area. Community development services equate to 1.7 services and 5.4 hours per branch per year. The following are examples of community development services provided in the assessment area.

- From 2020 to 2021, a bank employee served as the Treasurer of a nonprofit organization that provides free meals to students from low-income families who lack food on the weekends.
- From 2020 to 2022, a bank employee served on the Finance committee of a nonprofit community service organization that provides housing for battered women and children.
- From 2021 to 2023, several bank employees provided financial literacy training that included banking basics, saving, investing, and budgeting to children from low- and moderate-income families.

# 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 five 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	<b>Lending Test</b>	Investment Test	Service Test
Athens MSA	Consistent	Consistent	Below
Brunswick MSA	Consistent	Below	Consistent
Gainesville MSA	Consistent	Consistent	Below
Rome MSA	Below	Below	Consistent
Savannah MSA	Below	Consistent	Consistent

The following facts and data support the conclusions for each limited-scope assessment area. Also included are details regarding the number and dollar volume of home mortgage, small business, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Additional information is in the Limited-Scope Assessment Area Appendices.

#### **Athens MSA Assessment Area**

The Athens MSA assessment area consists of Clarke, Madison, and Oconee counties. United Community Bank 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	#	\$(000)
Home Mortgage Loans	282	70,954
Small Business Loans	489	54,782
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	1	7,049
Donations	6	5
CD Services	2	19 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/20	020 to 9/30/2023	

# Geographic Distribution and Borrower Profile

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

#### **Brunswick MSA Assessment Area**

The Brunswick MSA assessment area consists of Glynn County. United Community Bank 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	#	\$(000)
Home Mortgage Loans	461	122,040
Small Business Loans	419	39,901
Community Development Loans	=	-
Investments (New)	=	-
Investments (Prior Period)	=	-
Donations	7	15
CD Services	6	11 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

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

#### Gainesville MSA Assessment Area

The Gainesville MSA assessment area consists of Hall County. United Community Bank 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	#	\$(000)
Home Mortgage Loans	810	190,642
Small Business Loans	904	114,297
Community Development Loans	6	43,965
Investments (New)	=	-
Investments (Prior Period)	=	-
Donations	28	45
CD Services	2	17 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		_

# Geographic Distribution and Borrower Profile

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

#### Rome MSA Assessment Area

The Rome MSA assessment area consists of Floyd County. United Community Bank 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	#	\$(000)
Home Mortgage Loans	559	101,214
Small Business Loans	507	62,077
Community Development Loans	1	1,185
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	43	45
CD Services	7	34 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# **Geographic Distribution and Borrower Profile**

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

#### Savannah MSA Assessment Area

The Savannah MSA assessment area consists of Chatham County. United Community Bank 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	#	\$(000)
Home Mortgage Loans	420	141,220
Small Business Loans	905	168,544
Community Development Loans	1	1,383
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	5	16
CD Services	14	95 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

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

#### NORTH CAROLINA

# CRA RATING FOR NORTH CAROLINA: <u>SATISFACTORY</u>

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

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

United Community Bank has designated six assessment areas within the State of North Carolina, which is an overall increase in the number of assessments areas when compared to the prior evaluation. Specifically, the bank merged with Aquesta Bank in October 2021, resulting in the addition of the Charlotte MSA and Wilmington MSA assessment areas. The bank closed a branch in April 2022, which removed the Fayetteville MSA assessment area. United Community Bank operates 37, or 20.3 percent, of its total branch offices in North Carolina. North Carolina accounts for 19.7 percent of bank-wide loans and 16.1 percent of the bank-wide deposits. Overall, United Community Bank ranks 8<sup>th</sup> in the state in deposit market share at 0.7 percent. Competitor institutions in the North Carolina assessment areas include Bank of America, N.A., Truist Bank, First-Citizens Bank & Trust Company, Wells Fargo Bank, N.A., and Live Oak Banking Company.

### SCOPE OF EVALUATION – NORTH CAROLINA

The evaluation of the North Carolina performance considered the operations of United Community Bank in six assessment areas detailed in the Description of Assessment Areas. 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 North Carolina Non MSA and Raleigh MSA assessment areas. Limited scope areas included the Asheville MSA, Charlotte MSA, and Wilmington MSA assessment areas. The Fayetteville MSA assessment area was reviewed for 2020 and 2021 data. During the review period, home mortgage lending was given more weight when considering the number of dollar volume of these products in five assessment areas. Small business lending was given more weight than home mortgage lending when considering the number and dollar volume of

these products for the Fayetteville MSA assessment area. Refer to the following table for the distribution of lending, deposits, and branches in each assessment area.

A A	Loan	s	Depos	sits	Branches		
Assessment Area	\$(000s)	%	\$(000s)	%	#	%	
Asheville MSA	412,836	20.0	301,060	8.7	3	8.1	
Charlotte MSA	88,484	4.3	483,702	14.0	7	18.9	
Fayetteville MSA	23,433	1.1			0*	0.0	
North Carolina Non MSA	820,232	39.6	1,738,086	50.3	17	46.0	
Raleigh MSA	715,996	34.6	873,458	25.3	9	24.3	
Wilmington MSA	7,616	0.4	58,060	1.7	1	2.7	
North Carolina Total	2,068,597	100.0	3,454,366	100.0	37	100.0	

Source: 2020, 2021, & 2022 HMDA and CRA LARs; Branch records as of 06/30/2023; FDIC Summary of Deposits as of 6/30/2023 \*The Fayetteville MSA Assessment Area was removed on April 1, 2022 due to the branch closure.

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH CAROLINA

#### LENDING TEST

The Lending Test rating is High Satisfactory. Lending levels in North Carolina reflect good responsiveness to the assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans. Performance in the Charlotte MSA, North Carolina Non MSA, and Raleigh MSA assessment areas is consistent with the rated area performance. Performance in the Asheville MSA, Fayetteville MSA, and Wilmington MSA assessment areas is below the performance conclusion.

#### **Lending Activity**

Overall, United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. Refer to each North Carolina assessment area for details.

### **Geographic Distribution**

Overall, the geographic distribution of loans reflects good penetration throughout the North Carolina assessment areas. Performance in the North Carolina Non MSA and Raleigh MSA assessment areas is consistent with the rated area performance. Performance in the remaining assessment areas is below the rated area performance.

#### **Borrower Profile**

Overall, the distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes in North Carolina. Performance in four of

the assessment areas is consistent with the rated area performance, and the performance of the North Carolina Non MSA and Fayetteville assessment areas is above the rated area performance.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in North Carolina. During this evaluation period, the bank originated 22 community development loans totaling approximately \$120.5 million. This performance represents 18.3 percent, by number, and 27.7 percent, by dollar, of total bank-wide community development loans. Community development lending has increased since the previous evaluation, when 11 community development loans totaling approximately \$15.7 million were made. Additionally, five loans totaling \$38.6 million were originated outside of the assessment areas but in a broader statewide area that includes the assessment areas. Since the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide lending. The bank's performance in the Charlotte MSA, North Carolina Non MSA, and Raleigh MSA assessment areas is consistent with this conclusion. Performance in the Asheville MSA, Fayetteville MSA, and Wilmington MSA assessment areas is below the performance conclusion. The following table illustrates the community development loans by assessment area and purpose.

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Asheville MSA	-	-	-	-	-	-	-	-	-	-
Charlotte MSA	-	-	-	-	3	8,702	2	34,697	5	43,399
Fayetteville MSA	-	-	-	-	-	-	1	1,707	1	1,707
North Carolina Non MSA	2	7,570	1	2,500	-	-	4	8,067	7	18,137
Raleigh MSA	1	450	1	5,000	-	-	2	13,200	4	18,650
Wilmington MSA	-	-	-	_	-	-	-	-	-	-
State-wide Activities	-	-	-	-	-	-	5	38,616	5	38,616
Total	3	8,020	2	7,500	3	8,702	14	96,287	22	120,509

The analysis for each full-scope North Carolina assessment area includes a detailed discussion of community development loans. Below are examples of the bank's state-wide activities in North Carolina.

- A loan totaling \$31.3 million to construct a retail shopping center located in a moderate-income census tract. This loan revitalizes and stabilizes the area by attracting businesses and residents and creating employment.
- A PPP loan totaling \$2.0 million to a business operating in a low-income census tract. The loan provided assistance in maintaining business operations, thereby promoting revitalization and stabilization.

• A loan totaling \$1.4 million in a low-income census tract to purchase an apartment complex. This loan will help revitalize and stabilize the area by attracting new residents.

#### **INVESTMENT TEST**

The Investment Test performance is High Satisfactory. The bank has a significant level of qualified investments in North Carolina. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. The bank's performance in the Asheville MSA, North Carolina Non MSA, and Raleigh MSA assessment areas is consistent with this conclusion. Performance in the Charlotte MSA, Fayetteville MSA, and Wilmington MSA assessment areas was below the performance conclusion.

# **Investment and Grant Activity**

United Community Bank has a significant level of qualified investments in North Carolina. The bank made or maintained 99 investments totaling \$26.2 million throughout the state, representing 7.9 percent of total bank-wide qualified community development investments by dollar volume. This represents an increase in number, and comparable by dollar, volume since the previous evaluation, when 75 qualified investments totaling \$26.2 million were made in the state. Included in this number is three qualified investments totaling \$5.5 million that benefited the broader state-wide area in Georgia that includes the assessment areas. Additionally, two prior period investment totaling \$20.6 million benefited outside of the assessment areas but in a broader statewide area. Because the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide investments. Further, 11 bank-wide qualified investments targeted North Carolina, as noted in the bank-wide Investment Test analysis. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment areas. A majority of donations targeted community services. The following table details the bank's qualified investments, grants, and donations by community development purpose.

	Qualifi	ed Investn	nents b	y Rated Ai	rea – N	orth Caro	lina			
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Asheville MSA	4	2	17	16	13	11	-	-	34	29
Charlotte MSA	1	5	6	11	-	-	-	_	7	16
Fayetteville MSA	-	-	1	1	-	-	-	-	1	1
North Carolina Non MSA	-	-	33	29	-	-	3	1	36	30
Raleigh MSA	3	7	11	35	1	1	1	53	16	96
Wilmington MSA	-	-	-	-	-	-	-	-	-	-
State-wide Activities	4	26,057	1	<1	-	-	-	-	5	26,057
Total	12	26,071	69	92	14	12	4	54	99	26,229
Source: Bank Records;										

Below are examples of the bank's qualified investments that impacted multiple assessment areas within the state or that benefited the broader state-wide area in North Carolina.

- In 2021, the bank invested \$10.0 million in an MBS secured by a 144-unit apartment complex where the units target very low- and low-income borrowers creating affordable housing. This investment benefited the broader state-wide area.
- The bank continues to hold \$10.6 million in a prior period LIHTC fund that provides affordable housing for low- and moderate-income individuals. This investment benefited the broader state-wide area.
- The bank continues to hold \$5.0 million in a prior period LIHTC fund that provides affordable housing for low- and moderate-income individuals. The fund also invests in community revitalization projects and provides tenants with economic and educational opportunities. This investment benefited the Asheville MSA, North Carolina Non MSA, and Raleigh MSA assessment areas.

#### SERVICE TEST

The Service Test rating for this institution is High Satisfactory in North Carolina. United Community Bank's delivery systems are accessible to essentially all portions of the institution's North Carolina 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 and/or to low and moderate-income individuals. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, and the bank has provided an adequate level of community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are accessible to essentially all portions of the institution's assessment areas. United Community Bank operates 37 branches in North Carolina, which represents 20.3 percent of bank-wide branches. As a result of the 2020 Census, the income classification of six branches changed in North Carolina. The net effect of the census changes resulted in an increase of three branches in the low-income census tracts and a decrease of five branches in moderate-income tracts. The branch distribution in low-income census tracts more than doubles the percent of population in those census tracts, while the percent of branches in moderate-income census tracts is less than half the percentage of population in those census tracts. The bank has nine branches in distressed or underserved middle-income census tracts. The distribution of ATMs is consistent with the branch distribution, with one remote ATM located in a distressed or underserved middle-income census tract. The following table reflects the bank's branch distribution by tract income level in North Carolina.

Tract Income Level	el Census Trac		nsus Tracts Population		Branches		Open Branches		<b>Closed Branches</b>	
-	#	%	#	%	#	%	#	%	#	%
Low	49	5.3	178,066	4.8	4	10.8	-	-	-	-
Moderate	207	22.4	811,860	21.9	4	10.8	-	-	-	-
Middle	346	37.5	1,430,550	38.7	16	43.2	1	11.1	3	75.0
Upper	296	32.1	1,228,194	33.2	12	32.5	8	88.9	1	25.0
NA	25	2.7	52,160	1.4	1	2.7	-	-	-	-
Totals	923	100.0	3,700,830	100.0	37	100.0	9	100.0	4	100.0

### **Changes in Branch Locations**

To the extent changes have been made, the institution's record of opening and closing branches has generally not adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened nine branches following the acquisition of Aquesta Bank, which resulted in the delineation of the Charlotte Assessment Area. In addition, the bank closed four branches during the evaluation period. None of the opened or closed branches were in low- or moderate-income census tracts. However, three of the branch closures that were located in middle-income census tracts served three low-income census tracts and eight moderate-income census tracts, which affected less than five percent of the total low- and moderate-income census tracts. None of the branch openings serve low- and moderate-income census tracts. As such, this area will not be further discussed in the North Carolina assessment areas.

# **Community Development Services**

United Community Bank has provided an adequate level of community development services in North Carolina. Bank employees and directors provided 70 qualifying services totaling 506 hours throughout the North Carolina assessment areas. This performance represented 12.1 percent, by number, of the bank-wide community development services. This performance reflects a slight decrease since the previous evaluation when the bank performed 74 community development services in North Carolina. Community development services equate to 0.7 services and 5.11 hours per branch per year.

Community development services that benefited the larger state-wide area of North Carolina, totaled one activity for nine hours and is included as the bank met the community development service needs of its assessment areas. The activity included bank personnel serving on the Advisory Board for a community development organization, which provides after-school programs to students from low- and moderate-income families. The following table details the bank's community development services activity by assessment area and purpose during the evaluation period.

Community De	velopmo	ent Serv	ices in	North C	arolina	by Asses	sment	Area		
Assessment Area	_	Affordable Housing		-		nomic opment		italize abilize	Totals	
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Asheville MSA	2	33	-	-	10	219	-	-	12	252
Charlotte MSA	1	1	6	14	-	-	-	-	7	15
North Carolina Non MSA	1	1	35	136	7	62	3	20	46	219
Fayetteville MSA	-	-	_	-	-	-	-	-	-	-
Raleigh MSA	-	-	4	11	-	-	-	-	4	11
Wilmington MSA	-	-	_	-	-	-	-	-	-	-
<b>Total in Assessment Areas</b>	4	35	45	161	17	281	3	20	69	497
State-wide Activities	-	-	1	9	-	-	-	-	1	9
Totals	4	35	46	170	17	281	3	20	70	506
Source: July 1, 2020 through September 30	), 2023 Bar	ık Records		•		•		•		•

# NORTH CAROLINA NON MSA ASSESSMENT AREA – Full-Scope Review

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA NON MSA ASSESSMENT AREA

The North Carolina Non MSA assessment area consists of 13, non-contiguous counties, in their entirety: Avery, Cherokee, Clay, Columbus, Duplin, Graham, Jackson, Macon, Mitchell, Swain, Transylvania, Watauga, and Yancey. The counties share similar characteristics and demographics and are combined into one assessment area.

United Community Bank operates 17, or 46.0 percent, of its rated area branches in the North Carolina Non MSA assessment area. By dollar volume, the assessment area accounts for 39.6 percent of rated area loans and 50.3 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area increased due to county census tract changes reported in the 2020 U.S. Census. The following table reflects the changes in census tract incomelevel and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	-	-
Moderate	11	19
Middle	64	75
Upper	17	21
Income Not Assigned	1	3
Total	93	118
Source: 2015 ACS Data and 2020 U.S. Census Data		

The FFIEC designated certain Non MSA assessment area middle-income census tracts as distressed and/or underserved. Census tracts are designated distressed based on high unemployment rates, poverty rates, and/or population losses in the tracts. Census tracts are designated underserved based on tracts being rural and remote. In 2020 and 2021, the FFIEC designated 19 middle-income census tracts in the assessment area as distressed based on high poverty rates and designated 27 middle-income census tracts as underserved based on being rural and remote. In 2022, the number of middle-income census tracts designated as distressed based on high poverty rates decreased to nine, while the number of middle-income census tracts designated underserved based on being rural and remote increased to 29 census tracts.

# **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census data and 2022 D&B data.

Demographic Informa	ation of the	North Car	olina Non MS	A Assessmen	t Area	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	118	0.0	16.1	63.6	17.8	2.5
Population by Geography	379,722	0.0	15.0	62.4	20.8	1.8
Housing Units by Geography	234,892	0.0	13.3	62.5	22.6	1.6
Owner-Occupied Units by Geography	114,593	0.0	13.8	67.6	17.7	1.0
Occupied Rental Units by Geography	45,105	0.0	16.0	56.2	22.9	4.9
Vacant Units by Geography	75,194	0.0	11.0	58.4	30.0	0.7
Businesses by Geography	36,726	0.0	12.4	59.5	24.2	3.9
Farms by Geography	2,052	0.0	14.6	67.1	16.4	2.0
Family Distribution by Income Level	100,628	20.2	18.5	20.7	40.7	0.0
Household Distribution by Income Level	159,698	24.4	16.6	16.9	42.1	0.0
Median Family Income Non-MSAs – North Carolina		\$57,962	Median Housing Value			\$186,740
			Median Gross	s Rent		\$730
			Families Belo	ow Poverty L	evel	11.6%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 32.9 percent, followed by non-classifiable establishments at 21.4 percent and retail trade at 11.8 percent. Top employers in the assessment area include Columbus County Government, Butterball LLC, Western Carolina University, Eastern Band of Cherokee Indians, and Appalachian State University.

Unemployment rates for all counties decreased for all counties in 2021 and 2022. In addition, unemployment rates were generally in line with or below the state and national averages during the evaluation period. However, a select number of counties have not recovered as quickly as the state and national averages. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

	Unemployme	nt Rates	
<b>A</b>	2020	2021	2022
Area	%	%	0/0
Avery	6.3	4.1	3.3
Cherokee	7.9	5.1	4.0
Clay	7.4	5.1	4.0
Columbus	8.0	6.3	4.3
Duplin	5.6	4.5	3.7
Graham	9.8	6.9	5.3
Jackson	7.5	4.6	3.8
Macon	6.7	4.3	3.5
Mitchell	7.7	5.2	4.2
Swain	8.3	4.6	3.2
Transylvania	6.1	4.2	3.5
Watauga	6.3	3.8	3.3
Yancey	6.6	4.4	3.6
State of North Carolina	7.3	4.9	3.6
National Average	8.1	5.4	3.6
Source: Bureau of Labor Statistics			

# **Competition**

The assessment area is highly competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 23 FDIC-insured financial institutions operating 92 offices in this assessment area. Of these institutions, United Community Bank ranked second with a 19.5 percent deposit market share. The top five financial institutions accounted for 76.0 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 545 lenders reported 11,854 residential mortgage loans for \$3.3 billion in the assessment area. United Community Bank ranked second with a market share of 6.8 percent by number of loans. The top five home mortgage lenders accounted for 33.3 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 111 lenders reported 9,469 small business loans for \$369.9 million in the assessment area. United Community Bank ranked fourth with a market share of 8.6 percent by number of loans. The top five small business lenders accounted for 49.5 percent of total market share by number of loans.

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

Considering information obtained from demographic and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area. There are 11.6 percent of families below the poverty level and 38.7 percent of the families are low- and moderate-income, while median housing value and age of housing stock are high. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (89.1 percent) and the large number of businesses with four or fewer employees (63.5 percent) support the conclusion that there is a need for small business lending. With 47.5 percent of the census tracts in the assessment area categorized as moderate- or underserved middle-income census tracts, there is a need for assistance in revitalizing and stabilizing these census tracts.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN NORTH CAROLINA NON MSA ASSESSMENT AREA

#### **LENDING TEST**

Lending levels in the North Carolina Non MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area, and the distribution of loans reflects good penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank has made a relatively high level of community development loans.

# **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 2,865 home mortgage loans totaling \$632.4 million and 2,532 small business loans totaling \$187.9 million in the North Carolina Non MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The geographic distribution of loans reflects good penetration throughout the assessment area. This assessment area does not contain low-income geographies.

## Home Mortgage Loans

The geographic distribution of home mortgage loans reflects good penetration throughout the assessment area. Lending in moderate-income census tracts was below demographic data and aggregate performance. However, United Community Bank ranks 4<sup>th</sup> in the assessment area in lending to moderate-income tracts.

#### Small Business Loans

The geographic distribution of small business loans reflects good penetration throughout the assessment area. Lending in moderate-income geographies was in line with demographic data and aggregate performance. Additionally, United Community Bank ranks 5<sup>th</sup> in the assessment area for lending in moderate-income tracts.

## **Borrower Profile**

The distribution of borrowers reflects good penetration among borrows of different income levels and business customers of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loans reflects good penetration among borrowers of different income levels. Although lending to low-income borrowers was significantly below demographic data, lending exceeded aggregate performance. Further, United Community Bank ranks 3<sup>rd</sup> in the assessment area for lending to low-income borrowers. Lending to moderate-income borrowers was below demographic data, but slightly exceeded aggregate performance. Similarly, United Community Bank ranks 3<sup>rd</sup> in the assessment area for lending to moderate-income borrowers.

#### Small Business Loans

The distribution of small business loans reflects adequate penetration among business customers of different sizes. Lending performance was significantly below demographic data and below aggregate performance. In 2022, performance increased 21.8 percent, but remained below demographic data. Given the level of competition within the assessment area, performance is considered adequate.

#### **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the North Carolina Non MSA assessment area. United Community Bank originated seven community development loans totaling \$18.1 million. This amount represents 31.8 percent, by number, and 15.1 percent, by dollar volume, of total community development loans originated in North Carolina. Community development lending has significantly increased since the previous evaluation, when five community development loans totaling \$4.8 million were made. Regarding the community development purpose, two loans supported affordable housing, one loan supported community services, and four loans supported revitalization or stabilization. Below are notable examples of the bank's community development loans originated during the evaluation period.

• A loan totaling \$3.2 million to construct a restaurant in a distressed area. This loan helps revitalize and stabilize the census tract by creating employment opportunities.

- Three PPP loans totaling \$4.9 million to businesses operating in a distressed or moderate-income census tracts. The loans provide assistance in maintaining business operations and retaining jobs, thereby promoting revitalization and stabilization.
- A loan totaling \$2.5 million to a non-profit organization that primarily serves low- and moderate-income individuals with community services. Funds were used to construct a new facility for the organization and expand operations.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the North Carolina Non MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

# **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the North Carolina Non MSA assessment area. The bank made or retained 36 donations totaling \$30,000, or 0.1 percent by dollar, of North Carolina's community development investments. This represents a significant increase in both number and dollar volume of qualified investments from the prior evaluation, when nine investments totaling \$5,000 were made in this assessment area. The majority of United Community Bank's donations targeted community services.

Below are examples of qualified donations that benefited the North Carolina Non MSA assessment area.

- In 2022 and 2023, the bank donated an aggregate of \$7,000 to a non-profit organization that provides essential services, including educational and health services, to low- and moderate-income individuals.
- In 2022, the bank donated \$2,000 to an organization that provides free medical care, counseling services, and food; a supplemental education; and temporary housing to those in need.
- In 2021, the bank donated \$5,000 to an organization that primarily serves low- and moderate-income individuals through financial education, counseling, and helping individuals reach housing and basic-needs goals.

#### SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank provides a relatively high level of community development services.

# **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. United Community Bank operates 17 branches in the North Carolina Non MSA assessment area, which represents 46.0 percent of the bank's branches in the state. As a result of the 2020 Census, the income classification of one branch located in a moderate-income census tract was reclassified to a distressed or underserved middle-income census tract in the North Carolina Non MSA assessment area. The bank operates one branch in a moderate-income census tract, which is significantly below the percent of population in those census tracts. However, several of the branches serve the majority of the moderate-income census tracts in the assessment area. In addition, nine branches that are located in middle-income census tracts are designated as distressed or underserved during the review period. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census Tracts		Population		Branches		<b>Open Branches</b>		<b>Closed Branches</b>	
	#	%	#	%	#	%	#	%	#	%
Low	-	_	-	-	-	-	-	-	-	-
Moderate	19	16.1	56,796	14.96	1	5.9	-	-	-	-
Middle	75	63.6	237,124	62.45	12	70.6	-	-	-	-
Upper	21	17.8	79,147	20.8	4	23.5	-	-	-	-
NA	3	2.5	6,655	1.75	-	-	-	-	-	-
Totals	118	100.0	379,722	100.0	17	100.0	-	-	-	-

# **Community Development Services**

United Community Bank provides a relatively high level of community development services in this assessment area. During the evaluation period, bank employees participated in 46 community development services totaling 219 hours. This performance represents 65.7 percent by number, which is above the assessment area's share of statewide branches at 46.0 percent. However, this performance represents 43.3 percent by hours of all activities in the state, which is slightly below the percent of branches. In addition, this performance reflects a significant increase since the previous evaluation when the bank performed 29 community development services in the North Carolina Non MSA, which reflects the bank's responsiveness to community needs in the assessment area. Community development services equate to 0.8 services and 4.0 hours per branch per year. The following are examples of community development services provided in the assessment area.

- From 2021 to 2023, several employees taught financial literacy courses to students at schools that are under the Community Eligibility Provision (CEP). CEP allows the nation's highest poverty schools and districts to serve breakfast and lunch at no cost to all students enrolled. The financial literacy courses covered topics such as saving and budgeting.
- In 2021 and 2022, an employee served on the Board and Finance Committee of a non-profit organization that provides support and resources to disadvantaged individuals in the community. The organization provides assistance with repairing and rehabilitating homes owned by low-income families and offers non-perishable food to those in need.
- In 2021, an employee served on the Board of a non-profit organization that helps provide funding for medical and dental needs, food, housing, and scholarships for low- and moderate-income individuals.

# RALEIGH MSA ASSESSMENT AREA – Full-Scope Review

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN RALEIGH MSA ASSESSMENT AREA

The Raleigh MSA assessment area consists of two counties from the Raleigh-Cary, NC MSA, in their entirety: Johnston and Wake. United Community Bank operates nine, or 24.3 percent, of its rated area branches in the Raleigh MSA assessment area. By dollar volume, the assessment area accounts for 34.6 percent of rated area loans and 25.3 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area increased due to county census tract changes reported in the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	14	23
Moderate	53	58
Middle	63	99
Upper	79	95
Income Not Assigned	3	8
Total	212	283
Source: 2015 ACS Data and 2020 U.S. Census Data	ı	

### **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census data and 2022 D&B data.

Demographic I	nformation	of the Rale	igh MSA Asse	ssment Area	1	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	283	8.1	20.5	35.0	33.6	2.8
Population by Geography	1,345,409	7.1	19.4	36.7	34.9	1.9
Housing Units by Geography	519,295	7.5	20.0	36.5	34.4	1.7
Owner-Occupied Units by Geography	315,090	4.3	18.2	37.4	38.7	1.3
Occupied Rental Units by Geography	166,794	12.8	22.8	35.3	26.8	2.2
Vacant Units by Geography	37,411	10.5	21.8	34.1	31.2	2.2
Businesses by Geography	204,804	6.1	17.1	35.4	40.2	1.2
Farms by Geography	4,407	6.0	18.9	40.2	33.1	1.7
Family Distribution by Income Level	322,649	21.3	16.6	20.8	41.4	0.0
Household Distribution by Income Level	481,884	22.7	16.7	18.0	42.6	0.0
Median Family Income MSA - 39580 Raleigh-Cary, North Carolina MSA	•	\$96,929	Median Hous	ing Value	•	\$289,838
			Median Gross	s Rent		\$1,180
			Families Belo	w Poverty L	evel	6.0%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 33.5 percent, followed by non-classifiable establishments at 30.2 percent and finance, insurance, and real estate at 10.9 percent. Top employers in the assessment area include Johnston County Public Schools, Duke University and Health Systems, Novo Nordisk Pharmaceutical, State of North Carolina, and Wake County Public Schools.

The unemployment rates for all counties decreased for all counties in 2021 and 2022. In addition, unemployment rates were generally lower than state and national averages during the evaluation period. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

Unemployment Rates									
	2020	2021	2022						
Area	%	%	%						
Johnston	6.3	4.3	3.3						
Wake	6.4	4.1	3.1						
State of North Carolina	7.3	4.9	3.6						
National Average	8.1	5.4	3.6						
Source: Bureau of Labor Statistics									

# **Competition**

The assessment area is competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 34 FDIC-insured financial institutions operating 272 offices in this assessment area. Of these institutions, United Community Bank ranked 10<sup>th</sup> with 1.1 percent deposit market share. The top five financial institutions accounted for 85.9 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 702 lenders reported 61,272 residential mortgage loans for \$21.8 billion in the assessment area. United Community Bank ranked 32<sup>nd</sup> with a market share of 0.6 percent by number of loans. The top five home mortgage lenders accounted for 32.1 percent of total market share by number of loans.

There is a moderate level of competition for small business loans. In 2021, 178 lenders reported 43,510 small business loans for \$1.8 billion. United Community Bank ranked 18<sup>th</sup> with a market share of 1.3 percent by number of loans. The top five small business lenders accounted for 52.8 percent of total market share by number of loans.

# **Community Contact**

Examiners used an existing community contact recently conducted with a non-profit organization that focused on advocating for growth policies that benefit existing and future residents and are climate friendly. The organization primarily targets support for communities experiencing displacement from housing cost, cost-burdened by lack of transportation options, and those most atrisk due to the changing economy and environment. The organization serves counties throughout the assessment area.

The contact stated that the assessment area experiences income extremes with large numbers of low-, moderate- and upper-income families. As interest rates continue to rise, housing costs have not declined. The demand for housing increased especially since the area was designated one of the best places to live. The contacted stated that, when considering high interest rates, increased demand for housing, and low median family incomes, affordable housing in the assessment area is harder to find. The contact further stated that based on rapid transit expansion in the area, small business credit needs have also increased. The contact stated that smaller and mid-sized financial institutions are working to meet the area credit needs; however, local financial institutions need to become more involved.

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

Considering information obtained from the community contact, demographic data, and economic data, examiners determined that affordable housing represents a primary credit and community development need and opportunity. This conclusion is supported from information obtained from the community contact, 37.9 percent of families are low- and moderate-income. In addition, small business loans are a credit need and opportunity within the assessment area. This conclusion is supported by the significant percentage of businesses with gross annual revenues of \$1.0 million or

less (91.9 percent) and the large number of businesses with four or fewer employees (58.9 percent). Further, revitalization and stabilization represents a need and opportunity, as 28.6 percent of census tracts are low- and moderate-income.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN RALEIGH MSA ASSESSMENT AREA

#### LENDING TEST

Lending levels in the Raleigh MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area, and the distribution of loans reflects good penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank has made a relatively high level of community development loans.

#### **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 1,660 home mortgage loans totaling \$530.6 million and 1,658 small business loans totaling \$185.3 million in the Raleigh MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

#### **Geographic Distribution**

The geographic distribution of loans reflects excellent penetration throughout the assessment area.

#### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area. Lending in low-income census tracts exceeded both demographic data and aggregate performance. Lending in moderate-income census tracts significantly exceeded both demographic data and aggregate performance.

#### Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. Lending in low-income census tracts was comparable to both demographic data and aggregate performance. In 2022, lending in low-income census tracts increased 12.1 percent to 15.8 percent and more than doubled demographic data. Lending in moderate-income census tracts almost doubled demographic data and aggregate performance. However, performance in 2022 declined 12.4 percent, but remained significantly above demographic data.

# **Borrower Profile**

The distribution of borrowers reflects good penetration among borrows of different income levels and business customers of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loans reflects good penetration among borrowers of different income levels. Lending to low-income borrowers was below demographic data, but exceeded aggregate performance. In 2020 and 2021, lending to moderate-income borrowers exceeded demographic data and aggregate performance. In 2022, lending to moderate-income borrowers was above demographic data and in line with aggregate performance.

#### Small Business Loans

The distribution of small business loans reflects good penetration among business customers of different sizes. Lending to small businesses was below demographic data, but comparable to aggregate performance. Given the level of competition within the assessment area, performance is considered good.

### **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Raleigh MSA assessment area. United Community Bank originated four community development loans totaling \$18.7 million. This amount represents 18.2 percent, by number, and 15.1 percent, by dollar volume, of total community development loans originated in North Carolina. Community development lending has significantly increased since the previous evaluation, when two community development loans totaling \$4.3 million were made. Regarding the community development purpose, one loan supported affordable housing, one loan supported community services, and two loans supported revitalization or stabilization. Below are examples of the bank's community development loans originated during the evaluation period.

- A loan totaling \$11.0 million to construct a warehouse in a moderate-income census tract. The loan provides revitalization and stabilization for the area and creates new jobs.
- A loan totaling \$5.0 million to a new medical facility located in a low-income census tract. The medical facility provides essential healthcare services to low- and moderate-income individuals.
- A loan totaling \$2.2 million to construct a retail space in a low-income census tract. The retail space will contain five new businesses. The surrounding census tracts are predominately low- or moderate-income. The retail space will provide revitalization and stabilization.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Raleigh MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

## **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Raleigh MSA assessment area. The bank made or retained 16 investments totaling \$96,000, or 0.4 percent by dollar, of North Carolina's community development investments. This includes approximately \$42,000 in grants or donations and approximately \$54,000 in a prior period investment. This represents a significant increase in number, but a significant decrease in dollar volume of qualified investments from the prior evaluation, when four investments totaling \$1.1 million were made in this assessment area. The prior period investment targeted revitalization and stabilization, while donations primarily targeted community services.

Below are examples of qualified investments that benefited the Raleigh MSA assessment area.

- The bank continues to hold \$54,000 in a prior period community development entity that invests in real estate projects in underserved areas. The bank's investment provided for the rehabilitation of a shopping center in a moderate-income area, which attracted new businesses and created jobs.
- From 2022 to 2023, the bank made three donations totaling \$30,000 to an organization that provides financial education and family support to low- and moderate-income individuals.
- From 2021 to 2023, the bank made four donations totaling \$2,000 to a non-profit organization that provides financial education services primarily to low- and moderate-income individuals.

#### SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank provides a limited level of community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are readily accessible to all portions of the assessment area. United Community Bank operates nine branches in the Raleigh MSA assessment area, which represents 24.3 percent of the bank's branches in the state. As a result of the 2020 Census, the income- classification of five branches changed in the Raleigh MSA assessment area. The net effect of the changes resulted in an increase of three branches in low-income census tracts and a decrease of four branches in moderate-

income census tracts. The branch distribution in low-income census tracts is significantly above the percent of population in those census tracts, while the percent of branches in moderate-income census tracts is below the percent of population in those census tracts. The distribution of ATMs is consistent with the branch distribution. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census	ensus Tracts   Populat		tion Branches			Open Branches		<b>Closed Branches</b>	
	#	%	#	%	#	%	#	%	#	%
Low	23	8.1	95,656	7.1	4	44.5	-	-	-	-
Moderate	58	20.5	261,266	19.4	1	11.1	-	-	-	-
Middle	99	35.0	493,157	36.7	2	22.2	-	-	2	100.0
Upper	95	33.6	470,170	34.9	1	11.1	-	-	-	-
NA	8	2.8	25,160	1.9	1	11.1	-	-	-	-
Totals	283	100.0	1,345,409	100.0	9	100.0	-	-	2	100.0

# **Community Development Services**

United Community Bank provided a limited level of community development services in this assessment area. During the evaluation period, bank employees participated in four community development services totaling 11 hours. This performance represents 5.7 percent by number and 2.2 percent by hours of all activities in the state, which is significantly below the assessment area's share of statewide branches at 24.3 percent. In addition, this performance reflects a significant decrease since the previous evaluation when the bank performed 22 community development services in the Raleigh MSA. Community development services equate to 0.1 services and 0.4 hours per branch per year. The following are examples of community development services provided in the assessment area.

- In 2023, several employees taught a financial literacy course covering financial management to students from low- and moderate-income families who attend elementary schools that are under the CEP.
- In 2020, a bank employee served on the Board of a nonprofit organization that provides community services through quality educational programs, college and career readiness, family support, and health and wellness for students attending two schools where 100.0 percent of the students qualify for free or reduced lunch.

# 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 four 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
Asheville MSA	Below	Consistent	Consistent
Charlotte MSA	Consistent	Below	Below
Fayetteville MSA	Below	Below	Below
Wilmington MSA	Below	Below	Below

The following facts and data support the conclusions for each limited-scope assessment area. Also included are details regarding the number and dollar volume of home mortgage, small business, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Additional information is in the Limited-Scope Assessment Area Appendices.

#### Asheville MSA Assessment Area

The Asheville MSA assessment area consists of Buncombe, Haywood, and Henderson counties, which are part of the Asheville, NC MSA. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	1,283	348,489
Small Business Loans	539	64,347
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	34	29
CD Services	12	252 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/20.	20 to 9/30/2023	

### Geographic Distribution and Borrower Profile

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

#### **Charlotte MSA Assessment Area**

The Charlotte MSA assessment area consists of Iredell and Mecklenburg counties, which are part of the Charlotte-Concord-Gastonia, NC-SC MSA. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	181	61,818
Small Business Loans	152	26,666
Community Development Loans	5	43,399
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	7	16
CD Services	7	15 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

## Geographic Distribution and Borrower Profile

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

# **Fayetteville MSA Assessment Area**

The Fayetteville MSA assessment area consisted of Harnett County, which is part of the Fayetteville, NC MSA. This assessment area consisted of one branch, which closed as of April 1, 2022; therefore, removing the assessment area from the bank-wide assessment area, as of the branch closure date. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	68	12,623
Small Business Loans	128	10,810
Community Development Loans	1	1,707
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	1	1
CD Services	-	-
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

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

# Wilmington MSA Assessment Area

The Wilmington MSA assessment area consists of New Hanover County, one of the two counties in the Wilmington, North Carolina MSA. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	15	4,811
Small Business Loans	14	2,805
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	-	-
CD Services	-	-
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

#### Geographic Distribution and Borrower Profile

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

### **SOUTH CAROLINA**

# CRA RATING FOR SOUTH CAROLINA: <u>SATISFACTORY</u>

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

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA

United Community Bank has designated seven assessment areas within the State of South Carolina. The Columbia MSA assessment area was added as a result of two branch openings in December 2020. In addition, Abbeville and Oconee counties were removed from the South Carolina Non MSA assessment area in January 2020. The bank operates 35, or 19.2 percent, of its total branch offices in South Carolina. South Carolina accounts for 18.9 percent of bank-wide loans and 16.1 percent of the bank-wide deposits. Overall, United Community Bank ranks 7<sup>th</sup> in the state in deposit market share at 3.5 percent. Competitor institutions in the South Carolina assessment areas include Bank of America, National Association; Wells Fargo Bank, National Association; Truist Bank; SouthState Bank, National Association; and First-Citizens Bank & Trust Company.

### SCOPE OF EVALUATION – SOUTH CAROLINA

The evaluation of the South Carolina performance considered the operations of United Community Bank in seven assessment areas, which are detailed in the Description of Assessment Areas. 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 Greenville MSA and Charleston MSA assessment areas. Limited scope areas included the Columbia MSA, Hilton Head MSA, Myrtle Beach MSA, Spartanburg MSA, and South Carolina Non MSA assessment areas. During the review period, home mortgage loans were given more weight than small business loans when considering the number and dollar volume of these products in six assessment areas. Small

business lending was given more weight than home mortgage lending when considering the number of dollar volume of these products for the Myrtle Beach MSA assessment area. Refer to the following table for the distribution of lending, deposits, and branches in each assessment area.

A A	Loan	S	Depos	Branches		
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Charleston MSA	596,143	30.0	257,458	7.4	5	14.3
Columbia MSA	89,336	4.5	49,811	1.4	2	5.7
Greenville MSA	721,562	36.3	2,063,678	59.5	14	40.0
Hilton Head MSA	125,177	6.3	42,495	1.2	1	2.9
Myrtle Beach MSA	208,686	10.5	476,713	13.8	6	17.1
South Carolina Non MSA	53,924	2.7	247,562	7.2	3	8.6
Spartanburg MSA	192,623	9.7	328,883	9.5	4	11.4
Total	1,987,451	100.0	3,466,600	100.0	35	100

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN SOUTH CAROLINA

#### LENDING TEST

The Lending Test rating is High Satisfactory. Lending levels in South Carolina reflect good responsiveness to the assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans. The bank's performance in the Charleston MSA, Greenville MSA, Myrtle Beach MSA, and Spartanburg MSA assessment areas is consistent with this conclusion. Performance in the Columbia MSA, Hilton Head MSA and South Carolina Non MSA assessment areas was below the performance conclusion.

#### **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. Refer to each South Carolina assessment area for details.

#### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the South Carolina assessment areas. Performance in all seven assessment areas is consistent with the rated area performance.

# **Borrower Profile**

The distribution of borrowers reflect adequate penetration throughout the South Carolina assessment areas. Performance in five assessment areas is consistent with the rated area performance. Performance in the Myrtle Beach MSA assessment area is above the rated area performance, while the Columbia MSA assessment area is below the rated area performance.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in South Carolina. During this evaluation period, the bank originated 24 community development loans totaling \$75.1 million. This performance represents 20.0 percent, by number, and 17.3 percent, by dollar volume, of total bank-wide community development loans. Community development lending has increased since the previous evaluation, when 14 community development loans totaling \$37.6 million were made. Additionally, seven loans totaling \$21.8 million were originated outside of the assessment areas but in a broader statewide area that includes the assessment areas. Since the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader state-wide lending. The bank's performance in the Charleston MSA, Columbia MSA, Greenville MSA, and Spartanburg MSA assessment areas is consistent with this conclusion. Performance in the Hilton Head MSA, Myrtle Beach MSA, and South Carolina Non MSA assessment areas was below the performance conclusion. The following table illustrates the community development loans by assessment area and purpose.

Assessment Area	Affordable Community Housing Services		Economic Development			vitalize or tabilize	Totals			
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Charleston MSA	2	5,090	1	2,224	1	1,101	1	6,528	5	14,943
Columbia MSA	-	-	-	-	-	-	3	8,901	3	8,901
Greenville MSA	-	-	1	6,485	-	-	2	11,062	3	17,547
Hilton Head MSA	-	-	-	-	-	-	-	-	-	-
Myrtle Beach MSA	-	-	-	-	1	1,419	-	-	1	1,419
South Carolina Non MSA	1	350	-	-	-	-	-	-	1	350
Spartanburg MSA	1	500	1	6,500	-	-	2	3,146	4	10,146
State-wide Activities	2	1,292	-	-	1	2,482	4	18,067	7	21,841
Total	6	7,232	3	15,209	3	5,002	12	47,704	24	75,147

The analysis for each full-scope South Carolina assessment area includes a detailed discussion of community development loans. Below are examples of the bank's state-wide activities in South Carolina.

• A loan totaling \$9.9 million to construct a warehouse facility in a low-income census tract.

The surrounding census tracts are predominately distressed due to poverty levels. The loan is part of a New Market Tax Credit, which incentivizes community development and economic growth and attracts private investment to distressed communities which revitalizes and stabilizes the area.

- A loan totaling \$868,500 to finance an apartment complex that provides affordable housing. Tenants at the complex qualify for the USDA Rural Development Housing Voucher Program, a rental subsidy program.
- A loan totaling \$1.3 million to build a store that offers affordable shopping in a distressed middle-income income census tract that will revitalize and stabilize the area by creating employment opportunities.

#### INVESTMENT TEST

The Investment Test performance is High Satisfactory. The bank has a significant level of qualified investments in South Carolina. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. Performance was generally consistent among the assessment areas.

### **Investment and Grant Activity**

United Community Bank has a significant level of qualified investments in South Carolina. The bank made or maintained 119 investments totaling \$32.4 million throughout the state, representing 9.8 percent of total bank-wide qualified community development investments by dollar volume. This represents a significant increase in number but a decrease in dollar volume since the previous evaluation, when 44 qualified investments totaling \$41.9 million were made in the state. Included in state-wide activities are nine prior period qualified investments totaling \$14.2 million that benefited the broader state-wide area in South Carolina that includes the assessment areas. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment areas. Further, eight bank-wide qualified investments targeted South Carolina, as noted in the bank-wide Investment Test analysis. A majority of donations targeted community services. The following table details the bank's qualified investments, grants, and donations by community development purpose.

	Quali	fied Investn	nents b	y Rated Ar	ea – S	outh Carol	ina			
Assessment Area					eonomic elopment		vitalize or tabilize	7	Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Charleston MSA	1	1	6	9	-	-	-	-	7	10
Columbia MSA	1	7	8	33	2	1,000	-	-	11	1,040
Greenville MSA	12	3,748	52	78	8	5,011	1	1	73	8,838
Hilton Head MSA	-	-	_	-	-	-	-	-	-	-
Myrtle Beach MSA	1	3	7	10	-	-	-	-	8	13
South Carolina Non MSA	1	1	3	1	-	-	-	-	4	2
Spartanburg MSA	2	8,267	4	6	-	-	1	10	7	8,283
State-wide Activities	9	14,172	-	-	-	-	-	-	9	14,172
Total	27	26,199	80	137	10	6,011	2	11	119	32,358
Source: Bank Records	•	•	•	•	•		•			

Below are examples of the bank's qualified investments that impacted multiple assessment areas within the state or that benefited the broader state-wide area in South Carolina.

- The bank continues to hold \$8.2 million in a prior period MBS comprised of loans secured by multi-family properties where the majority of units are designated for low- and moderate-income individuals. This investment provides affordable housing in the Greenville MSA and Spartanburg MSA assessment areas.
- The bank continues to hold \$4.1 million in a prior period LIHTC fund that provides affordable housing for low- and moderate-income individuals that benefitted the Charleston MSA and Spartanburg MSA assessment areas.
- The bank continues to hold \$772,161 in a prior period MBS secured by loans to low- and moderate-income borrowers. This investment provides affordable housing in the Charleston MSA, Greenville MSA, and Spartanburg MSA assessment areas.

#### SERVICE TEST

The Service Test rating for this institution is High Satisfactory in South Carolina. United Community Bank's delivery systems are accessible to essentially all portions of the institution's South Carolina 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 and/or to low and moderate-income individuals. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, and 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 institution's assessment areas. United Community Bank operates 35 branches in South Carolina, which represents 17.8 percent of bank-wide branches, and 4 remote ATMs. As a result of the 2020 Census, the net effect of the changes caused the number of branches in moderate-income census tracts to increase by one. Overall, the branch distribution in low-income census tracts more than doubled the percent of population in those respective census tracts. The branch distribution in moderate-income census tracts was 7.1 percent below the population in moderate-income census tracts. The distribution of ATMs is consistent with the branch distribution, with three additional remote ATMs located in moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level in South Carolina.

Tract Income Level	Census	Tracts	Population		Branches		Open Branches		<b>Closed Branches</b>	
	#	%	#	%	#	%	#	%	#	%
Low	46	5.5	144,651	4.2	3	8.6	1	25.0	-	-
Moderate	199	23.7	733,110	21.4	5	14.3	-	-	1	20.0
Middle	343	40.8	1,486,722	43.4	17	48.6	-	-	3	60.0
Upper	234	27.8	1,022,802	29.8	9	25.7	3	75.0	1	20.0
NA	19	2.2	42,394	1.2	1	2.8	-	-	-	-
Totals	841	100.0	3,429,679	100.0	35	100.0	4	100.0	5	100.0

#### **Changes in Branch Locations**

To the extent changes were made, United Community Bank's record of opening and closing branches has not adversely impacted the accessibility of its delivery systems, particularly in low-and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened four branches and closed five branches. Of the four branches opened, one was located in a low-income census tract. Of the five branches closed, one was located in a moderate-income census tract. The net effect in branches opened and closed resulted in an increase of one branch in the low-income census tract and a decrease of one branch in the moderate-income census tract.

# **Community Development Services**

United Community Bank is a leader in providing community development services in South Carolina. Bank employees provided 172 qualifying services totaling 510 hours throughout the South Carolina assessment areas. This performance represented 29.9 percent of the bank-wide community development services by number. In addition, this performance reflects a significant increase since the previous evaluation when the bank performed 35 community development services in South Carolina. Total community development services equate to 1.5 services and 4.5 hours per branch per year. The following tables detail the bank's community development services

activity by assessment area and purpose during the evaluation period.

Community Development	opmen	t Servic	es in S	outh Ca	rolina b	y Assess	ment A	rea		
Assessment Area	Affordal essment Area Housin					nomic opment		talize abilize	To	otals
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Charleston MSA	8	17	7	19	-	-	-	-	15	36
Columbia MSA	4	13	5	36	-	-	-	-	9	49
Greenville MSA	8	12	70	128	4	50	-	-	82	190
Hilton Head MSA	-	-	1	1	-	-	-	-	1	1
Myrtle Beach MSA	1	44	6	51	-	-	-	-	7	95
South Carolina Non MSA	-	-	8	30	-	-	-	-	8	30
Spartanburg MSA	-	-	50	109	-	-	-	-	50	109
Totals	21	86	147	374	4	50	-	-	172	510
Source: July 1, 2020 through September 30, 20.	23 Bank	Records		•		•				

# **GREENVILLE MSA ASSESSMENT AREA – Full-Scope Review**

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN GREENVILLE MSA ASSESSMENT AREA

The Greenville MSA assessment area consists of four counties in their entirety: Anderson, Greenville, Laurens, and Pickens counties, which are a part of the Greenville-Anderson, SC MSA. United Community Bank operates 14, or 40.0 percent, of its rated area branches in the Greenville MSA assessment area. By dollar volume, the assessment area accounts for 36.3 percent of rated area loans and 59.5 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area changed due to the county changes resulting from the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	15	13
Moderate	53	62
Middle	79	94
Upper	48	60
Income Not Assigned	-	2
Total	195	231
Source: 2015 ACS Data and 2020 U.S. Census Data		

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

The following table presents select demographic information from the 2015 ACS data and 2022 D&B data.

Demographic Inform	Demographic Information of the Greenville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	231	5.6	26.8	40.7	26.0	0.9	
Population by Geography	928,195	4.2	22.3	41.2	31.8	0.6	
Housing Units by Geography	390,288	4.5	24.0	41.2	29.6	0.7	
Owner-Occupied Units by Geography	243,770	2.9	20.0	43.1	33.7	0.4	
Occupied Rental Units by Geography	106,958	7.7	30.6	37.1	23.1	1.4	
Vacant Units by Geography	39,560	5.4	30.8	40.5	22.4	1.1	
Businesses by Geography	107,362	4.0	18.9	36.3	39.7	1.1	
Farms by Geography	2,798	2.8	21.9	45.1	29.3	0.8	
Family Distribution by Income Level	234,435	20.9	18.0	20.2	40.9	0.0	
Household Distribution by Income Level	350,728	23.8	16.5	17.6	42.1	0.0	
Median Family Income MSA - Greenville- Anderson, SC MSA		\$71,958	Median Hou	sing Value		\$183,639	
			Median Gros	ss Rent		\$906	
			Families Bel	ow Poverty I	Level	8.8%	

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 30.9 percent, followed by non-classifiable establishments at 30.0 percent, and finance, insurance, and real estate at 11.1 percent. Top employers include Prisma Health, Michelin North America, Clemson University, Milliken & Company, and Bon Secours St. Francis Health System.

have not been assigned an income classification.

The unemployment rates for all counties decreased in 2021 and 2022. In addition, unemployment rates were generally in line with the state, but lower than the national averages. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

	Unemployme	nt Rates	
	2020	2021	2022
Area	%	%	%
Anderson	5.8	3.7	3.0
Greenville	5.5	3.4	2.8
Laurens	6.7	4.3	3.4
Pickens	5.2	3.5	3.1
State of South Carolina	6.0	4.0	3.3
National Average	8.1	5.4	3.6
Source: Bureau of Labor Statistics			

# **Competition**

The assessment area is competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 39 FDIC-insured financial institutions operating 233 offices in this assessment area. Of these institutions, United Community Bank ranked 5<sup>th</sup> with a 7.9 percent deposit market share. The top four financial institutions accounted for 48.7 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 594 lenders reported 32,173 residential mortgage loans for \$9.0 billion in the assessment area. United Community Bank ranked 15<sup>th</sup> with a market share of 1.6 percent by number of loans. The top five home mortgage lenders accounted for 19.9 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 153 lenders reported 22,414 small business loans for \$1.0 million. United Community Bank ranked 12<sup>th</sup> with a market share of 2.9 percent by number of loans. The top five small business lenders accounted for 48.3 percent of total market share by number of loans.

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

Considering information obtained from demographic data and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area, as 38.9 percent of the families are low- and moderate-income. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (90.6 percent) and the large number of businesses with four or fewer employees (57.3 percent) support the conclusion that there is a need for small business lending. The presence of low- and moderate-income census tracts in the assessment area indicates there is a need and opportunity for assistance in revitalizing and stabilizing these census tracts.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN GREENVILLE MSA ASSESSMENT AREA

#### LENDING TEST

Lending levels in the Greenville MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank has made a relatively high level of community development loans.

# **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 1,970 home mortgage loans totaling \$451.4 million and 2,029 small business loans totaling \$270.1 million in the Greenville MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the assessment area.

#### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below demographic data and aggregate performance. However, demographic data indicates there is limited lending opportunity in low-income geographies. Lending in moderate-income census tracts was below demographic data, but comparable to aggregate performance. Given the level of competition within the assessment area, performance is considered adequate.

#### Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was slightly below demographic data and in line with aggregate performance. Lending in moderate-income census tracts was below demographic data and comparable to aggregate performance. Further, United Community Bank ranked 8<sup>th</sup> and 12<sup>th</sup> among peers in lending in low- and moderate-income census tracts, respectively.

#### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among borrows of different income levels and business customers of different sizes.

#### Home Mortgage Loans

The distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. Lending to low-income borrowers was below demographic data, but comparable to aggregate performance. In 2021, lending to moderate-income borrowers was below aggregate performance and demographic data. However, in 2022, lending to moderate-income borrows increased by 3.7 percent and was comparable to demographic data and aggregate performance.

#### Small Business Loans

The distribution of small business loans reflects adequate penetration among business customers of different sizes. Lending was below demographic data and aggregate performance. However, in 2022, performance increased 8.0 percent, but remained significantly below demographics. Given the level of competition and loan demand, performance is considered adequate.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Greenville MSA assessment area. United Community Bank originated three community development loans totaling \$17.5 million. This amount represents 12.5 percent, by number, and 23.4 percent, by dollar volume, of total community development loans originated in South Carolina. Community development lending remained consistent since the previous evaluation, when six community development loans totaling \$17.2 million were made. Regarding the community development purpose, one loan supported community services and two loans supported revitalization or stabilization. Below are the bank's community development loans originated during the evaluation period.

- A loan totaling \$10.0 million to construct a retail center in a low-income census tract. The loan helps revitalize and stabilize by attracting businesses and residents.
- A loan totaling \$6.5 million to a school board, where all of the schools have 100 percent of students who qualify for reduced or free reduced lunch, for building improvements and services that primarily serve low- and moderate-income individuals.
- A PPP loan totaling \$1.1 million to a business to maintain operations and retain jobs of lowand moderate-income individuals that are primarily employed, promoting economic development.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Greenville MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

# **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Greenville MSA assessment area. The bank made 73 investments totaling \$8.8 million, or 27.3 percent by dollar, of South Carolina's community development investments. This includes two investments for approximately \$8.7 million and 71 grants or donations for approximately \$138,000. This represents an increase in both number and dollar volume of qualified investments from the prior evaluation, when 26 investments totaling \$7.3 million were made in this assessment area. United Community Bank's investments targeted affordable housing and economic development, which are identified community development needs for the assessment areas. A majority of grants and donations targeted community services.

Below are examples of qualified investments that benefited the Greenville MSA assessment area.

- In 2023, the bank invested \$5.0 million in a Rural Business Investment Company (RBIC) that provides capital needs to rural communities to create job opportunities, with an emphasis on small entities, thereby, promoting economic development.
- In 2021, the bank invested \$3.7 million in a bond for the construction, improvement, and maintenance of a 180-unit apartment complex designated for low- and moderate-income individuals, thereby, providing affordable housing.
- From 2022 to 2023, the bank made three donations totaling \$25,000 to a non-profit organization that builds homes and provides affordable housing for low- and moderate-income individuals.

#### **SERVICE TEST**

Delivery systems are accessible to essentially all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. 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. United Community Bank operates 14 branches in the Greenville MSA assessment area, which represents 40.0 percent of the bank's branches in the state. As a result of the 2020 Census, the number of branches in moderate-income census tracts increased by one. The branch distribution in low-income census tracts is above the percent of population in those census tracts, and the percent of branches in moderate-income census tracts is consistent with the percent of population in those census tracts. Further, branches in middle- and upper-income census tracts serve approximately 11 low-income and 18 moderate-income census tracts. The distribution of ATMs is consistent with the branch distribution, with one additional remote ATM located in a moderate-income census tract. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census	Tracts	Population		Branches		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%
Low	13	5.6	38,599	4.2	1	7.2	-	-	-	-
Moderate	62	26.8	206,710	22.3	3	21.4	-	-	-	-
Middle	94	40.7	382,387	41.2	6	42.8	-	-	1	50.0
Upper	60	26.0	295,229	31.8	3	21.4	-	-	1	50.0
NA	2	0.9	5,270	0.5	1	7.2	-	-	-	-
Totals	231	100.0	928,195	100.0	14	100.0	-	-	2	100.0

#### **Changes in Branch Locations**

To the extent of the changes made, United Community Bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank did not open any branches in the Greenville MSA assessment area. Two branches were closed in the Greenville MSA assessment area; none of the branches were located in a low- or moderate-income census tract.

#### **Community Development Services**

United Community Bank 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 82 community development services totaling 190 hours. This performance represents 47.7 percent by number and 37.3 percent by hours of all activities in the state, which is consistent with the assessment area's share of statewide branches at 40.0 percent. In addition, this performance reflects a significant increase since the previous evaluation when the bank performed 12 community development services in the Greenville MSA which reflects the bank's responsiveness to community needs in the assessment area. Community development services

equate to 1.8 services and 4.2 hours per branch per year. The following are examples of community development services provided in the assessment area.

- In 2022 and 2023, several bank employees facilitated budgeting counseling in collaboration with a non-profit organization that provides affordable housing to low- and moderate-income homebuyers.
- In 2021 and 2022, a bank employee served on the Board of a non-profit organization that provides assistance in health, education, financial stability, and emergency relief to low- and moderate-income individuals.
- From 2021 to 2023, several bank employees taught financial literacy courses on financial management and budgeting at several schools where the majority of students receives free or reduced lunch.

# CHARLESTON MSA ASSESSMENT AREA – Full-Scope Review

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHARLESTON MSA ASSESSMENT AREA

The Charleston MSA assessment area consists of three counties in their entirety: Berkeley, Charleston, and Dorchester, which is the entire Charleston-North Charleston, SC MSA. United Community Bank operates five, or 14.3 percent, of its branches in the Charleston MSA assessment area. By dollar volume, the assessment area accounts for 30.0 percent of rated area loans and 7.4 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area changed due to county changes resulting from the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	14	13
Moderate	35	48
Middle	59	56
Upper	44	56
Income Not Assigned	4	5
Total	156	178
Source: 2015 ACS Data and 2020 U.S. Census Data		

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

The following table presents select demographic information from the 2015 ACS data and 2022 D&B data.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	7.3	27.0	31.5	31.5	2.3
Population by Geography	799,636	6.0	25.0	33.8	34.3	0.9
Housing Units by Geography	339,240	6.4	26.0	31.8	34.3	1
Owner-Occupied Units by Geography	200,413	4.6	22.8	33.6	38.4	0.
Occupied Rental Units by Geography	99,534	9.4	33.9	31.4	23.9	1.
Vacant Units by Geography	39,293	8.4	22.9	23.5	39.2	6.
Businesses by Geography	127,593	7.0	19.6	27.7	44.5	1.:
Farms by Geography	2,668	6.1	22.2	33.0	38.2	0
Family Distribution by Income Level	189,753	22.1	17.2	20.1	40.6	0.
Household Distribution by Income Level	299,947	24.0	16.1	17.9	42.0	0.0
Median Family Income MSA - Charleston-North Charleston, SC MSA		\$82,122	Median Hous	sing Value		\$313,55
	•		Median Gros	s Rent		\$1,23
			Families Bel	ow Poverty L	evel	8.29

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the non-classifiable establishments industry represents the largest percentage of businesses at 34.9 percent, followed by services at 29.4 percent, and finance, insurance, and real estate at 9.7 percent. Top employers include the Joint Base Charleston; Medical University of South Carolina; Roper St. Francis Healthcare; The Boeing Company; and Trident Health System.

The unemployment rates for all counties decreased in 2021 and 2022. In addition, unemployment rates were generally in line with the state, but lower than the national averages during the evaluation period. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

	Unemployme	nt Rates	
	2020	2021	2022
Area	%	%	%
Berkeley	5.4	3.6	3.1
Charleston	6.2	3.6	2.8
Dorchester	5.7	3.6	2.9
State of South Carolina	6.0	4.0	3.3
National Average	8.1	5.4	3.6
Source: Bureau of Labor Statistics		•	

# **Competition**

The assessment area is competitive in the financial services market. According to the FDIC's June 30, 2022 Deposit Market Share Report, there are 35 FDIC-insured financial institutions operating 187 offices in this assessment area. Of these institutions, United Community Bank ranked 16<sup>th</sup> with a 1.2 percent deposit market share. The top five financial institutions accounted for 62.1 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 693 lenders reported 37,711 residential mortgage loans for \$14.3 billion in the assessment area. United Community Bank ranked 44<sup>th</sup> with a market share of 0.6 percent by number of loans. The top five home mortgage lenders accounted for 16.4 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 161 lenders reported 25,505 small business loans for approximately \$1.2 million. United Community Bank ranked 20<sup>th</sup> with a market share of 1.1 percent by number of loans. The top five small business lenders accounted for 50.8 percent of total market share by number of loans.

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

Considering information obtained from demographic data and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area, as 39.3 percent of the families are low- and moderate-income. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (92.8 percent) and the large number of businesses with four or fewer employees (54.8 percent) support the conclusion that there is a need for small business lending.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN CHARLESTON MSA ASSESSMENT AREA

#### LENDING TEST

Lending levels in the Charleston MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank has made a relatively high level of community development loans.

# **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 866 home mortgage loans totaling \$443.0 million and 799 small business loans totaling \$153.1 million in the Charleston MSA

assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the assessment area.

# Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below demographic data, but comparable to aggregate performance. In 2021, the bank's performance in moderate-income census tracts was below demographic data, but comparable to aggregate data. In 2022, lending in moderate-income census tracts was below demographic data and aggregate performance. Given the level of competition in the assessment area and the limited home mortgage lending opportunities, performance is considered adequate.

#### Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was comparable to demographic data and aggregate performance. Lending in moderate-income census tracts was below demographic data and aggregate performance. In 2022, lending performance increased by 11.6 percent and exceeded demographic data.

#### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among borrows of different income levels and business customers of different sizes.

#### Home Mortgage Loans

The distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. Lending to low-income borrowers was significantly below demographic data, but comparable to aggregate performance. In 2021, lending to moderate-income borrowers was in line with demographic data and aggregate performance. In 2022, lending to moderate-income borrowers declined 2.5 percent and was below demographic data and aggregate performance. Given the level of competition within this assessment area, performance is considered adequate.

# Small Business Loans

The distribution of small business loans reflects adequate penetration among business customers of different sizes. Lending was below demographic data, but exceeded aggregate performance. In 2022, performance decreased by 2.8 percent and remained significantly below demographics. Given the level of competition within the assessment area, performance is considered adequate.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Charleston MSA assessment area. United Community Bank originated five community development loans totaling \$14.9 million. This amount represents 20.8 percent, by number, and 19.9 percent, by dollar volume, of total community development loans originated in South Carolina. Community development lending increased since the previous evaluation, when three community development loans totaling \$7.1 million were made. Regarding the community development purpose, two loans supported affordable housing, one loan supported community services, one loan supported economic development, and one loan supported revitalization or stabilization. Below are examples of the bank's community development loans originated during the evaluation period.

- A loan totaling \$6.5 million to redevelop a moderate-income area within a Tax Increment Financing (TIF) district, as part of a larger, comprehensive City plan. Plan goals are to improve infrastructure and attract businesses and residents, thereby revitalizing and stabilizing the area.
- A loan totaling \$3.4 million to construct a townhome community with all units being deed restricted with income limits to provide affordable housing for low- and moderate-income individuals.
- A loan totaling \$2.2 million to expand operating services of a non-profit organization. The organization provides essential community services, such as food, clothing, medical care, sheltering, job training, and financial assistance to those in need.

#### **INVESTMENT TEST**

The bank has a significant level of qualified community development investments and grants in the Charleston MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

#### **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Charleston MSA assessment area. The bank made seven donations totaling \$10,000, or 0.03 percent by dollar, of South Carolina's community development investments. This represents an increase in number but a significant decrease in dollar volume of qualified investments from the prior evaluation, when three investments totaling approximately \$6.5 million were made in this assessment area: one investment of approximately \$6.5 million and two donations or grants of approximately \$4,000. As noted in the statewide Investment Test analysis for South Carolina, this assessment area benefitted from investments made in the broader state-wide area. The majority of United Community Bank's grants and donations targeted community services.

Below are examples of qualified donations that benefited the Charleston MSA assessment area.

- In 2023, the bank donated \$1,250 to a non-profit organization that builds and provides affordable housing for low- and moderate-income individuals.
- In 2022, the bank made two donations totaling \$2,750 to an organization that targets lowand moderate-income individuals and underserved communities through education and job training, housing, and meeting essential health needs.
- From 2021 to 2022, the bank made two donations totaling \$2,500 to an organization that provides community services to those in need, such as housing, medical, legal, and food services, as well as job training.

#### SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area, and the opening and closing of branches improved the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank provided a relatively high level of community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the assessment area. United Community Bank operates five branches in the Charleston MSA assessment area, which represents 14.3 percent of the bank's branches in the state. As a result of the 2020 Census, the number of branches in moderate-income census tracts decreased by one. The bank operates one branch in the low-income census tract, which is triple the percentage of population. No branches are located in the moderate-income census tracts. However, branches in middle- and upper-income census tracts serve approximately two low-income and six moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census	Tracts	Population		Branches		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%
Low	13	7.3	48,003	6.0	1	20.0	1	50.0	-	-
Moderate	48	27.0	199,660	25.0	-	-	-	-	-	_
Middle	56	31.5	270,413	33.8	2	40.0	-	-	-	-
Upper	56	31.5	274,545	34.3	2	40.0	1	50.0	-	-
NA	5	2.8	7,015	0.9	-	_	_	-	-	-
Totals	178	100.0	799,636	100.0	5	100.0	2	100.0	-	-

# **Changes in Branch Locations**

To the extent of the changes made, United Community Bank's record of opening and closing branches improved the accessibility of its delivery systems, particularly in low- or moderate-income

geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened two branches in the Charleston MSA assessment area. One branch is located in a low-income census tract and one is in an upper-income census tract. The branch opened in the upper-income census tract serves one low-income census tract. There were no branch closures in the Charleston MSA assessment area during the review period.

# **Community Development Services**

United Community Bank provided a relatively high level of community development services in this assessment area. During the evaluation period, bank employees participated in 15 community development services totaling 32.5 hours. This performance represents 8.7 percent by number and 7.1 percent by hours of all activities in the state, which is below the assessment area's share of statewide branches at 14.3 percent. However, this performance reflects an increase since the previous evaluation when the bank performed six community development services in the Charleston MSA which reflects the bank's responsiveness to community needs in the assessment area. Community development services equate to 0.9 services and 2.2 hours per branch per year. The following are examples of community development services provided in the assessment area.

- In 2020, a bank employee facilitated multiple financial education sessions with realtors discussing financial concerns and qualifications of the bank's PATH homeownership loan program for low- and moderate-income homebuyers.
- In 2023, a bank employee taught several financial literacy courses on how to establish credit at a high school where the majority of the students receives free or reduced lunch.
- In 2023, a bank employee served on the Board of a non-profit organization located in a moderate-income census tract that provides services and therapy to children and families that suffer from child abuse and traumatic events.

# OTHER SOUTH CAROLINA 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	<b>Lending Test</b>	Investment Test	Service Test
Columbia MSA	Below	Consistent	Below
Hilton Head MSA	Below	Below	Below
Myrtle Beach MSA	Consistent	Below	Below
South Carolina Non MSA	Below	Below	Consistent
Spartanburg MSA	Consistent	Consistent	Consistent

The following facts and data support the conclusions for each limited-scope assessment area. Also included are details regarding the number and dollar volume of home mortgage, small business, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Additional information is in the Limited-Scope Assessment Area Appendices.

#### Columbia MSA Assessment Area

The Columbia MSA assessment area consists of Lexington and Richland counties, which are part of the Columbia, SC MSA. United Community Bank operates two branches in the Columbia assessment area. The assessment area was created in December 2020 due to the opening of a branch office in each Lexington and Richland counties. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	160	54,349
Small Business Loans	141	34,987
Community Development Loans	3	8,901
Investments (New)	2	1,000
Investments (Prior Period)	-	-
Donations	9	40
CD Services	9	49 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/202	0 to 9/30/2023	

#### Geographic Distribution and Borrower Profile

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

#### Hilton Head MSA Assessment Area

The Hilton Head MSA assessment area consists of Beaufort County, which is part of the Hilton Head Island-Bluffton, SC MSA. United Community Bank operates one branch office in the Hilton Head assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	279	107,442
Small Business Loans	132	17,735
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	-	-
CD Services	1	1 hour
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

Tables containing lending data for the Hilton Head MSA assessment area are in the Appendix.

#### Myrtle Beach MSA Assessment Area

The Myrtle Beach MSA assessment area consists of Horry County, which is the entire Myrtle Beach-Conway-North Myrtle Beach, SC MSA. United Community Bank operates six branches in the Myrtle Beach assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	524	96,901
Small Business Loans	797	111,785
Community Development Loans	1	1,419
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	8	13
CD Services	7	95 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020	0 to 9/30/2023	

#### Geographic Distribution and Borrower Profile

Tables containing lending data for the Myrtle Beach MSA assessment area are in the Appendix.

## South Carolina Non MSA Assessment Area

The South Carolina Non MSA assessment area consists of Cherokee and Greenwood counties. United Community Bank operates three of its branches in the South Carolina Non MSA assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	205	28,982
Small Business Loans	304	24,942
Community Development Loans	1	350
Investments (New)	-	-
Investments (Prior Period)	=	-
Donations	4	2
CD Services	8	30 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/202	3	

# Geographic Distribution and Borrower Profile

Tables containing lending data for the South Carolina Non MSA assessment area are in the Appendix.

# **Spartanburg MSA Assessment Area**

The Spartanburg assessment area consists of Spartanburg County, which comprises the Spartanburg, SC MSA. United Community Bank operates four branches in the Spartanburg, South Carolina assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	622	104,776
Small Business Loans	648	87,847
Community Development Loans	4	10,146
Investments (New)	-	-
Investments (Prior Period)	1	8,262
Donations	6	21
CD Services	50	109 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

Tables containing lending data for the Spartanburg assessment area are in the Appendix.

#### **TENNESSEE**

CRA RATING FOR TENNESSEE: <u>SATISFACTORY</u>

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

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

United Community Bank has designated six assessment areas within the State of Tennessee. United Community Bank acquired Reliant Bank in January 2022, which added the new assessment areas of the Chattanooga MSA, Clarkesville MSA, and Nashville MSA. The Tennessee Non MSA was removed when the bank closed its branches in Monroe and McMinn counties in December 2020. In addition, the bank acquired two branches in Hickman County, which is a non MSA county, which added back the Tennessee Non MSA assessment area. United Community Bank subsequently sold its acquired branches in Hickman County in August 2023, resulting in the removal of the assessment area.

United Community Bank operates 27, or 14.9 percent, of its total branch offices in Tennessee. Tennessee accounts for 6.3 percent of bank-wide loans and 11.2 percent of bank-wide deposits. Overall, United Community Bank ranks 9<sup>th</sup> in the state in deposit market share at 1.9 percent. Competitor institutions in the Tennessee assessment areas include Pinnacle Bank; Bank of America, N.A; Regions Bank; and Truist Bank.

#### SCOPE OF EVALUATION – TENNESSEE

The evaluation of the Tennessee performance considered the operations of United Community Bank in six assessment areas, which are detailed in the *Description of Assessment Areas*. Based on the number of loans and branches as well as dollar volume of deposits, examiners conducted a full-scope review of the bank's performance in the Knoxville MSA assessment area. Limited-scope areas included the Chattanooga MSA, Clarkesville MSA, Cleveland MSA, Nashville MSA, and Tennessee Non MSA assessment areas. During the review period, home mortgage loans were given more weight than small business loans when considering the number and dollar volume of these products in five assessment areas. Small business loans were given more weight than home mortgage loans when considering the number and dollar volume of these products for the Cleveland MSA assessment area. Refer to the following table for the distribution of lending, deposits, and branches in each assessment area.

A	Loan	S	Depos	Branches		
Assessment Area	\$(000s)	%	\$(000s)	%	#	%
Chattanooga MSA	29,272	4.4	39,872	1.7	1	3.7
Clarkesville MSA	9,037	1.4	261,256	10.9	4	14.8
Cleveland MSA	155,939	23.5	64,325	2.7	1	3.7
Knoxville MSA	319,666	48.1	643,980	26.8	6	22.2
Nashville MSA	132,584	19.9	1,271,830	52.9	15	55.6
Tennessee Non MSA	17,954	2.7	120,330	5.0	0	0.0
Total	664,452	100.0	2,401,593	100.0	27	100.0

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE

#### LENDING TEST

The Lending Test rating is Low Satisfactory. Lending levels in Tennessee reflect good responsiveness to the assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a low level of community development loans. Performance in the Chattanooga MSA, Knoxville MSA, and Tennessee Non MSA assessment areas is consistent with the rated area performance. Performance in the Clarkesville MSA, Cleveland MSA, and Nashville MSA assessment areas is above the rated area performance.

# **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. Refer to each Tennessee assessment area for details.

#### **Geographic Distribution**

Overall, the geographic distribution of loans reflects adequate penetration throughout the Tennessee assessment areas. Performance in the Knoxville MSA, Chattanooga MSA, and the Tennessee Non MSA assessment areas is consistent with the rated area performance. Performance in the Clarkesville MSA, Cleveland MSA, and Nashville MSA assessment areas is above the rated area performance.

# **Borrower Profile**

Overall, the distribution of borrowers reflects adequate penetration among retail customers of different income levels and businesses of different sizes in Tennessee. Performance in four assessment areas is consistent with the rated area performance. Performance in the Clarkesville MSA and Cleveland MSA assessment area is above the rated area performance.

# **Community Development Loans**

United Community Bank has made a low level of community development loans in Tennessee. During this evaluation period, the bank originated two community development loans totaling \$14.7 million. This performance represents 1.7 percent, by number, and 3.4 percent, by dollar volume, of total bank-wide community development loans. Community development lending has decreased since the previous evaluation, when three community development loans totaling \$23.8 million were made. Performance in the Chattanooga MSA and Nashville MSA assessment areas is above the performance conclusion, while the performance for the Clarkesville MSA, Cleveland MSA, Knoxville MSA, and Tennessee Non MSA assessment areas was below the performance conclusion. The following table illustrates the community development loans by assessment area and purpose.

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Knoxville MSA	-	-	-	-	-	-	-	-	-	-
Chattanooga MSA	-	-	-	-	-	-	1	11,500	1	11,500
Clarkesville MSA	-	-	-	-	-	-	-	-	-	-
Cleveland MSA	-	-	-	-	-	-	-	-	1	-
Nashville MSA	1	3,200	-	-	-	-	-	-	1	3,200
Tennessee Non MSA	-	-	-	-	-	-	-	-	-	-
Total	1	3,200	-	-	-	_	1	11,500	2	14,700

#### **INVESTMENT TEST**

The Investment Test performance is High Satisfactory. The bank has a significant level of qualified investments in Tennessee. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. Performance was generally consistent among the assessment areas.

#### **Investment and Grant Activity**

United Community Bank has a significant level of qualified investments in Tennessee. The bank made or maintained 60 investments totaling \$21.7 million throughout the state, representing 6.6 percent of total bank-wide qualified community development investments by dollar volume. This represents an increase in both number and dollar volume since the previous evaluation, when 47 qualified investments totaling \$21.3 million were made in the state. Included in this number are three qualified investments totaling \$560,000 that benefited the broader state-wide area in Tennessee that includes the assessment areas.

Further, 11 bank-wide qualified investments targeted Tennessee, as noted in the bank-wide Investment Test analysis. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment areas. A majority of donations targeted community services. The following table details the bank's qualified investments, grants, and donations by community development purpose.

	Qu	alified Inves	stments	by Rated	Area -	- Tennessee	2				
Assessment Area	Affordable Housing			Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
Knoxville MSA	4	753	21	27	-	-	-	-	25	780	
Chattanooga MSA	1	13,275	1	1	-	-	-	-	2	13,276	
Clarkesville MSA	1	3,000	-	-	-	-	-	-	1	3,000	
Cleveland MSA	-	-	4	4	-	-	-	-	4	4	
Nashville MSA	1	8	21	54	2	4,002	-	-	24	4,064	
Tennessee Non MSA	-	-	1	3	-	-	-	-	1	3	
State-wide Activities	2	535	1	25	-	-	-	-	3	560	
Total	9	17,571	49	114	2	4,002	-	-	60	21,687	
Source: Bank Records											

Below are the three qualified investments that impacted multiple assessment areas within the state or that benefited the broader state-wide area in Tennessee.

- The bank continues to hold \$322,731 in a prior period MBS comprised of loans made to low- and moderate-income borrowers. The investment provides affordable housing that benefits the Chattanooga MSA and Knoxville MSA assessment areas.
- The bank continues to hold \$211,789 in a prior period MBS comprised of loans made to low- and moderate-income borrowers. The investment provides affordable housing that benefits the Chattanooga MSA and Knoxville MSA assessment areas.
- In 2022, the bank donated \$25,000 to disaster relief efforts to provide essential needs for those impacted by various natural disasters.

#### SERVICE TEST

The Service Test rating for this institution is High Satisfactory in Tennessee. United Community Bank's delivery systems are reasonably accessible to essentially all portions of the institution's Tennessee assessment areas. The opening and closing of branches has improved 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 do not vary in a way that inconveniences certain portions of the assessment areas, and the bank has provided a relatively high level of community development services.

# **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. United Community Bank's operates 27 branches in Tennessee, which represents 14.9 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. Further, branches in middle- and upper-income census tracts serve approximately 16 low-income and 32 moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level in Tennessee.

	Brar	ıch Disti	ribution by (	Geograp	hy Incor	ne Level -	- Tennes	see		
Tract Income Level	Census	Census Tracts		Population		Branches		ranches	<b>Closed Branches</b>	
	#	%	#	%	#	%	#	%	#	%
Low	44	6.1	157,144	5.0	1	3.7	1	4.2	-	-
Moderate	144	19.9	565,599	17.8	5	18.5	5	20.8	-	-
Middle	312	43.0	1,433,570	45.1	14	51.9	11	45.8	3	60.0
Upper	204	28.1	985,108	31.0	7	25.9	7	29.2	2	40.0
NA	21	2.9	34,711	1.1	-	-	-	-	-	-
Totals	725	100.0	3,176,132	100.0	27	100.0	24	100.0	5	100.0
Source: 2020 U.S. Census	& Bank Dat	ta; Due to 1	ounding, totals	may not eq	ual 100.0%	6				

#### **Changes in Branch Locations**

To the extent changes were made, United Community Bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened 24 branches following the acquisition of Reliant Bank, which resulted in the delineation of the Nashville, Clarksville, and Chattanooga assessment areas. Of the 24 branches opened, one is in a low-income and five are in moderate-income census tracts. In addition, the bank closed five branches during the evaluation period; however, none of the branches were located in low- or moderate-income census tracts. The net changes in branch locations improved branch demographics when compared to assessment area demographics. More details regarding office openings and closings are provided under the Service Test analysis in those assessment areas where the changes occurred.

# **Community Development Services**

United Community Bank has provided a relatively high level of community development services in Tennessee. Bank employees provided 54 qualifying services totaling 122 hours throughout the Tennessee assessment areas. This performance represented 9.3 percent of the bank-wide community development services by number. In addition, this performance reflects a significant increase since the previous evaluation when the bank performed 29 community development services in Tennessee. Total community development services equate to 0.8 services and 1.9 hours per branch per year. The following tables detail the bank's community development services activity by assessment area and purpose during the evaluation period.

Community Dev	elopmo	ent Ser	vices in	Tennes	see by A	ssessme	nt Area	ļ		
Assessment Area	_	dable sing	Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#		#		#		#		#	
Chattanooga MSA	-	-	-	-	-	-	-	-	-	-
Clarksville MSA	-	-	2	4	2	9	-	-	4	13
Cleveland MSA	-	-	1	2	-	-	-	-	1	2
Knoxville MSA	1	6	15	44	3	3	-	-	19	53
Nashville MSA	-	-	25	42	1	2	-	-	26	44
Tennessee Non MSA	-	-	4	10	-	-	-	-	4	10
Totals	1	6	47	102	6	14	-	-	54	122
Source: July 1, 2020 through September 30, 202	23 Bank F	Records								

# KNOXVILLE MSA ASSESSMENT AREA – Full-Scope Review

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN KNOXVILLE MSA ASSESSMENT AREA

The Knoxville MSA assessment area consists of four counties, in their entirety: Blount, Knox, Loudon, and Roane, which are part of the Knoxville-Morristown-Sevierville, TN MSA. United Community Bank operates six, or 22.2 percent, of its Tennessee branches in the Knoxville MSA assessment area. By dollar volume, the assessment area accounts for 48.1 percent of the rated area loans and 26.8 percent of the rated area deposits.

Since the previous evaluation, the number of census tracts in the assessment area changed as a result of the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	11	13
Moderate	27	23
Middle	73	87
Upper	45	52
Income Not Assigned	5	7
Total	161	182
Source: 2015 ACS Data and 2020 U.S. Census Data	ı	

# **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census data and 2022 D&B data.

Demographic Information of the Knoxville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	182	7.1	12.6	47.8	28.6	3.8
Population by Geography	722,541	5.6	11.1	50.9	30.6	1.7
Housing Units by Geography	315,014	6.5	12.2	51.5	29.1	0.7
Owner-Occupied Units by Geography	195,513	2.7	10.1	54.0	33.3	0.0
Occupied Rental Units by Geography	87,860	13.7	16.8	44.5	22.7	2.2
Vacant Units by Geography	31,641	10.2	12.3	55.4	21.1	1.0
Businesses by Geography	65,082	4.6	10.8	41.5	42.0	1.1
Farms by Geography	1,740	3.0	7.1	56.9	32.6	0.3
Family Distribution by Income Level	181,615	19.2	16.8	20.7	43.3	0.0
Household Distribution by Income Level	283,373	23.0	15.7	17.3	44.0	0.0
Median Family Income MSA - 28940 Knoxville, TN MSA		\$72,608	Median Housi	ing Value		\$199,724
	•		Median Gross	Rent		\$880
			Families Belo	w Poverty Le	evel	8.3%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to Moody's Analytics, the professional and business services industry represents the largest percentage of businesses at 16.6 percent, followed by government at 13.7 percent and education and health services at 13.2 percent. Top employers throughout the assessment area include Y-12 National Security Complex; Covenant Health; the University of Tennessee; Walmart, Inc.; and the University of Tennessee Medical Center.

The unemployment rate decreased for all counties in 2021 and 2022. In addition, unemployment rates were below the state and national averages in 2020 and 2021 and were generally in line with the state and national averages in 2022. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

Unemployment Rates				
	2020	2021	2022	
Area	%	%	%	
Blount	6.4	3.6	3.1	
Knox	6.0	3.4	2.9	
Loudon	6.3	3.6	3.2	
Roane	6.4	4.2	3.7	
State of Tennessee	7.5	4.5	3.4	
National Average	8.1	5.4	3.6	
Source: Bureau of Labor Statistics	•			

#### Competition

The assessment area is competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 35 FDIC-insured financial institutions operating 174 offices in this assessment area. Of these institutions, United Community Bank ranked 10<sup>th</sup> with a 3.0 percent deposit market share. The top five financial institutions accounted for 67.0 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 587 lenders reported 29,294 residential mortgage loans for \$8.3 billion in the assessment area. United Community Bank ranked 30<sup>th</sup> with a market share of 1.0 percent by number of loans. The top five home mortgage lenders accounted for 25.1 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 147 lenders reported 15,685 small business loans for \$883.7 million. United Community Bank ranked 15<sup>th</sup> with a market share of 1.5 percent by number of loans. The top five small business lenders accounted for 46.4 percent of total market share by number of loans.

#### **Community Contact**

Examiners used an existing community contact that was recently completed with a non-profit organization that focuses on economic development. The contact indicated that eastern Tennessee is in an overall good economic condition. The assessment area has experienced rapid growth in various business industries and in population.

As a result of the population influx, the contact stated there is a need for affordable housing. The contact stated that the population growth has significantly increased housing demand, but there is not enough housing stock to meet the demand. In addition, the contact identified eastern downtown of Knoxville and the area of Western Heights as being underserved and an opportunity for redevelopment. Further, the increase in population has led to employment shortages.

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

Considering information obtained from the community contact, demographic data, and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area, 36.0 percent of families are low- and moderate-income. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (86.7 percent) and the large number of businesses with four or fewer employees (60.3 percent) support the conclusion that there is a need for small business lending. Further, revitalization and stabilization represents a need and opportunity, as 19.7 percent of census tracts are low- and moderate-income and information obtained from the community contact indicates there these geographies are underserved areas and have redevelopment needs.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN KNOXVILLE MSA ASSESSMENT AREA

#### LENDING TEST

Lending levels in the Knoxville MSA assessment area reflect good responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans reflects adequate penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment area credit needs. The bank made no community development loans.

# **Lending Activity**

United Community Bank's lending levels reflect good responsiveness to assessment area credit needs. During the review period, United Community Bank originated 1,021 home mortgage loans totaling \$247.3 million and 655 small business loans totaling \$72.4 million in the Knoxville MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

#### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the assessment area.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below aggregate performance and demographic data. Lending in moderate-income census tracts was below, but comparable to, demographic data and aggregate performance. Given the level of competition within the assessment area, performance is considered reasonable.

#### Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. Lending in low-income census tracts was below both demographic data and aggregate performance. However, lending in moderate-income census tracts was in line with demographic data and exceeded aggregate performance.

#### **Borrower Profile**

The distribution of borrowers reflects adequate penetration among borrowers of different income levels and business customers of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loan reflects adequate penetration among borrowers of different income levels. Lending to low-income borrowers was significantly below demographics, but comparable to aggregate performance. Lending to moderate-income borrowers was below, but comparable to, demographic data and aggregate performance.

#### Small Business Loans

The distribution of small business loans reflects good penetration among business customers of different sizes. Lending performance was significantly below demographic data and was below aggregate lending performance. In 2022, performance increased 14.7 percent, but remained significantly below demographics. Given the level of competition and loan demand, performance is considered good.

#### **Community Development Loans**

United Community Bank did not originated any community development loans in the Knoxville MSA assessment area during the evaluation period.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Knoxville MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

#### **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Knoxville MSA assessment area. The bank made or retained 25 investments totaling \$780,000, or 3.6 percent by dollar, of Tennessee's community development investments. This includes approximately \$36,000 in grants or donations and approximately \$744,000 in one prior period investment. This represents a slight decrease in number but significant increase in dollar

volume of qualified investments from the prior evaluation, when 28 investments totaling \$18,000 were made in this assessment area. United Community Bank's prior period investment targeted affordable housing, an identified community development need for the assessment area. A majority of grants and donations targeted community services.

Below are examples of qualified investments that benefited the Knoxville MSA assessment area.

- The bank continues to hold \$743,793 in a prior period MBS comprised of loans made to low- and moderate-income borrowers. This investment promotes affordable housing.
- From 2022 to 2023, the bank made three donations totaling \$8,750 to three organizations that focus on the provision and repair of affordable housing for low- and moderate-income individuals.
- From 2021 to 2023, the bank made five donations totaling approximately \$5,000 to an organization that provides essential community services, such as financial, health, food, and housing services, to families living in poverty.

#### **SERVICE TEST**

Delivery systems are reasonably accessible to all portions of the assessment area, and the opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank provided a relatively high level of community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to all portions of the assessment area. United Community Bank operates six branches in the Knoxville MSA assessment area, which represents 22.2 percent of the bank's branches in the state. No branches nor ATMs are located in the low- or moderate-income census tracts. However, branches in middle- and upper-income census tracts serve one low-income and five moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

Tract Income Level	Census	Tracts	Popula	ation	Brai	nches	Open B	ranches	Closed I	Branches
	#	%	#	%	#	%	#	%	#	%
Low	13	7.1	40,704	5.6	-	-	-	-	-	-
Moderate	23	12.6	80,303	11.1	-	-	-	-	-	-
Middle	87	47.8	368,078	51.0	4	66.7	-	-	-	-
Upper	52	28.6	220,934	30.6	2	33.3	-	-	-	_
NA	7	3.9	12,522	1.7	-	-	-	-	-	-
Totals	182	100.0	722,541	100.0	6	100.0	-	-	-	-

# **Community Development Services**

United Community Bank provided a relatively high level of community development services in this assessment area. During the evaluation period, bank employees participated in 19 community development services totaling 53 hours. This performance represents 35.2 percent by number and 43.4 percent by hours of all activities in the state, which is well above the amount of the assessment area's share of statewide branches at 22.2 percent. However, this performance reflects a decrease since the previous evaluation when the bank performed 23 community development services in the Knoxville MSA. The following are examples of community development services provided in the assessment area.

- In 2023, a bank employee served on the Board of a non-profit organization that provides
  access to food, assistance with utility bills, rent, and medical needs to low- and moderateincome individuals and/or families.
- In 2023, a bank employee served on the Board of an economic development organization whose mission is to increase business and workforce opportunities for low- and moderate income business owners.
- In 2023, several bank employees taught multiple sessions of a financial literacy course on the importance of savings and balancing checkbooks to students at a school where a majority qualify for free or reduced lunch.

# 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 five 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
Chattanooga MSA	Consistent	Exceeds	Consistent
Clarkesville MSA	Exceeds	Below	Consistent
Cleveland MSA	Exceeds	Below	Below
Nashville MSA	Exceeds	Consistent	Consistent
Tennessee Non MSA	Consistent	Below	Consistent

The following facts and data support the conclusions for each limited-scope assessment area. Also included are details regarding the number and dollar volume of home mortgage, small business, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Additional information is in the Limited-Scope Assessment Area Appendices.

# Chattanooga MSA Assessment Area

The Chattanooga MSA assessment area consists of Hamilton County. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	67	24,134
Small Business Loans	20	5,138
Community Development Loans	1	11,500
Investments (New)	-	-
Investments (Prior Period)	1	13,275
Donations	1	1
CD Services	-	-
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/202	0 to 9/30/2023	

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

#### Clarkesville MSA Assessment Area

The Clarkesville MSA assessment area consists of Montgomery County. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	39	5,956
Small Business Loans	22	3,081
Community Development Loans	-	-
Investments (New)	1	3,000
Investments (Prior Period)	-	-
Donations	-	-
CD Services	4	13 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

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

#### Cleveland MSA Assessment Area

The Cleveland MSA assessment area consists of Bradley and Polk counties. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	759	146,887
Small Business Loans	134	9,052
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	4	4
CD Services	1	2 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

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

#### Nashville MSA Assessment Area

The Nashville MSA assessment area consists of Cheatham, Davidson, Williamson, Maury, Robertson, Rutherford, and Sumner counties. United Community Bank operates 15 branches in this assessment area. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	365	88,915
Small Business Loans	173	43,669
Community Development Loans	1	3,200
Investments (New)	1	4,000
Investments (Prior Period)	-	-
Donations	23	64
CD Services	26	44 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/202	0 to 9/30/2023	

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

# **Tennessee Non MSA Assessment Area**

The Tennessee Non MSA assessment area consisted of McMinn, Monroe, and Hickman counties. United Community Bank operated two branches in this assessment area during the majority of the review period; however the branches were closed in August 2023. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	\$(000s)
Home Mortgage Loans	94	14,960
Small Business Loans	35	2,994
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	1	3
CD Services	4	10 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/	2023	

Tables containing lending data for the Tennessee Non MSA assessment area are in the Appendix.

## **FLORIDA**

**CRA RATING FOR FLORIDA: SATISFACTORY** 

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

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

United Community Bank has designated eight assessment areas within the State of Florida. The bank's merger with Seaside National Bank & Trust in July 2020 expanded the operations to Florida, adding the Jacksonville MSA, Miami MSA, Naples MSA, Orlando MSA, Port St Lucie MSA, Sarasota MSA, Tampa MSA, and Titusville MSA assessment areas. United Community Bank operates 18, or 9.9 percent, of its total branch offices in Florida. Florida accounts for 6.9 percent of bank-wide loans and 5.4 percent of the bank-wide deposits. Overall, United Community Bank ranks 41<sup>st</sup> in the state in deposit market share at 0.2 percent. Competitor institutions in the Florida assessment areas include Bank of America, N.A., Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Truist Bank, and Raymond James Bank.

## SCOPE OF EVALUATION – FLORIDA

The evaluation of the Florida performance considered the operations of United Community Bank in eight assessment areas detailed in the Description of Assessment Areas. 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 Miami MSA and Orlando MSA assessment areas. Limited scope reviews were performed for the Jacksonville MSA, Naples MSA, Port St Lucie MSA, Sarasota MSA, Tampa MSA, and Titusville MSA assessment areas. During the review period, small business loans received more weight than home mortgage loans when considering the number and dollar volume of these products in five of the eight assessment areas. Home mortgage loans received more weight than small business loans in the Naples MSA, Sarasota MSA, and Titusville MSA assessment areas. Refer to the following table for the distribution of lending, deposits, and branches in each assessment area.

	ea Breakdown of Loan Loan		Depos		Branches		
Assessment Area	\$(000s)	%	\$(000s)	%	#	%	
Jacksonville MSA	79,100	10.8	122,550	10.6	1	5.6	
Miami MSA	249,976	34.2	358,960	31.1	7	38.8	
Naples MSA	25,039	3.4	9,594	0.8	1	5.6	
Orlando MSA	228,356	31.2	540,829	46.8	5	27.7	
Port St. Lucie MSA	15,430	2.1	28,777	2.5	1	5.6	
Sarasota MSA	80,678	11.0	42,580	3.7	1	5.6	
Tampa MSA	34,619	4.8	27,284	2.3	1	5.6	
Titusville MSA	17,945	2.5	25,172	2.2	1	5.6	
Total	731,143	100.0	1,155,746	100.0	18	100.0	

Source: 2020, 2021, & 2022 HMDA and CRA LARs; Branch records as of 06/30/2023; FDIC Summary of Deposits as of 6/30/2023. Due to rounding, totals may not equal 100.0%;

#### CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

#### **LENDING TEST**

The Lending Test rating is Low Satisfactory. Lending levels in Florida reflect adequate responsiveness to the assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, and the distribution of loans reflects poor penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans. Performance was generally consistent among the assessment areas.

#### **Lending Activity**

United Community Bank's lending levels reflect adequate responsiveness to assessment area credit needs. Refer to each Florida assessment area analysis for details.

#### **Geographic Distribution**

Overall, the geographic distribution of loans reflects adequate penetration throughout the Florida assessment areas. Performance in the six assessment areas is consistent with the rated area performance. Performance in the Naples MSA and Titusville is below the performance of the rated area.

#### **Borrower Profile**

Overall, the distribution of borrowers reflects poor penetration among retail customers of different income levels and businesses of different sizes in Florida. Performance in six assessment areas is consistent with the rated area performance. Performance in the Jacksonville MSA and Sarasota MSA is above the rated area performance.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in Florida. During this evaluation period, the bank originated 35 community development loans totaling \$87.7 million. This performance represents 29.2 percent, by number, and 20.2 percent, by dollar volume, of total bank-wide community development loans. Additionally, six loans totaling \$16.4 million were originated outside of the assessment areas but in a broader statewide area that includes the assessment areas. Since the bank has been responsive to community development needs and opportunities inside its assessment areas, examiners gave consideration for broader statewide lending. The bank's performance in the Miami MSA, Orlando MSA, and Sarasota MSA assessment areas is consistent with this conclusion. Performance in the Tampa MSA assessment area is above the performance conclusion, while the performance for the Jacksonville MSA, Naples MSA, Port St. Lucie MSA, and Titusville MSA assessment areas is below the performance conclusion. The following table illustrates the community development loans by assessment area and purpose.

	Community Development Lending by Rated Area – Florida									
Assessment Area		Affordable Housing		Community Services		Economic Development		vitalize or tabilize	Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Jacksonville MSA	1	332	-	-	3	3,007	-	-	4	3,339
Miami MSA	-	-	-	-	5	7,045	2	3,887	7	10,932
Naples MSA	-	-	-	-	-	-	-	-	-	-
Orlando MSA	5	3,736	1	117	2	2,970	3	5,180	11	12,003
Port St. Lucie MSA	-	-	-	-	-	-	-	-	-	-
Sarasota MSA	-	-	2	18,400	-	-	-	-	2	18,400
Tampa MSA	2	376	-	-	1	1,375	2	24,885	5	26,636
Titusville MSA	-	-	-	-	-	-	-	-	-	-
State-wide Activities	4	376	-	-	-	-	2	16,033	6	16,409
Total	12	4,820	3	18,517	11	14,397	9	49,985	35	87,719
Source: Bank Records	•	•				•	•	•	•	•

The analysis for each full-scope Florida assessment area includes a detailed discussion of community development loans. Below are examples of the bank's state-wide activities in Florida.

- Four loans, through a CDFI, totaling \$376 thousand to construct affordable housing apartment buildings.
- A loan totaling \$5.3 million to refinance an office building located in a low-income census tract. The loan provided assistance in maintaining business operations and retaining jobs, thereby promoting revitalization and stabilization. The loan helps revitalize and stabilize by attracting businesses and residents to the area
- A loan totaling \$10.7 million to construct a shopping center located in a low-income census

tract. The building includes mainly government or supporting agencies focused on human and health services. The loan revitalizes and stabilizes by attracting businesses and residents to the area.

#### INVESTMENT TEST

The Investment Test performance is Low Satisfactory. The bank has an adequate level of qualified investments in Florida. The bank exhibits good responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives. Performance was generally consistent among the assessment areas.

#### **Investment and Grant Activity**

United Community Bank has an adequate level of qualified investments in Florida. The bank made or maintained 47 investments totaling \$19.1 million throughout the state, representing 5.8 percent of total bank-wide qualified community development investments by dollar volume. Included in this number are five qualified investments totaling \$506,000 that benefited the broader state-wide area in Florida that includes the assessment areas. Further, eight bank-wide qualified investment targeted Florida, as noted in the bank-wide Investment Test analysis. The majority of United Community Bank's qualified investments targeted affordable housing, an identified community development need for the assessment areas. A majority of donations targeted community services. The following table details the bank's qualified investments, grants, and donations by community development purpose.

	Q	ualified Inv	estmen	its by Rate	d Area	a – Florida					
Assessment Area		Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	
Jacksonville MSA	-	-	2	2	-	-	-	-	2	2	
Miami MSA	5	18,513	3	17	-	-	-	-	8	18,530	
Naples MSA	-	-	-	-	-	-	-	-	-	-	
Orlando MSA	4	16	16	61	-	-	-	-	20	77	
Port St. Lucie MSA	1	5	-	-	-	-	-	-	1	5	
Sarasota MSA	2	5	2	3	1	3	-	-	5	11	
Tampa MSA	2	3	3	7	-	=	-	-	5	10	
Titusville MSA	-	-	1	1	-	-	-	-	1	1	
State-wide Activities	-	-	5	506	-	-	-	-	5	506	
Total	14	18,542	32	597	1	3	-	-	47	19,142	
Source: Bank Records	•	•	•	•		•		•		•	

Below are examples of the bank's qualified investments that impacted multiple assessment areas within the state or that benefited the broader state-wide area in Florida.

- In 2023, the bank invested in a state-wide program totaling \$500,000 that provides scholarships and other financial assistance to needs-based students, based on household poverty levels.
- In 2023, the bank donated \$2,000 to an organization that provides community services targeted to low- and moderate-income individuals.
- In 2022, the bank made two donations totaling \$3,500 to an organization that provides educational and support services to students primarily from low-income families.

#### **SERVICE TEST**

The Service Test rating for this institution is Low Satisfactory in Florida. United Community Bank's delivery systems are accessible to limited portions of the institution's Florida 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 and/or to low and moderate-income individuals. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas, and the bank has provided a relatively high level of community development services.

## **Accessibility of Delivery Systems**

Delivery systems are limited to portions of the institution's assessment areas. United Community Bank's operates 23 branches in Florida, which represents 11.7 percent of bank-wide branches. As a result of the 2020 Census, the number of branches in moderate-income census tracts decreased by four. Overall, the bank does not operate any branches in low-income census tracts. The branching distribution in moderate-income census tracts is significantly below the percentage of the population in those census tracts. Although the bank offers an array of other alternative delivery systems for its customers, there are no ATMs in low- and moderate-income census tracts. However, branches in middle- and upper-income census tracts serve 5 low-income and 28 moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level in Florida.

	Branch Distribution by Geography Income Level – Florida										
Tract Income Level	Census Tracts		Popula	tion	Branches		<b>Open Branches</b>		<b>Closed Branches</b>		
	#	%	#	%	#	%	#	%	#	%	
Low	170	5.1	623,937	4.4	-	-	-	-	-	-	
Moderate	832	25.0	3,576,409	25.4	1	4.4	1	4.2	-	-	
Middle	1,138	34.2	4,919,341	34.9	9	39.1	9	37.5	-	-	
Upper	1,077	32.4	4,792,139	34.0	13	56.5	14	58.3	1	100.0	
NA	108	3.3	173,599	1.3	-	-	-	-	-	-	
Totals	3,325	100.0	14,085,425	100.0	23	100.0	24	100.0	1	100.0	
Source: 2020 U.S. Census	& Bank Dai	ta; Due to 1	ounding, totals	may not eq	ual 100.0%	6					

# **Changes in Branch Locations**

To the extent changes made, United Community Bank's record of opening and closing 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. During the evaluation period, the bank opened 24 branches following the acquisitions of Seaside National Bank & Trust and 1<sup>st</sup> National Bank of South Miami, which resulted in the delineation of the Miami MSA, Orlando MSA, Fort Walton Beach MSA, Gainesville FL MSA, Jacksonville MSA, Naples MSA, Sarasota MSA, Titusville MSA, Panama City MSA, Port St. Lucie MSA, and Tampa MSA assessment areas. Of the 24 branches opened, one branch is in a moderate-income census tract. In addition, the bank closed one branch during the review period that was not located in a low- or moderate-income census tract. The bank also relocated one branch from an upper-income census tract to a middle-income census tract. The net effect of branches opened and closed resulted in an increase of one branch in a moderate-income census tract.

## **Community Development Services**

United Community Bank has provided a relatively high level of community development services in Florida. Bank employees provided 72 qualifying services totaling 373 hours throughout the Florida assessment areas. This performance represented 12.5 percent of the bank-wide community development services by number. Total community development services equate to 1.3 services and 6.5 hours per branch per year. The following tables detail the bank's community development services activity by assessment area and purpose during the evaluation period.

Community	Developr	nent Se	rvices i	n Florid	a by As	ssessmen	t Area			
Assessment Area		rdable using		nunity vices	Economic Development		Revitalize or Stabilize		Totals	
	#	Hours	#	Hours	#	Hours	#	Hours	#	Hours
Fort Walton Beach MSA	-	-	-	-	-	-	-	-	-	-
Jacksonville MSA	2	8	1	5	1	-	ı	-	3	13
Miami MD	-	-	16	16	-	-	-	-	16	16
Orlando MSA	1	2	25	165	2	26	-	-	28	193
Naples MSA	-	-	-	-	-	-	-	-	-	-
Panama City MSA	-	-	-	-	-	-	-	-	-	-
Port St. Lucie MSA	1	2	10	10	-	-	-	-	11	12
Sarasota MSA	2	13	1	12	-	-	-	-	3	25
Titusville MSA	2	7	3	12	-	-	-	-	5	19
Tampa MSA	4	91	-	-	-	-	-	-	4	91
<b>Total in Assessment Areas</b>	12	123	56	220	2	26	-	-	70	369
State-wide Activities	-	-	2	4	-	-	-	-	2	4
Totals	12	123	58	224	2	26	-	-	72	373
Source: July 1, 2020 through September 30	, 2023 Bank I	Records						•		

# MIAMI MSA ASSESSMENT AREA – Full-Scope Review

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

The Miami MSA assessment area consists of three, contiguous counties, in their entirety: Broward Miami-Dade, and Palm Beach, all part of the Miami-Fort Lauderdale-West Palm Beach, FL MSA. United Community Bank operates seven, or 38.8 percent, of its rated area branches in the Miami MSA assessment area. By dollar volume, the assessment area accounts for 34.2 percent of rated area loans and 31.1 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area increased due to county census tract changes reported in the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	76	79
Moderate	344	394
Middle	359	456
Upper	409	512
Income Not Assigned	31	56
Total	1,219	1,497
Source: 2015 ACS Data and 2020 U.S. Census Data		

# **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census data and 2022 D&B data.

Demographic l	nformation	of the Mia	mi MSA Asses	ssment Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,497	5.3	26.3	30.5	34.2	3.7
Population by Geography	6,138,333	4.7	28.0	31.4	34.4	1.5
Housing Units by Geography	2,548,767	4.8	27.4	30.9	35.5	1.5
Owner-Occupied Units by Geography	1,299,739	2.9	21.8	32.1	42.2	1.0
Occupied Rental Units by Geography	873,001	7.8	37.4	31.0	22.0	1.8
Vacant Units by Geography	376,027	4.5	23.5	26.3	43.6	2.2
Businesses by Geography	1,969,338	2.9	22.1	29.2	43.1	2.7
Farms by Geography	23,703	3.8	24.7	30.2	40.0	1.3
Family Distribution by Income Level	1,418,815	22.5	17.6	18.0	41.9	0.0
Household Distribution by Income Level	2,172,740	24.7	16.0	16.8	42.5	0.0
Median Family Income MSA - 22744 I Lauderdale-Pompano Beach-Sunrise, F		\$73,430	Median Hous		\$321,948	
Median Family Income MSA - 33124 I Miami Beach-Kendall, Florida	Miami-	\$60,666	Median Gross Rent			\$1,449
Median Family Income MSA - 48424 N Beach-Boca Raton-Boynton Beach, Flo		\$79,785	Families Below Poverty Level			10.6%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the non-classifiable establishments industry at 36.9 percent, followed by services at 30.6 percent, and finance, insurance, and real estate at 10.4 percent represent the largest percentage of businesses. Top employers in the assessment area include Baptist Health South Florida, University of Miami, Spherion Corporation, Auto Nation, and Florida Power & Light Company.

Unemployment rates for all counties decreased in 2021 and 2022. In addition, unemployment rates were typically in line with the state and national averages during the evaluation period. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

Unemployment Rates								
<b>A</b>	2020	2021	2022					
Area	%	%	%					
Broward	9.4	7.4	2.9					
Miami-Dade	8.4	5.6	2.6					
Palm Beach	8.1	4.4	2.9					
State of Florida	8.2	4.7	2.9					
National Average	8.1	5.4	3.6					
Source: Bureau of Labor Statistics								

# **Competition**

The assessment area is highly competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 85 FDIC-insured financial institutions operating 1,350 offices in this assessment area. Of these institutions, United Community Bank ranked 48<sup>th</sup> with a 0.1 percent deposit market share. The top five financial institutions accounted for 56.7 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 1,112 lenders reported 161,008 residential mortgage loans for \$72.4 billion in the assessment area. United Community Bank ranked 194<sup>th</sup> with a market share of 0.1 percent by number of loans. The top five home mortgage lenders accounted for 21.2 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 366 lenders reported 397,236 small business loans for \$11.4 billion in the assessment area. United Community Bank ranked 66<sup>th</sup> with a market share of <0.1 percent by number of loans. The top five small business lenders accounted for 65.0 percent of total market share by number of loans.

# **Community Contact**

Examiners used an existing community contact recently conducted with an economic development organization that focuses on local, national, and international business recruitment, expansion and retention. The organization provides assistance in expansion and relocation efforts, which increased the number of businesses and new jobs to the area. The contact services the Miami-Dade County, primarily.

The contact stated that during the COVID-19 pandemic and years following, businesses recovered well because of the interest of individuals moving to the area. The majority of the workforce is employed by small businesses, typically family restaurants. The contact noted there is a cost of living crisis, and it is disproportionate in the levels of income. Home prices and rental rates have risen tremendously, creating an affordable housing issue for the area. The contact further stated that while the economy relies on tourism, there are opportunities for commercial real estate and small business loans. The contact noted there is a high level of regional and large banks in the area, while mentioning several have been active in meeting the area's credit needs.

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

Considering information obtained from the community contact, demographic, and economic data, examiners determined that small business lending and affordable housing represents a primary credit needs for the assessment area. There are 10.6 percent of families living below the poverty level and 40.1 percent of the families are low- and moderate-income, while median housing value and rental rates are high compared to median family income. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (95.0 percent) and the large number of businesses

with nine or fewer employees (96.2 percent) support the conclusion that there is a need for small business lending.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN MIAMI MSA ASSESSMENT AREA

#### LENDING TEST

Lending levels in the Miami MSA assessment area reflect adequate responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area, and the distribution of loans reflects poor penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans.

## **Lending Activity**

United Community Bank's lending levels reflect adequate responsiveness to assessment area credit needs. During the review period, United Community Bank originated 173 home mortgage loans totaling \$115.8 million and 579 small business loans totaling \$134.2 million in the Miami MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

# **Geographic Distribution**

The bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate distribution throughout the assessment area. In 2021, lending performance in low-income census tracts was below, but was comparable to, demographic data and aggregate performance. In 2022, United Community Bank did not originate any home mortgage loans in low-income geographies. However, lending in moderate-income census tracts was comparable to aggregate performance and demographic data. Given the level of competition and the loan demand within the assessment area, performance is considered adequate.

#### Small Business Loans

The geographic distribution of small business loans reflects good distribution throughout the assessment area. In 2021, lending in low-income census tracts exceeded demographic data and aggregate lending. In 2022, lending in low-income census tracts significantly exceeded demographic data. In 2021, lending in moderate-income census tracts was below, but was comparable to, demographic data and aggregate performance. In 2022, lending in moderate-income geographies increased 18.7 percent and exceeded demographic data.

# **Borrower Profile**

The distribution of loans reflects poor penetration among individuals of different income levels and businesses of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. Lending to low-income borrowers compared to aggregate performance, but was significantly below demographic data. It is noted that 10.6 percent of families were below the poverty level and may face difficulty obtaining a home mortgage loan. Lending to moderate-income borrowers was below demographic data, but comparable to aggregate performance. Given the competition within the assessment area and loan demand, lending is considered adequate.

#### Small Business Loans

The borrower distribution of small business loans reflects poor penetration among business customers of different sizes. In 2020, performance was slightly above aggregate performance, but significantly below demographic data. In 2021, lending declined 26.4 percent and was significantly below aggregate performance and demographic data. In 2022, performance continued to decline 3.4 percent and remained significantly below demographic data.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Miami MSA assessment area. United Community Bank originated seven community development loans totaling \$10.9 million. This amount represents 20.0 percent, by number, and 12.5 percent, by dollar volume, of total community development loans originated in Florida. Regarding the community development purpose, five loans supported economic development and two loans supported revitalization or stabilization. Below are examples of the bank's community development loans originated during the evaluation period.

- A PPP loan totaling \$2.0 million to a business operating in a moderate-income census tract. The loan provided assistance in maintaining business operations and to retain jobs, thereby promoting revitalization and stabilization.
- An SBA 504 loan totaling \$1.6 million to expand a drug and alcohol treatment center. The
  purpose of the loan is for expansion and job creation, which supports economic
  development.
- An SBA 504 loan totaling \$2.0 million to construct a warehouse and showroom in a moderate-income census tract. The purpose of the loan is for expansion and job creation, which supports economic development.

#### INVESTMENT TEST

The bank has a significant level of qualified community development investments and grants in the Miami MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

# **Investment and Grant Activity**

United Community Bank has a significant level of qualified community development investments in the Miami MSA assessment area. The bank made or retained eight investments totaling \$18.5 million, or 96.8 percent by dollar, of Florida's community development investments. This includes approximately \$30,000 in grants or donations and approximately \$8.5 million in a prior period investment. The prior period investment targeted affordable housing, and donations targeted both affordable housing and community services.

Below are examples of qualified investments that benefited the Miami MSA assessment area.

- In 2021, the bank invested \$10.0 million in an MBS comprised of multi-family properties, where the majority of the units are designated for low- and moderate-income individuals. This investment promotes affordable housing.
- The bank continues to hold \$8.5 million in a prior period MBS secured by a 210-unit apartment complex where the units qualified for Section 8 housing that promotes affordable housing.
- In 2023, the bank made two donations totaling \$7,500 to an organization that builds affordable homes for low- and moderate-income individuals.

#### SERVICE TEST

Delivery systems are accessible to limited portions of the assessment area, and the opening and closing of branches has generally not adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank provided an adequate level of community development services.

## **Accessibility of Delivery Systems**

Delivery systems are limited to portions of the assessment area. United Community Bank operates seven branches in the Miami MSA assessment area, which represents 38.9 percent of the bank's branches in the state. Although the bank offers an array of other alternative delivery systems for its customers, the bank does not operate any branches or ATMs in the low- and moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

	Branch Distribution by Geography Income Level – Miami MSA									
Tract Income Level	Census	Tracts	Popula	tion	Brai	Branches		ranches	<b>Closed Branches</b>	
	#	%	#	%	#	%	#	%	#	%
Low	79	5.3	289,246	4.7	-	-	-	-	-	-
Moderate	394	26.3	1,717,177	28.0	-	-	-	-	-	-
Middle	456	30.5	1,930,045	31.4	1	14.3	1	12.5	-	-
Upper	512	34.2	2,108,912	34.4	6	85.7	7	87.5	1	100.0
NA	56	3.7	92,953	1.5	-	-	-	-	-	-
Totals	1,497	100.0	6,138,333	100.0	7	100.0	8	100.0	1	100.0
Source: 2020 U.S. Census	& Bank Dat	ta; Due to 1	ounding, total	s may not e	qual 100.0%	6	-		•	-

#### **Changes in Branch Locations**

To the extent of the changes made, United Community Bank's record of opening and closing branches has not generally adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened eight branches and closed one branch in the Miami MSA assessment area. None of the opening and closures were in low- or moderate-income census tracts.

# **Community Development Services**

United Community Bank provided an adequate level of community development services in this assessment area. During the evaluation period, bank employees participated in 16 community development services totaling 16 hours. This performance represents 22.2 percent by number and 4.3 percent by hours of all activities in the state, which is below the assessment area's share of statewide branches at 38.9 percent. Community development services equate to 0.7 services and 0.7 hours per branch per year. During the review period, a bank employee shared financial expertise on the importance of managing finances through the mentorship program of a non-profit organization whose mission is to provide education opportunities to low-income students.

# **ORLANDO MSA ASSESSMENT AREA – Full-Scope Review**

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

The Orlando MSA assessment area consists of Lake, Orange, and Seminole Counties, which are part of the Orlando-Kissimmee-Sanford, Florida MSA. The merger with Seaside National Bank & Trust in July 2020 included branches in Orange and Seminole counties. The bank opened a branch in Lake County in February 2021, which expanded the assessment area to three counties.

United Community Bank operates five, or 27.7 percent, of its rated area branches in the Orlando MSA assessment area. By dollar volume, the assessment area accounts for 31.2 percent of rated area loans and 46.8 percent of rated area deposits. Since the previous evaluation, the number of census tracts in the assessment area increased due to county census tract changes reported in the 2020 U.S. Census. The following table reflects the changes in census tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

Tract Income Level	# of Census Tracts 2015 ACS	# of Census Tracts 2020 U.S. Census
Low	12	19
Moderate	98	117
Middle	125	144
Upper	113	145
Income Not Assigned	1	6
Total	349	431
Source: 2015 ACS Data and 2020 U.S. Census Data		

# **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census data and 2022 D&B data.

Demographic I	nformation o	of the Orla	ndo MSA Asso	essment Are	a	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	431	4.4	27.1	33.4	33.6	1.4
Population by Geography	2,284,720	4.1	24.7	33.1	36.8	1.2
Housing Units by Geography	898,284	3.8	26.2	34.2	34.7	1.0
Owner-Occupied Units by Geography	482,721	1.6	20.9	35.3	41.9	0.3
Occupied Rental Units by Geography	300,894	6.3	33.1	33.7	24.9	2.0
Vacant Units by Geography	114,669	6.3	30.5	31.1	30.5	1.7
Businesses by Geography	506,373	2.5	24.1	31.6	40.5	1.2
Farms by Geography	9,899	2.4	24.2	37.0	35.8	0.6
Family Distribution by Income Level	523,725	20.8	17.3	19.0	42.9	0.0
Household Distribution by Income Level	783,615	22.2	17.0	18.4	42.4	0.0
Median Family Income MSA - 36740 ( Kissimmee-Sanford, Florida MSA	\$70,774	Median Hous	Median Housing Value			
			Median Gross	s Rent		\$1,296
			Families Belo	w Poverty L	evel	9.4%

Source: 2020 U.S. Census and 2022 D&B Data; Due to rounding, totals may not equal 100.0%; (\*) The NA category consists of geographies that have not been assigned an income classification.

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 33.0 percent, followed by non-classifiable establishments at 32.3 percent and finance, insurance, and real estate at 9.7 percent. Top employers in the assessment area include Walt Disney World Resort, AdventHealth, Publix Super Markets Inc., University of Central Florida, and Lockheed Martin.

The unemployment rates for all counties decreased in 2021 and 2022. In addition, unemployment rates were typically higher in Lake and Orange Counties than the state and national averages during the evaluation period. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation.

Unemployment Rates							
	2020	2021	2022				
Area	%	%	%				
Lake	9.3	4.8	3.0				
Orange	11.2	5.2	2.9				
Seminole	7.7	4.1	2.7				
State of Florida	8.2	4.7	2.9				
National Average	8.1	5.4	3.6				
Source: Bureau of Labor Statistics							

# **Competition**

The assessment area is highly competitive in the financial services market. According to the FDIC's June 30, 2023 Deposit Market Share Report, there are 46 FDIC-insured financial institutions operating 415 offices in this assessment area. Of these institutions, United Community Bank ranked 19<sup>th</sup> with 0.8 percent deposit market share. The top five financial institutions accounted for 70.7 percent of total market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2022, 702 lenders reported 61,272 residential mortgage loans for \$21.8 billion in the assessment area. United Community Bank ranked 32<sup>nd</sup> with a market share of 0.6 percent by number of loans. The top five home mortgage lenders accounted for 32.1 percent of total market share by number of loans.

There is a high level of competition for small business loans. In 2021, 178 lenders reported 43,510 small business loans for \$1.8 billion. United Community Bank ranked 18<sup>th</sup> with a market share of 1.3 percent by number of loans. The top five small business lenders accounted for 52.8 percent of total market share by number of loans.

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

Considering information obtained from demographic and economic data, examiners determined that affordable housing represents a primary credit need for the assessment area. The low- and moderate-income families level of 38.1 percent combined with the high median housing value and

age of housing stock support this conclusion. In addition, small business loans are a credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (93.9 percent) and the large number of businesses with nine or fewer employees (85.6 percent) support the conclusion that there is a need for small business lending.

# CONCLUSIONS ON PERFORMANCE CRITERIA IN ORLANDO MSA ASSESSMENT AREA

#### **LENDING TEST**

Lending levels in the Orlando MSA assessment area reflect adequate responsiveness to the assessment area's credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans reflects poor penetration among individuals of different incomes and small businesses of different sizes. The institution makes extensive use of innovative and flexible lending practices in order to serve the assessment areas' credit needs. The bank has made a relatively high level of community development loans.

#### **Lending Activity**

United Community Bank's lending levels reflect adequate responsiveness to assessment area credit needs. During the review period, United Community Bank originated 141 home mortgage loans totaling \$78.6 million and 715 small business loans totaling \$149.7 million in the Orlando MSA assessment area. The Competition section discussed the bank's market share rankings for home mortgage and small business lending.

#### **Geographic Distribution**

The bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate distribution throughout the assessment area. In 2021, United Community Bank did not extend any loans in low-income census tracts. In 2022, lending increased 1.4 percent and was in line with demographic data and aggregate performance. In 2021, lending in moderate-income census tracts was significantly below demographic data and aggregate performance. In 2022, lending in moderate-income census tracts increased 13.1 percent and was below demographic data, but comparable to aggregate performance.

#### Small Business Loans

The geographic distribution of small business loans reflects adequate distribution throughout the assessment area. In 2021, United Community Bank did not originate any small business loans in low-income geographies. However, only a small number of businesses are located within these

geographies, which limits lending opportunities. However, performance in moderate-income geographies exceeded aggregate performance and demographic data.

# **Borrower Profile**

The distribution of loans reflects poor penetration among individuals of different income levels and businesses of different sizes.

# Home Mortgage Loans

The distribution of home mortgage loans reflects adequate penetration among borrowers of different income levels. Lending to low-income borrowers compared to aggregate performance, but was significantly below demographic data. In 2021, lending to moderate-income borrowers was significantly below aggregate performance and demographic data. However, in 2022, the bank's performance increased 4.3 percent, but remained below aggregate data and demographics.

#### Small Business Loans

The borrower distribution of small business loans reflects poor penetration among business customers of different sizes. In 2020, lending was slightly below aggregate performance, but significantly below demographic data. In 2021, lending declined 24.0 percent and was significantly below aggregate performance and demographic data. In 2022, lending increased 8.7 percent, but remained significantly below demographic data.

# **Community Development Loans**

United Community Bank has made a relatively high level of community development loans in the Orlando MSA assessment area. United Community Bank originated 11 community development loans totaling \$12.0 million. This amount represents 31.4 percent, by number, and 13.7 percent, by dollar volume, of total community development loans originated in Florida. Regarding the community development purpose, five loans supported affordable housing, one loan supported community services, two loans supported economic development, and three loans supported revitalization or stabilization. Below are examples of the bank's community development loans originated during the evaluation period.

- A loan totaling \$2.0 million is a renewal of a line of credit to a nonprofit organization that constructs affordable housing throughout the assessment area. The loan promotes affordable housing.
- A loan totaling \$2.1 million to redevelop a vacant commercial building in a gas station and three additional commercial outparcels for additional retail space located in a moderate-income census tract. The loan will help revitalize and stabilize the area and create new jobs.
- A PPP loan totaling \$2.0 million to a business operating in a moderate-income census tract. The loan provided in maintaining business operations and to retain jobs, thereby promoting revitalization and stabilization.

#### INVESTMENT TEST

The bank has an adequate level of qualified community development investments and grants in the Orlando MSA assessment area. The bank exhibits excellent responsiveness to credit and community development needs. The bank occasionally uses innovative and complex investments to support community development initiatives.

# **Investment and Grant Activity**

United Community Bank has an adequate level of qualified community development investments in the Orlando MSA assessment area. The bank made or retained 20 donations totaling \$77,000, or 0.4 percent by dollar, of Florida's community development investments. The majority of United Community Bank's donations targeted community services.

Below are examples of qualified donations that benefited the Orlando MSA assessment area.

- From 2022 to 2023, the bank made three donations totaling \$14,450 to an organization that builds affordable homes for low- and moderate-income individuals.
- In 2022, the bank donated \$25,000 to an organization that provides financial literacy, education, and career readiness services to students primarily from low- and moderate-income families and who qualify for free and reduced lunch.
- In 2021, the bank donated \$2,500 to an organization that provides medical services targeted to those who are underserved and uninsured.

## **SERVICE TEST**

Delivery systems are limited to portions of the assessment area, and the opening and closing of branches has not generally adversely affected the accessibility of its delivery systems. Services and business hours do not vary in a way that inconveniences certain portions of the assessment areas. The bank was a leader in providing community development services.

#### **Accessibility of Delivery Systems**

Delivery systems are accessible to limited portions of the assessment area. United Community Bank operates five branches in the Orlando MSA assessment area, which represents 21.7 percent of the bank's branches in the state. As a result of the 2020 Census, the number of branches in moderate-income census tracts decreased by three. As of 2022, the bank did not operate any branches or ATMs in low- or moderate-income census tracts. The following table reflects the bank's branch distribution by tract income level for the assessment area.

	Branch Distribution by Geography Income Level – Orlando MSA													
Tract Income Level	Census Tracts		Popula	tion	Brar	iches	Open B	ranches	<b>Closed Branches</b>					
	#	%	#	%	#	%	#	%	#	%				
Low	19	4.4	93,343	4.1	-	-	-	-	-	-				
Moderate	117	27.2	565,192	24.7	-	-	-	-	-	-				
Middle	144	33.4	757,355	33.2	2	40.0	2	40.0	-	-				
Upper	145	33.6	841,440	36.8	3	60.0	3	60.0	-	_				
NA	6	1.4	27,390	1.2	-	-	-	-	-	-				
Totals	431	100.0	2,284,720	100.0	5	100.0	5	100.0	-	-				
Source: 2020 U.S. Census	& Bank Dat	ta; Due to i	ounding, total.	s may not e	qual 100.0%	ó	-		•	-				

#### **Changes in Branch Locations**

To the extent of the changes made, United Community Bank's record of opening and closing branches has generally not adversely impacted the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened five branches in the Orlando MSA assessment area. None of the opening and closures were in low- or moderate-income census tracts.

# **Community Development Services**

United Community Bank was a leader in providing community development services in this assessment area. During the evaluation period, bank employees participated in 28 community development services totaling 193 hours. This performance represents 38.9 percent by number and 51.7 percent by hours of all activities in the state, which significantly exceeds the assessment area's share of statewide branches at 21.7 percent. Community development services equate to 1.7 services and 11.9 hours per branch per year. The following are examples of community development services provided in the assessment area.

- In 2022 and 2023, several bank employees educated students on financial life skills by collaborating with an organization whose mission is to increase economic mobility to low-and moderate-income individuals. The employees provided interactive financial literacy sessions on lending and credit score information.
- From 2020 to 2022, a bank employee served on a university's foundation board and investment committee to support the university mission of providing financial support to those in need. The foundation assists in the solicitation of donations and the management of endowment of funds that supports the scholarships for students that are limited financially.
- From 2020 to 2022, a bank employee served as an officer for an organization that provides shelter and food for the homeless, mentors the disadvantaged, and cares for the sick. The organization also hosts various events at underserved schools where the majority of the students receive free or reduced lunch.

# 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 six 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	<b>Lending Test</b>	Investment Test	Service Test
Jacksonville MSA	Consistent	Consistent	Consistent
Naples MSA	Below	Consistent	Below
Port St. Lucie MSA	Consistent	Consistent	Consistent
Sarasota MSA	Consistent	Consistent	Consistent
Tampa MSA	Consistent	Consistent	Exceeds
Titusville MSA	Below	Consistent	Consistent

The following facts and data support the conclusions for each limited-scope assessment area. Also included are details regarding the number and dollar volume of home mortgage, small business, and community development loans originated during the review period; qualified investments (new and prior period) and donations during the review period; and community development services for the review period. Additional information is in the Limited-Scope Assessment Area Appendices.

#### Jacksonville MSA Assessment Area

The Jacksonville MSA assessment area consists of Duval and St. Johns counties. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	93	40,002
Small Business Loans	161	39,098
Community Development Loans	4	3,339
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	2	2
CD Services	3	13 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

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

# Naples MSA Assessment Area

The Naples MSA assessment area consists of Collier County. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	28	16,917
Small Business Loans	26	8,122
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	-	-
CD Services	-	-
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to	9/30/2023	

# Geographic Distribution and Borrower Profile

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

#### Port St. Lucie MSA Assessment Area

The Port St. Lucie MSA assessment area consists of Martin County. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	12	5,695
Small Business Loans	48	9,735
Community Development Loans	=	-
Investments (New)	=	-
Investments (Prior Period)	=	-
Donations	1	5
CD Services	11	12 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

# Geographic Distribution and Borrower Profile

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

#### Sarasota MSA Assessment Area

The Sarasota MSA assessment area consists of Manatee and Sarasota counties. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	135	66,263
Small Business Loans	73	14,415
Community Development Loans	2	18,400
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	5	11
CD Services	3	25 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023	3	

# Tampa MSA Assessment Area

The Tampa MSA assessment area consists of Hillsborough and Pinellas counties. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	39	14,180
Small Business Loans	104	20,439
Community Development Loans	5	26,636
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	5	10
CD Services	4	91 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30	/2023	

# Geographic Distribution and Borrower Profile

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

## Titusville MSA Assessment Area

The Titusville MSA assessment area consists of Brevard County. United Community Bank 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	#	\$(000s)
Home Mortgage Loans	19	16,800
Small Business Loans	2	1,145
Community Development Loans	-	-
Investments (New)	-	-
Investments (Prior Period)	-	-
Donations	1	1
CD Services	5	19 hours
Source: 2020-2022 HDMA and CRA LARs; Bank Data from 7/1/2020 to 9/30/2023		

## **APPENDICES**

#### 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.

## **SCOPE OF EVALUATION**

# **United Community Bank**

# **Scope of Examination:**

Full scope reviews were performed on following assessment areas within the noted rate areas:

State of Georgia

Atlanta Assessment Area Georgia Non MSA Assessment Area

State of North Carolina

North Carolina Non MSA Assessment Area Raleigh MSA Assessment Area

State of South Carolina

Greenville MSA Assessment Area Charleston MSA Assessment Area

State of Tennessee

Knoxville MSA Assessment Area

State of Florida

Miami MSA Assessment Area Orlando Assessment Area

**Time Period Reviewed:** 07/01/2020 to 09/30/2023

**Products Reviewed:** 

Home Mortgage: 01/01/2020 – 12/31/2022 Small Business: 01/01/2020 – 12/31/2022

	List of Assessment Areas	and Type of Evaluation			
Rated Area/ Assessment Area	Type of Evaluation	Branches Visited	Other Information		
	Geor	·gia			
Atlanta MSA	Full-Scope	None	None		
Georgia Non MSA	Full-Scope	None	None		
Athens MSA	Limited-Scope	None	None		
Brunswick MSA	Limited-Scope	None	None		
Gainesville MSA	Limited-Scope	None	None		
Rome MSA	Limited-Scope	None	None		
Savannah MSA	Limited-Scope	None	None		
Rated Area/	Type of Evaluation	Branches Visited	Other Information		
Assessment Area	Type of Evaluation	Branches visited	Other Information		
	North C	arolina			
North Carolina Non MSA	Full-Scope	None	None		
Raleigh MSA	Full-Scope	None	None		
Asheville MSA	Limited-Scope	None	None		

	List of Assessment Areas a	nd Type of Evaluation			
Charlotte MSA	Limited-Scope	None	None		
Fayetteville MSA	Limited-Scope	None	None		
Wilmington MSA	Limited-Scope	None	None		
	South Car	olina			
Greenville MSA	Full-Scope	None	None		
Charleston MSA	Full-Scope	None	None		
Columbia MSA	Limited-Scope	None	None		
Hilton Head MSA	Limited-Scope	None	None		
Myrtle Beach MSA	Limited-Scope	None	None		
South Carolina Non MSA	Limited-Scope	None	None		
Spartanburg MSA	Limited-Scope	None	None		
	Tenness	see			
Knoxville MSA	Full-Scope	None	None		
Chattanooga MSA	Limited-Scope	None	None		
Clarkesville MSA	Limited-Scope	None	None		
Cleveland MSA	Limited-Scope	None	None		
Nashville MSA	Limited-Scope	None	None		
Tennessee Non MSA	Limited-Scope	None	None		
·	Florid	a			
Miami MSA	Full-Scope	None	None		
Orlando MSA	Full-Scope	None	None		
Jacksonville MSA	Full-Scope	None	None		
Naples MSA	Limited-Scope	None	None		
Port St. Lucie MSA	Limited-Scope	None	None		
Sarasota MSA	Limited-Scope	None	None		
Tampa MSA	Limited-Scope	None	None		
Titusville MSA	Limited-Scope	None	None		

# SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	<b>Lending Test</b>	Investment Test	Service Test	Rating
Georgia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
North Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
South Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Tennessee	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

# LENDING PERFORMANCE TABLES

# Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2022

	Tota	al Home M	ortgage	Loans	Low-l	ncome 7	Γracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-	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	
Athens MSA	86	16,859	2.2	5,216	5.0	4.7	5.2	16.3	19.8	14.1	34.6	33.7	35.1	44.1	41.9	45.6	0.0	0.0	0.0	
Atlanta MSA	1,708	483,544	44.3	217,770	3.0	1.8	3.3	19.0	21.8	19.2	35.6	39.9	37.2	41.2	35.7	38.8	1.2	0.8	1.6	
Brunswick MSA	87	22,019	2.3	2,827	1.6	1.1	1.2	22.1	13.8	14.1	38.2	31.0	36.6	36.5	47.1	44.5	1.7	6.9	3.6	
Gainesville GA MSA	246	49,790	6.4	7,289	2.0	0.8	1.1	9.3	4.5	7.8	52.2	61.8	53.8	33.7	30.1	35.5	2.7	2.8	1.9	
Georgia Non MSA	1,480	296,252	38.4	15,483	0.0	0.0	0.0	7.3	5.5	4.3	54.0	64.5	50.0	38.0	29.2	44.9	0.7	0.7	0.8	
Rome MSA	162	30,817	4.2	2,627	0.0	0.0	0.0	18.6	11.7	20.1	39.9	37.7	39.1	39.1	42.6	38.3	2.4	8.0	2.5	
Savannah MSA	89	25,270	2.3	9,678	5.7	6.7	5.0	24.9	15.7	20.5	34.5	23.6	42.3	33.4	51.7	29.7	1.5	2.2	2.5	
Total	3,858	924,551	100.0	260,890	2.8	1.1	3.1	18.1	13.7	17.9	37.3	49.9	38.6	40.5	33.9	38.9	1.3	1.4	1.6	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

# Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Total	Loans to S	mall Bu	isinesses	Low-l	Income T	Γracts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Athens MSA	145	15,031	3.3	4,803	11.1	8.3	9.8	10.1	17.9	12.3	32.1	40.7	33.1	45.7	33.1	44.5	1.0	0.0	0.3
Atlanta MSA	2,337	326,432	52.8	245,288	6.2	3.2	5.5	23.2	22.4	22.3	31.0	35.6	31.5	39.2	38.6	40.5	0.4	0.2	0.3
Brunswick MSA	124	13,119	2.8	2,466	7.1	12.9	5.8	27.2	25.0	23.5	19.8	16.1	19.1	45.9	46.0	51.6	0.0	0.0	0.0
Gainesville GA MSA	282	34,796	6.4	5,466	8.8	10.6	7.9	16.5	17.7	17.0	41.5	46.1	42.1	33.2	25.5	33.1	0.0	0.0	0.0
Georgia Non MSA	1,063	87,627	24.0	8,589	1.0	0.4	0.4	4.5	3.3	4.0	60.4	69.4	58.3	34.0	26.9	37.3	0.0	0.0	0.0
Rome MSA	183	23,376	4.1	1,863	3.3	4.9	3.4	42.1	35.5	39.6	31.9	38.3	33.6	22.6	21.3	23.5	0.0	0.0	0.0
Savannah MSA	292	58,644	6.6	9,513	8.7	11.0	8.6	24.0	23.6	22.6	31.7	30.1	32.3	35.4	34.9	36.4	0.2	0.3	0.1
Total	4,426	559,025	100.0	277,988	6.3	4.0	5.5	22.5	18.1	21.6	32.0	43.8	32.5	38.9	34.0	40.2	0.4	0.1	0.3

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%

# Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	Tot	al Home M	ortgage l	Loans	Low-In	come Bo	rrowers	Moderate-	-Income	Borrowers	Middle-I	ncome E	Borrowers	Upper-Ii	ncome B	orrowers		vailable- Borrowe	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Athens MSA	86	16,859	2.2	5,216	23.9	7.0	5.7	16.2	11.6	15.4	16.7	26.7	20.9	43.1	44.2	42.4	0.0	10.5	15.5
Atlanta MSA	1,708	483,544	44.3	217,770	21.5	7.0	6.5	17.0	18.0	18.2	19.6	22.2	21.3	41.9	50.4	35.9	0.0	2.4	18.1
Brunswick MSA	87	22,019	2.3	2,827	23.8	10.3	4.9	14.6	8.0	12.2	17.7	19.5	17.8	43.9	60.9	48.1	0.0	1.1	16.9
Georgia Non MSA	1,480	296,252	38.4	15,483	16.8	5.5	3.2	16.8	11.1	9.3	19.3	19.6	18.2	47.2	60.1	52.9	0.0	3.6	16.4
Gainesville GA MSA	246	49,790	6.4	7,289	20.3	8.5	5.9	18.5	15.4	18.3	20.1	20.3	22.3	41.0	50.0	35.5	0.0	5.7	17.9
Rome MSA	162	30,817	4.2	2,627	23.4	5.6	7.1	16.4	11.1	19.0	20.0	21.0	21.9	40.2	61.1	31.2	0.0	1.2	20.9
Savannah MSA	89	25,270	2.3	9,678	24.3	2.2	4.4	18.3	10.1	16.5	18.4	14.6	21.7	39.0	64.0	38.2	0.0	9.0	19.2
Total	3,858	924,551	100.0	260,890	21.5	6.4	6.2	17.0	14.4	17.5	19.5	20.9	21.1	42.1	55.0	37.2	0.0	3.3	18.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

# Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	7	Total Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses wi Not Ava	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Athens MSA	145	15,031	3.3	4,803	88.7	49.0	48.7	2.7	29.7	8.6	21.4
Atlanta MSA	2,337	326,432	52.8	245,288	93.1	40.2	42.2	2.1	29.1	4.8	30.7
Brunswick MSA	124	13,119	2.8	2,466	88.9	49.2	42.8	2.8	28.2	8.2	22.6
Gainesville MSA	282	34,796	6.4	5,466	89.8	36.9	45.3	3.7	29.1	6.5	34.0
Georgia Non MSA	1,063	87,627	24.0	8,589	89.9	47.2	47.2	2.4	14.3	7.7	38.5
Rome MSA	183	23,376	4.1	1,863	87.2	43.2	41.3	3.4	32.2	9.4	24.6
Savannah MSA	292	58,644	6.6	9,513	88.8	46.9	41.5	3.0	34.9	8.1	18.2
Total	4,426	559,025	100.0	277,988	92.6	42.8	42.5	2.2	26.1	5.2	31.2

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%

# Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2022

	Tota	al Home M	ortgage	Loans	Low-I	ncome 1	Tracts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Asheville MSA	332	88,026	19.3	15,703	0.8	0.3	1.2	14.9	10.8	15.1	61.0	61.4	60.4	22.9	27.1	23.0	0.4	0.3	0.3
Charlotte MSA	181	61,818	10.5	52,100	2.6	2.8	3.0	23.6	11.1	20.8	27.0	22.1	28.1	46.2	63.5	47.5	0.5	0.6	0.6
North Carolina Non MSA	807	174,494	46.8	11,854	0.0	0.0	0.0	13.8	7.9	10.9	67.6	74.8	61.8	17.7	17.0	26.3	1.0	0.2	1.0
Raleigh MSA	388	147,868	22.5	61,272	4.3	7.0	3.9	18.2	27.3	18.4	37.4	38.9	41.4	38.7	25.5	35.1	1.3	1.3	1.3
Wilmington MSA	15	4,811	0.9	10,083	2.3	0.0	2.0	22.0	6.7	22.9	33.6	40.0	34.7	41.2	53.3	39.7	0.9	0.0	0.8
Total	1,723	477,017	100.0	151,012	2.6	1.9	2.9	19.2	13.2	18.6	40.9	58.3	39.9	36.4	26.1	37.7	0.8	0.5	0.9

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

# Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Total	Loans to S	mall Bus	sinesses	Low-I	ncome T	racts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Asheville MSA	184	25,803	11.4	13,494	3.0	3.3	3.0	14.7	23.9	15.8	53.5	59.2	53.3	28.8	13.6	27.8	0.0	0.0	0.0
Fayetteville MSA	49	4,755	3.0	2,392	0.0	0.0	0.0	12.8	16.3	11.7	64.1	59.2	65.2	23.1	24.5	23.0	0.0	0.0	0.0
North Carolina Non MSA	812	61,487	50.2	9,282	0.0	0.0	0.0	9.3	10.0	10.5	71.2	79.8	68.7	19.4	10.1	20.7	0.0	0.1	0.0
Raleigh MSA	572	65,352	35.4	43,311	3.9	3.7	3.7	23.3	42.0	23.3	33.0	40.9	34.1	39.6	13.3	38.8	0.1	0.2	0.0
Total	1,617	157,397	100.0	68,479	3.1	1.7	3.0	19.5	23.1	19.7	43.0	63.1	43.7	34.3	12.1	33.6	0.1	0.1	0.0

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%

# Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	Tot	al Home M	ortgage	Loans	Low-In	come Bo	rrowers	Moderate-	-Income	Borrowers	Middle-I	ncome B	Borrowers	Upper-Ii	ncome B	orrowers		vailable- Borrowe	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Asheville MSA	332	88,026	19.3	15,703	20.0	4.2	6.3	17.9	15.1	16.7	21.9	25.3	21.7	40.2	53.3	45.9	0.0	2.1	9.4
Charlotte MSA	181	61,818	10.5	52,100	20.5	3.9	5.8	17.3	8.3	15.5	18.7	16.6	20.6	43.5	64.1	45.9	0.0	7.2	12.2
NC Non MSA	807	174,494	46.8	11,854	20.2	6.9	4.7	18.5	14.6	13.4	20.7	18.8	18.3	40.7	56.8	52.3	0.0	2.9	11.3
Raleigh MSA	388	147,868	22.5	61,272	21.3	10.8	8.0	16.6	18.0	18.2	20.8	21.6	23.9	41.4	40.2	38.8	0.0	9.3	11.1
Wilmington MSA	15	4,811	0.9	10,083	22.2	0.0	6.2	17.2	13.3	15.7	18.7	13.3	18.8	41.9	66.7	46.5	0.0	6.7	12.9
Total	1,723	477,017	100.0	151,012	20.8	6.9	6.7	17.2	14.8	16.6	20.1	20.4	21.7	41.9	53.2	43.6	0.0	4.6	11.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

# Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	1	Total Loans to S	Small Businesse	es	Businesses	with Revenues	<= 1MM	Businesses wit 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Asheville MSA	184	25,803	11.4	13,494	89.7	42.9	49.6	3.1	21.2	7.2	35.9
Fayetteville MSA	49	4,755	3.0	2,392	89.6	49.0	49.7	2.7	14.3	7.6	36.7
North Carolina Non MSA	812	61,487	50.2	9,282	86.6	43.7	53.7	3.4	15.5	10.0	40.8
Raleigh MSA	572	65,352	35.4	43,311	89.4	40.0	46.6	3.0	27.3	7.6	32.7
Гotal	1,617	157,397	100.0	68,479	89.1	42.5	48.3	3.0	20.3	7.8	37.2
Fotal	1,617	157,397	100.0	68,479	89.1	42.5	48.3	3.0	20.3		7.8

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%

I	Assessment Area D	Distribution of	Home Mortgage	Loans by Income	Category of th	e Geography

	Tota	al Home M	ortgage	Loans	Low-l	ncome [	Γracts	Moderat	e-Incon	ne Tracts	Middle-	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inc	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Charleston MSA	238	119,258	18.3	37,711	4.6	1.3	2.6	22.8	10.9	17.2	33.6	31.9	35.4	38.4	53.4	44.0	0.6	2.5	0.7
Columbia MSA	82	37,323	6.3	25,283	1.9	1.2	1.1	16.9	8.5	12.4	41.3	29.3	41.4	39.1	59.8	44.1	0.8	1.2	0.9
Greenville MSA	507	103,177	39.0	32,173	2.9	1.4	2.7	20.0	15.2	17.7	43.1	35.5	41.0	33.7	47.3	37.6	0.4	0.6	1.0
Hilton Head MSA	89	38,110	6.9	9,486	1.2	1.1	0.9	13.6	12.4	9.9	51.1	52.8	50.0	34.1	33.7	39.2	0.0	0.0	0.0
Myrtle Beach MSA	166	36,371	12.8	20,422	1.9	2.4	1.3	16.6	17.5	14.0	65.6	65.7	66.3	15.9	14.5	18.4	0.0	0.0	0.0
SC Non MSA	46	6,103	3.5	2,749	1.8	4.3	0.7	15.0	13.0	11.5	49.6	54.3	48.3	33.6	28.3	39.5	0.0	0.0	0.0
Spartanburg MSA	171	24,764	13.2	12,729	2.3	1.2	1.6	10.1	8.2	9.7	59.6	59.6	55.4	27.5	31.0	33.1	0.5	0.0	0.2
Total	1,299	365,106	100.0	140,553	2.8	1.5	1.9	18.1	13.1	14.7	45.4	43.3	45.3	33.3	41.3	37.4	0.4	0.8	0.6

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

### Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Total	Loans to S	mall Bu	sinesses	Low-l	Income 1	Γracts	Moderat	te-Incon	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Charleston MSA	288	58,216	17.9	25,339	7.6	6.3	7.0	18.6	12.8	16.0	34.6	27.4	34.0	37.6	49.7	41.3	1.5	3.8	1.7
Columbia MSA	78	20,057	4.8	17,225	9.0	3.8	6.3	20.2	6.4	18.2	31.3	35.9	31.7	38.8	50.0	43.5	0.7	3.8	0.3
Greenville MSA	643	84,558	40.0	22,224	6.0	7.6	5.3	18.4	18.5	15.8	39.2	34.2	38.9	36.3	39.7	40.0	0.0	0.0	0.0
Hilton Head MSA	40	5,277	2.5	6,193	0.0	0.0	0.0	16.1	5.0	14.9	54.3	62.5	53.3	29.6	32.5	31.8	0.0	0.0	0.0
Myrtle Beach MSA	253	36,325	15.7	11,485	5.4	8.3	5.5	14.3	13.0	13.1	62.6	64.0	64.6	17.1	13.8	16.3	0.7	0.8	0.5
South Carolina Non MSA	108	10,306	6.7	1,831	3.3	4.6	3.2	14.4	8.3	12.5	44.0	38.9	42.4	38.4	48.1	41.9	0.0	0.0	0.0
Spartanburg MSA	199	27,093	12.4	7,527	2.4	1.0	1.8	20.8	15.6	17.2	40.2	38.7	42.4	36.7	44.7	38.7	0.0	0.0	0.0
Total	1,609	241,832	100.0	91,824	6.2	6.1	5.3	18.3	14.7	15.9	40.1	39.3	40.7	34.8	38.9	37.4	0.6	1.0	0.6

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%

### Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	Tot	al Home M	[ortgage]	Loans	Low-In	come Bo	orrowers	Moderate	-Income	Borrowers	Middle-I	ncome E	Borrowers	Upper-Iı	icome B	orrowers		vailable- Borrowe	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Charleston MSA	238	119,258	18.3	37,711	22.1	4.6	6.2	17.2	10.1	17.9	20.1	17.6	19.6	40.6	56.7	34.8	0.0	10.9	21.5
Columbia MSA	82	37,323	6.3	25,283	21.9	2.4	7.8	16.3	9.8	20.7	19.1	23.2	22.5	42.6	54.9	31.1	0.0	9.8	18.0
Greenville MSA	507	103,177	39.0	32,173	20.9	6.1	7.3	18.0	15.2	19.5	20.2	19.5	22.2	40.9	53.1	36.2	0.0	6.1	14.7
Hilton Head MSA	89	38,110	6.9	9,486	19.0	6.7	4.9	17.1	11.2	15.2	21.2	22.5	18.9	42.8	53.9	48.9	0.0	5.6	12.2
Myrtle Beach MSA	166	36,371	12.8	20,422	21.2	10.8	6.0	19.2	14.5	16.4	21.8	19.9	20.7	37.8	50.0	41.4	0.0	4.8	15.4
South Carolina Non MSA	46	6,103	3.5	2,749	20.0	8.7	4.3	18.9	10.9	16.4	18.2	17.4	23.9	42.9	52.2	38.7	0.0	10.9	16.7
Spartanburg MSA	171	24,764	13.2	12,729	20.1	9.9	6.4	18.2	14.6	21.0	20.8	22.8	25.1	40.9	44.4	32.0	0.0	8.2	15.5
Total	1,299	365,106	100.0	140,553	21.2	6.9	6.6	17.6	13.3	18.6	20.2	20.0	21.4	41.0	52.3	36.2	0.0	7.5	17.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

## Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	7	Total Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses with 1M		Businesses wi Not Av	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charleston MSA	288	58,216	17.9	25,339	85.5	51.0	45.2	4.2	23.3	10.4	25.7
Columbia MSA	78	20,057	4.8	17,225	83.6	47.4	47.6	4.5	30.8	11.9	21.8
Greenville MSA	643	84,558	40.0	22,224	83.7	41.7	48.0	4.9	28.1	11.4	30.2
Hilton Head MSA	40	5,277	2.5	6,193	87.4	47.5	45.0	4.0	25.0	8.6	27.5
Myrtle Beach MSA	253	36,325	15.7	11,485	85.7	36.8	45.6	3.9	35.6	10.4	27.7
South Carolina Non MSA	108	10,306	6.7	1,831	80.0	43.5	51.0	5.3	19.4	14.7	37.0
Spartanburg MSA	199	27,093	12.4	7,527	82.4	41.7	46.0	5.4	26.6	12.2	31.7
Total	1,609	241,832	100.0	91,824	84.4	43.1	46.5	4.5	27.7	11.1	29.1

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%

	Assessment Area Di	istribution of Home	Mortgage Loans	s by Income C	ategory of the Geography
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	To	tal Home M	Iortgage	Loans	Low-I	ncome 7	Γracts	Moderat	e-Incon	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inc	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Chattanooga MSA	67	24,134	6.9	13,892	4.2	1.5	4.1	11.2	16.4	11.4	44.0	34.3	41.0	39.5	47.8	42.8	1.1	0.0	0.7
Clarkesville MSA	39	5,956	4.0	12,671	0.4	2.6	0.6	15.8	20.5	14.8	41.4	33.3	47.0	42.4	43.6	37.7	0.0	0.0	0.0
Cleveland MSA	188	38,156	19.4	4,177	0.6	0.0	0.8	6.4	13.3	10.1	75.5	64.4	70.1	17.4	22.3	19.1	0.0	0.0	0.0
Knoxville MSA	280	61,772	28.9	29,294	2.7	0.7	3.3	10.1	6.8	10.1	54.0	58.2	52.5	33.3	34.3	34.0	0.0	0.0	0.2
Nashville MSA	365	88,915	37.7	76,612	2.4	3.8	2.8	17.8	27.4	16.5	44.3	41.4	42.6	35.0	26.8	37.1	0.6	0.5	1.0
Tennessee Non MSA	30	3,235	3.1	762	0.0	0.0	0.0	0.0	0.0	0.0	94.5	93.3	96.9	5.5	6.7	3.2	0.0	0.0	0.0
Total	969	222,168	100.0	137,408	2.4	1.9	2.8	14.3	16.8	14.1	48.3	51.5	46.1	34.5	29.6	36.4	0.4	0.2	0.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

### Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Total	Loans to	Small Bu	ısinesses	Low-l	Income T	Tracts	Modera	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ible-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Cleveland MSA	39	2,970	13.9	2,029	7.0	0.0	5.9	13.0	30.8	12.4	50.2	48.7	45.5	29.8	20.5	36.1	0.0	0.0	0.0
Knoxville MSA	241	25,789	86.1	15,627	4.6	1.2	3.8	12.9	12.9	11.9	42.7	51.0	43.6	39.2	34.9	40.4	0.5	0.0	0.2
Total	280	28,759	100.0	17,656	4.9	1.1	4.1	12.9	15.4	12.0	43.7	50.7	43.8	38.0	32.9	39.9	0.4	0.0	0.2

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%

### Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	To	tal Home M	Iortgage	Loans	Low-In	come Bo	rrowers	Moderate	-Income	Borrowers	Middle-I	ncome E	Borrowers	Upper-Ii	icome B	orrowers		ailable- Sorrowe	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Chattanooga MSA	67	24,134	6.9	13,892	19.3	4.5	4.7	16.3	10.4	14.9	19.1	13.4	20.0	45.3	67.2	44.9	0.0	4.5	15.5
Clarkesville MSA	39	5,956	4.0	12,671	17.6	2.6	2.2	17.6	25.6	12.3	21.0	17.9	25.9	43.8	43.6	37.5	0.0	10.3	22.1
Cleveland MSA	188	38,156	19.4	4,177	20.9	5.9	6.3	18.7	24.5	18.4	20.4	23.9	24.3	40.0	45.7	35.7	0.0	0.0	15.3
Knoxville MSA	280	61,772	28.9	29,294	19.3	5.4	7.5	16.8	12.1	18.3	20.7	21.4	21.7	43.3	59.3	38.3	0.0	1.8	14.3
Nashville MSA	365	88,915	37.7	76,612	20.5	7.7	6.8	17.5	17.5	17.9	21.4	21.6	20.0	40.6	43.8	40.0	0.0	9.3	15.4
Tennessee Non MSA	30	3,235	3.1	762	14.1	13.3	4.6	22.7	16.7	17.3	22.0	23.3	26.0	41.2	43.3	38.5	0.0	3.3	13.6
Total	969	222,168	100.0	137,408	19.8	6.4	6.3	17.3	17.1	17.2	20.9	21.4	21.1	42.0	50.3	39.7	0.0	4.9	15.8

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

## Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	Т	Cotal Loans to S	Small Businesse	es	Businesses	with Revenues	<= 1MM	Businesses wit 1M		Businesses wi Not Ava	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland MSA	39	2,970	13.9	2,029	86.0	56.4	50.2	4.0	10.3	10.0	33.3
Knoxville MSA	241	25,789	86.1	15,627	85.3	35.3	47.5	4.4	36.1	10.3	28.6
Total	280	28,759	100.0	17,656	85.4	38.2	47.8	4.4	32.5	10.2	29.3

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%

### Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2022

	Tot	tal Home M	Iortgage	Loans	Low-I	ncome '	Γracts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inc	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Jacksonville MSA	46	15,351	15.0	53,770	4.3	4.3	3.0	21.6	19.6	20.3	36.0	28.3	39.9	37.6	47.8	36.3	0.5	0.0	0.5
Miami MSA	97	63,479	31.7	161,008	2.9	0.0	2.4	21.8	19.6	20.4	32.1	26.8	32.0	42.2	52.6	44.1	1.0	1.0	1.1
Naples MSA	8	4,963	2.6	16,116	2.3	0.0	1.1	17.4	25.0	18.5	40.7	25.0	44.7	38.4	50.0	34.5	1.2	0.0	1.2
Orlando MSA	73	46,133	23.9	69,522	1.6	1.4	1.6	20.9	15.1	17.7	35.3	21.9	35.2	41.9	61.6	45.2	0.3	0.0	0.3
Port St Lucie MSA	2	360	0.7	5,602	0.5	0.0	1.3	8.2	0.0	5.1	27.8	50.0	26.9	61.3	50.0	64.5	2.2	0.0	2.2
Sarasota MSA	43	23,838	14.1	37,397	1.2	0.0	0.5	18.1	11.6	14.9	46.7	32.6	41.9	33.8	55.8	42.0	0.2	0.0	0.7
Tampa MSA	18	6,581	5.9	84,610	1.4	0.0	1.6	18.8	33.3	17.8	40.4	16.7	39.5	38.8	50.0	40.5	0.6	0.0	0.6
Titusville MSA	19	16,800	6.2	27,026	0.8	0.0	0.9	18.4	10.5	19.4	45.6	26.3	45.6	34.6	63.2	33.5	0.5	0.0	0.6
Total	306	177,505	100.0	455,051	2.3	1.0	1.9	20.3	17.6	18.7	36.5	26.1	36.8	40.2	54.9	41.8	0.7	0.3	0.8

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

#### 2021

### Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

	Tota	al Loans to	Small B	usinesses	Low-I	ncome T	Γracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ible-Inco	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
Jacksonville MSA	45	9,637	8.4	39,970	5.1	6.7	5.0	22.1	22.2	21.4	30.7	8.9	29.2	42.0	62.2	44.4	0.0	0.0	0.0
Miami MSA	198	47,860	37.1	395,476	4.1	5.6	4.4	22.2	18.2	23.5	28.3	19.7	28.5	44.1	56.6	42.4	1.2	0.0	1.2
Naples MSA	8	2,572	1.5	17,665	2.8	0.0	3.0	14.3	0.0	12.7	37.9	12.5	39.8	45.1	87.5	44.4	0.0	0.0	0.0
Orlando MSA	231	50,399	43.3	90,264	1.4	0.0	1.4	23.5	23.8	22.4	34.6	31.6	35.1	40.5	44.6	41.1	0.0	0.0	0.0
Port St Lucie MSA	12	2,195	2.2	7,334	0.0	0.0	0.0	14.7	33.3	16.8	34.8	66.7	32.4	50.5	0.0	50.8	0.0	0.0	0.0
Sarasota MSA	17	3,057	3.2	31,452	1.4	0.0	1.2	19.6	17.6	17.6	43.6	41.2	42.8	35.4	41.2	38.4	0.0	0.0	0.0
Tampa MSA	23	4,923	4.3	92,095	5.0	8.7	5.4	17.9	13.0	18.5	33.7	21.7	34.3	43.1	56.5	41.5	0.3	0.0	0.3
Total	534	120,643	100.0	674,256	3.7	3.0	4.0	21.3	20.8	21.9	31.2	25.7	31.2	43.0	50.6	42.2	0.7	0.0	0.7

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%

### Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	To	tal Home N	lortgage	Loans	Low-In	come Bo	rrowers	Moderate-	-Income	Borrowers	Middle-I	ncome B	Sorrowers	Upper-Ii	ncome B	orrowers		vailable- Borrowe	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Jacksonville MSA	46	15,351	15.0	53,770	21.9	0.0	5.9	18.5	19.6	15.7	19.2	6.5	20.6	40.4	65.2	39.1	0.0	8.7	18.7
Miami MSA	97	63,479	31.7	161,008	22.5	2.1	3.1	17.6	6.2	9.2	18.0	14.4	16.7	41.9	64.9	53.4	0.0	12.4	17.6
Naples MSA	8	4,963	2.6	16,116	21.9	0.0	4.2	18.0	37.5	12.0	19.6	12.5	18.5	40.5	50.0	52.4	0.0	0.0	12.9
Orlando MSA	73	46,133	23.9	69,522	20.8	4.1	4.3	17.3	8.2	13.6	19.0	12.3	21.4	42.9	67.1	45.4	0.0	8.2	15.4
Port St Lucie MSA	2	360	0.7	5,602	15.9	0.0	4.9	14.3	0.0	11.7	17.8	0.0	17.9	52.1	100.0	53.1	0.0	0.0	12.4
Sarasota MSA	43	23,838	14.1	37,397	18.8	4.7	5.7	19.6	14.0	15.1	20.4	16.3	20.8	41.2	58.1	45.0	0.0	7.0	13.3
Tampa MSA	18	6,581	5.9	84,610	20.3	5.6	4.7	17.4	16.7	14.0	18.9	11.1	20.8	43.4	61.1	45.5	0.0	5.6	15.1
Titusville MSA	19	16,800	6.2	27,026	20.0	0.0	6.5	18.5	5.3	16.0	20.2	5.3	22.1	41.3	78.9	38.4	0.0	10.5	17.0
Total	306	177,505	100.0	455,051	21.3	2.6	4.4	17.8	11.1	12.5	18.7	12.1	19.4	42.2	65.0	47.4	0.0	9.2	16.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available; Due to rounding, totals may not equal 100.0%

### Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	,	Fotal Loans to	Small Businesso	es	Businesses	with Revenues	s <= 1MM	Businesses with 1M		Businesses wi Not Ava	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Jacksonville MSA	45	9,637	8.4	39,970	92.1	13.3	43.1	2.3	15.6	5.6	71.1
Miami MSA	198	47,860	37.1	395,476	94.4	15.7	42.9	1.9	21.7	3.7	62.6
Naples MSA	8	2,572	1.5	17,665	93.5	25.0	46.8	2.0	50.0	4.4	25.0
Orlando MSA	231	50,399	43.3	90,264	93.1	14.3	45.2	2.0	31.2	4.9	54.5
Port St Lucie MSA	12	2,195	2.2	7,334	92.3	8.3	45.1	2.4	25.0	5.3	66.7
Sarasota MSA	17	3,057	3.2	31,452	93.1	17.6	50.1	2.1	17.6	4.8	64.7
Tampa MSA	23	4,923	4.3	92,095	92.7	8.7	45.8	2.3	30.4	5.0	60.9
Total	534	120,643	100.0	674,256	93.7	14.6	44.1	2.0	26.0	4.3	59.4

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%

### DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

#### **GEORGIA**

#### **Athens MSA**

Demograp	hic Inform	ation of the	Assessment A	rea		
	Assessment	Area: Athe	ens MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	52	9.6	23.1	26.9	40.4	0.0
Population by Geography	200,590	12.0	22.4	28.7	37.0	0.0
Housing Units by Geography	80,062	10.0	23.4	30.0	36.6	0.0
Owner-Occupied Units by Geography	39,551	5.0	16.3	34.6	44.1	0.0
Occupied Rental Units by Geography	35,128	15.6	31.1	24.2	29.1	0.0
Vacant Units by Geography	5,383	11.0	25.1	33.4	30.5	0.0
Businesses by Geography	24,071	7.3	16.8	25.9	49.9	0.0
Farms by Geography	988	3.7	17.3	33.1	45.9	0.0
Family Distribution by Income Level	43,613	23.9	16.2	16.7	43.1	0.0
Household Distribution by Income Level	74,679	26.7	15.3	15.2	42.8	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$71,301	Median Hous	ing Value		\$213,961
			Median Gross	s Rent		\$870
			Families Belo	w Poverty I	evel	11.0%

Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 18 financial institutions operated 44 branches within the assessment area. Of these institutions, United Community Bank ranked 8<sup>th</sup> with a 3.4 percent deposit market share.

**Brunswick MSA** 

Demograp	ohic Infor	mation of t	he Assessmen	t Area		
As	sessment	Area: Bru	nswick MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	3.8	26.9	30.8	30.8	7.7
Population by Geography	84,499	4.3	31.0	34.0	29.2	1.5
Housing Units by Geography	43,486	4.1	29.3	33.7	31.0	1.9
Owner-Occupied Units by Geography	22,228	1.6	22.1	38.2	36.5	1.7
Occupied Rental Units by Geography	11,963	10.1	48.5	26.0	14.6	0.7
Vacant Units by Geography	9,295	2.5	21.8	32.8	39.1	3.8
Businesses by Geography	13,304	7.1	30.5	26.1	33.0	3.3
Farms by Geography	307	3.6	22.1	33.2	37.5	3.6
Family Distribution by Income Level	22,560	23.8	14.6	17.7	43.9	0.0
Household Distribution by Income Level	34,191	22.3	15.1	17.7	44.9	0.0
Median Family Income MSA - 15260 Brunswick, GA MSA		\$68,432	Median Housing Value			\$219,411
		•	Median Gross	s Rent		\$943
	Families Below Poverty Level					

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 13 financial institutions operated 27 branches within the assessment area. Of these institutions, United Community Bank ranked 5<sup>th</sup> with a 10.2 percent deposit market share.

Gainesville, GA MSA

Demograp	hic Inform	nation of t	he Assessmen	t Area		
Asses	ssment Ar	ea: Gaines	ville, GA MS	4		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	8.0	12.0	50.0	26.0	4.0
Population by Geography	203,136	7.4	12.1	51.7	26.1	2.7
Housing Units by Geography	74,544	6.7	11.0	53.2	25.9	3.2
Owner-Occupied Units by Geography	45,199	2.0	9.3	52.2	33.7	2.7
Occupied Rental Units by Geography	20,356	17.5	13.4	54.3	11.1	3.7
Vacant Units by Geography	8,989	5.6	14.0	55.7	20.4	4.3
Businesses by Geography	24,775	9.4	12.0	49.7	25.2	3.7
Farms by Geography	832	5.2	11.3	54.8	26.1	2.6
Family Distribution by Income Level	49,002	20.3	18.5	20.1	41.0	0.0
Household Distribution by Income Level	65,555	21.8	17.0	19.0	42.1	0.0
Median Family Income MSA - 23580 Gainesville, GA MSA		\$74,139	Median Housing Value			\$213,562
			Median Gross	s Rent		\$1,053
	Families Below Poverty Level					

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 15 financial institutions operated 37 branches within the assessment area. Of these institutions, United Community Bank ranked 3<sup>rd</sup> with a 13.7 percent deposit market share.

Rome MSA

Demograp	ohic Infor	mation of t	he Assessmen	t Area		
	Assessme	nt Area: R	ome MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	26.9	38.5	30.8	3.8
Population by Geography	98,584	0.0	26.9	40.0	31.2	1.9
Housing Units by Geography	40,713	0.0	28.6	38.1	31.6	1.7
Owner-Occupied Units by Geography	22,616	0.0	18.6	39.9	39.1	2.4
Occupied Rental Units by Geography	13,576	0.0	43.0	36.9	18.9	1.2
Vacant Units by Geography	4,521	0.0	35.6	32.6	31.8	0.0
Businesses by Geography	9,998	0.0	42.3	29.5	27.0	1.2
Farms by Geography	322	0.0	19.9	38.8	36.3	5.0
Family Distribution by Income Level	25,405	23.4	16.4	20.0	40.2	0.0
Household Distribution by Income Level	36,192	23.3	19.3	15.3	42.1	0.0
Median Family Income MSA - 40660 Rome, GA MSA		\$61,841	Median Housing Value			\$139,298
			Median Gross	s Rent		\$780
Families Below Poverty Level						14.0%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 9 financial institutions operated 16 branches within the assessment area. Of these institutions, United Community Bank ranked 1<sup>st</sup> with a 17.8 percent deposit market share.

Savannah MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area			
	Assessment	Area: Sav	annah MSA				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	88	10.2	34.1	26.1	23.9	5.7	
Population by Geography	295,291	10.1	31.0	33.4	22.7	2.8	
Housing Units by Geography	126,234	9.9	31.7	30.8	25.9	1.7	
Owner-Occupied Units by Geography	61,038	5.7	24.9	34.5	33.4	1.5	
Occupied Rental Units by Geography	48,830	14.0	40.8	28.5	15.3	1.4	
Vacant Units by Geography	16,366	13.4	29.9	24.0	29.9	2.8	
Businesses by Geography	47,402	12.1	30.1	30.3	24.7	2.7	
Farms by Geography	779	6.8	29.9	33.4	28.2	1.7	
Family Distribution by Income Level	66,947	24.3	18.3	18.4	39.0	0.0	
Household Distribution by Income Level	109,868	24.6	17.5	17.3	40.6	0.0	
Median Family Income MSA - 42340 Savannah, GA MSA		\$75,128	Median Hous	sing Value		\$231,922	
			Median Gros	s Rent		\$1,097	
	Families Below Poverty Level						

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 21 financial institutions operated 67 branches within the assessment area. Of these institutions, United Community Bank ranked  $8^{th}$  with a 3.9 percent deposit market share.

### **NORTH CAROLINA**

### Asheville MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
	Assessmen	t Area: Ash	neville MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	116	0.9	18.1	57.8	20.7	2.6
Population by Geography	447,822	1.0	18.1	60.2	20.5	0.3
Housing Units by Geography	219,727	0.9	17.5	60.4	20.7	0.4
Owner-Occupied Units by Geography	123,072	0.8	14.9	61.0	22.9	0.4
Occupied Rental Units by Geography	58,711	1.5	21.8	59.9	16.5	0.4
Vacant Units by Geography	37,944	0.7	19.5	59.4	20.1	0.3
Businesses by Geography	61,059	0.8	19.6	56.7	22.7	0.2
Farms by Geography	1,969	0.7	18.1	62.1	18.7	0.4
Family Distribution by Income Level	111,284	20.0	17.9	21.9	40.2	0.0
Household Distribution by Income Level	181,783	23.1	16.7	17.6	42.5	0.0
Median Family Income MSA - 11700 Asheville, NC MSA		\$71,595	Median Hous	ing Value		\$255,762
			Median Gross	s Rent		\$966
			Families Belo	ow Poverty L	evel	7.3%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 21 financial institutions operated 97 branches within the assessment area. Of these institutions, United Community Bank ranked 9<sup>th</sup> with a 2.7 percent deposit market share.

#### **Charlotte MSA**

Demogr	raphic Infor	mation of t	he Assessmen	t Area		
	Assessment	Area: Cha	rlotte MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	351	6.0	26.5	25.6	39.6	2.3
Population by Geography	1,302,175	5.2	27.0	27.4	39.3	1.0
Housing Units by Geography	531,221	5.5	27.4	26.4	39.3	1.4
Owner-Occupied Units by Geography	287,123	2.6	23.6	27.0	46.2	0.5
Occupied Rental Units by Geography	203,201	9.2	32.3	26.4	29.7	2.4
Vacant Units by Geography	40,897	6.9	29.7	21.9	38.2	3.3
Businesses by Geography	221,184	4.8	23.8	23.4	45.8	2.2
Farms by Geography	3,353	3.8	29.2	27.7	38.5	0.9
Family Distribution by Income Level	305,990	20.5	17.3	18.7	43.5	0.0
Household Distribution by Income Level	490,324	21.4	16.9	17.9	43.8	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value			\$272,852
			Median Gros	s Rent		\$1,196
			Families Belo	ow Poverty I	Level	7.8%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 38 financial institutions operated 283 branches within the assessment area. Of these institutions, United Community Bank ranked 14<sup>th</sup> with a 0.1 percent deposit market share.

# Fayetteville MSA

Demogr	aphic Infor	mation of t	the Assessmen	t Area		
	Assessment	Area: Fayo	etteville MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	7.1	60.7	32.1	0.0
Population by Geography	133,568	0.0	7.2	59.2	33.6	0.0
Housing Units by Geography	52,531	0.0	9.1	60.4	30.5	0.0
Owner-Occupied Units by Geography	30,780	0.0	8.4	58.0	33.6	0.0
Occupied Rental Units by Geography	15,745	0.0	11.0	64.2	24.8	0.0
Vacant Units by Geography	6,006	0.0	7.7	62.4	29.9	0.0
Businesses by Geography	10,090	0.0	8.6	61.3	30.1	0.0
Farms by Geography	445	0.0	9.2	58.4	32.4	0.0
Family Distribution by Income Level	31,740	18.2	15.4	20.9	45.5	0.0
Household Distribution by Income Level	46,525	22.6	14.3	16.9	46.2	0.0
Median Family Income MSA - 22180 Fayetteville, NC MSA		\$61,027	Median Hous	Median Housing Value		
			Median Gros	s Rent		\$969
			Families Belo	ow Poverty I	Level	11.3%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) The NA category consists of geographies that have not been assigned an income classification.

# **Deposit Market Share Information**

The bank did not have any branches in the Fayetteville MSA as of June 30, 2023.

## Wilmington MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area			
	Assessment .	Area: Wiln	nington MSA				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	55	7.3	29.1	27.3	30.9	5.5	
Population by Geography	225,702	4.6	27.0	32.6	33.3	2.4	
Housing Units by Geography	113,125	5.6	27.2	32.3	34.1	0.8	
Owner-Occupied Units by Geography	57,212	2.3	22.0	33.6	41.2	0.9	
Occupied Rental Units by Geography	40,786	10.3	37.8	31.3	19.7	0.8	
Vacant Units by Geography	15,127	5.4	18.1	30.2	45.7	0.6	
Businesses by Geography	38,341	4.1	27.2	25.1	42.6	0.9	
Farms by Geography	729	3.0	33.3	27.0	35.5	1.1	
Family Distribution by Income Level	54,049	22.2	17.2	18.7	41.9	0.0	
Household Distribution by Income Level	97,998	25.4	15.5	17.2	41.9	0.0	
Median Family Income MSA - 48900 Wilmington, NC MSA		\$78,711	Median Hous	ing Value		\$276,572	
			Median Gros	s Rent		\$1,044	
	Families Below Poverty Level						

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 20 financial institutions operated 52 branches within the assessment area. Of these institutions, United Community Bank ranked 17<sup>th</sup> with a 0.3 percent deposit market share.

#### **SOUTH CAROLINA**

### Columbia MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area			
	Assessment	Area: Col	umbia MSA				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	190	5.3	22.6	36.8	31.6	3.7	
Population by Geography	710,138	3.4	21.0	38.8	33.4	3.4	
Housing Units by Geography	301,293	3.6	23.3	40.0	32.1	1.0	
Owner-Occupied Units by Geography	179,685	1.9	16.9	41.3	39.1	0.8	
Occupied Rental Units by Geography	91,013	6.2	33.6	38.4	20.5	1.3	
Vacant Units by Geography	30,595	5.6	30.6	37.8	24.7	1.3	
Businesses by Geography	98,881	3.2	22.2	36.5	36.4	1.7	
Farms by Geography	2,166	1.9	19.0	42.0	36.3	0.7	
Family Distribution by Income Level	170,816	21.9	16.3	19.1	42.6	0.0	
Household Distribution by Income Level	270,698	23.0	16.0	17.7	43.3	0.0	
Median Family Income MSA - 17900 Columbia, SC MSA		\$71,993	Median Hous	ing Value		\$173,839	
			Median Gross	s Rent		\$988	
	Families Below Poverty Level						

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 24 financial institutions operated 139 branches within the assessment area. Of these institutions, United Community Bank ranked 19<sup>th</sup> with a 0.2 percent deposit market share.

**Hilton Head MSA** 

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
A	Assessment A	Area: Hilto	n Head MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	18.6	37.2	37.2	4.7
Population by Geography	187,117	1.7	18.8	51.5	27.0	1.1
Housing Units by Geography	101,059	1.7	14.9	45.2	38.2	0.0
Owner-Occupied Units by Geography	55,533	1.2	13.6	51.1	34.1	0.0
Occupied Rental Units by Geography	18,698	3.6	29.4	50.4	16.6	0.0
Vacant Units by Geography	26,828	1.4	7.4	29.6	61.6	0.0
Businesses by Geography	30,022	3.0	10.6	48.4	37.9	0.1
Farms by Geography	711	4.1	16.0	56.7	23.2	0.0
Family Distribution by Income Level	50,858	19.0	17.1	21.2	42.8	0.0
Household Distribution by Income Level	74,231	21.6	16.0	18.7	43.7	0.0
Median Family Income MSA - 25940 Hilton Head Island-Bluffton, SC MSA		\$79,770	Median Housing Value			\$353,487
			Median Gross	s Rent		\$1,308
			Families Belo	ow Poverty I	evel	6.9%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 19 financial institutions operated 52 branches within the assessment area. Of these institutions, United Community Bank ranked 15<sup>th</sup> with a 0.6 percent deposit market share.

**Myrtle Beach MSA** 

Demogr	aphic Infor	mation of t	he Assessmen	t Area			
Α	ssessment A	Area: Myrt	le Beach MSA	<u>.</u>			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	78	3.8	19.2	59.0	16.7	1.3	
Population by Geography	351,029	3.6	20.4	62.9	13.2	0.0	
Housing Units by Geography	210,354	2.7	15.8	59.2	22.4	0.0	
Owner-Occupied Units by Geography	100,572	1.9	16.6	65.6	15.9	0.0	
Occupied Rental Units by Geography	35,647	6.6	29.2	52.7	11.4	0.0	
Vacant Units by Geography	74,135	1.8	8.2	53.5	36.5	0.0	
Businesses by Geography	46,316	6.8	19.9	53.8	19.5	0.0	
Farms by Geography	1,213	3.5	19.4	65.6	11.5	0.0	
Family Distribution by Income Level	86,930	21.2	19.2	21.8	37.8	0.0	
Household Distribution by Income Level	136,219	23.6	17.7	19.9	38.8	0.0	
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$65,152	Median Housing Value			\$206,100	
			Median Gross	s Rent		\$989	
	Families Below Poverty Level						

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 20 financial institutions operated 106 branches within the assessment area. Of these institutions, United Community Bank ranked 11<sup>th</sup> with a 4.3 percent deposit market share.

**South Carolina Non MSA** 

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
Asses	ssment Area	a: South Ca	rolina Non M	ISA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	2.9	17.6	50.0	29.4	0.0
Population by Geography	125,567	3.5	17.6	49.0	29.9	0.0
Housing Units by Geography	56,224	4.3	18.2	47.7	29.8	0.0
Owner-Occupied Units by Geography	32,161	1.8	15.0	49.6	33.6	0.0
Occupied Rental Units by Geography	16,595	9.0	23.1	41.1	26.8	0.0
Vacant Units by Geography	7,468	5.0	20.8	54.2	20.0	0.0
Businesses by Geography	9,791	3.4	14.5	43.9	38.2	0.0
Farms by Geography	352	0.3	9.9	55.4	34.4	0.0
Family Distribution by Income Level	28,765	20.0	18.9	18.2	42.9	0.0
Household Distribution by Income Level	48,756	24.4	16.7	17.6	41.2	0.0
Median Family Income Non-MSAs - SC			Median Housing Value			\$117,278
			Median Gros	s Rent		\$719
			Families Belo	ow Poverty I	evel	13.9%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 10 financial institutions operated 23 branches within the assessment area. Of these institutions, United Community Bank ranked 5<sup>th</sup> with a 13.1 percent deposit market share.

# Spartanburg MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area			
A	ssessment A	Area: Spar	tanburg MSA				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	87	5.7	19.5	50.6	21.8	2.3	
Population by Geography	327,997	4.2	15.0	54.9	24.7	1.2	
Housing Units by Geography	131,725	4.3	16.2	55.6	23.1	0.9	
Owner-Occupied Units by Geography	84,689	2.3	10.1	59.6	27.5	0.5	
Occupied Rental Units by Geography	34,099	8.5	27.4	46.8	15.3	1.9	
Vacant Units by Geography	12,937	5.7	26.2	52.3	15.2	0.5	
Businesses by Geography	32,622	2.9	14.6	50.4	31.1	1.0	
Farms by Geography	961	2.1	9.6	61.6	26.4	0.3	
Family Distribution by Income Level	80,467	20.1	18.2	20.8	40.9	0.0	
Household Distribution by Income Level	118,788	24.1	16.2	18.1	41.7	0.0	
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$65,214	Median Hous	Median Housing Value		\$149,727	
			Median Gross	s Rent		\$809	
	Families Below Poverty Level						

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 20 financial institutions operated 58 branches within the assessment area. Of these institutions, United Community Bank ranked 5<sup>th</sup> with a 5.4 percent deposit market share.

**TENNESSEE** 

### Chattanooga MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
A	Assessment A	Area: Chat	tanooga MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	9.2	17.2	37.9	32.2	3.4
Population by Geography	366,207	7.7	12.8	41.4	37.3	0.8
Housing Units by Geography	163,605	8.5	14.2	41.9	34.5	0.9
Owner-Occupied Units by Geography	95,010	4.2	11.2	44.0	39.5	1.1
Occupied Rental Units by Geography	53,286	15.2	18.0	40.0	26.0	0.7
Vacant Units by Geography	15,309	11.8	19.2	35.2	32.7	1.1
Businesses by Geography	45,164	7.4	16.8	34.6	40.5	0.8
Farms by Geography	976	4.7	12.1	43.8	38.8	0.6
Family Distribution by Income Level	89,372	19.3	16.3	19.1	45.3	0.0
Household Distribution by Income Level	148,296	22.4	16.6	17.1	43.9	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA			Median Hous	ing Value		\$202,001
			Median Gros	s Rent		\$919
			Families Belo	ow Poverty L	evel	8.2%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 21 financial institutions operated 94 branches within the assessment area. Of these institutions, United Community Bank ranked 14<sup>th</sup> with a 0.3 percent deposit market share.

#### Clarkesville MSA

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
	Assessment .	Area: Clar	kesville MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	2.2	23.9	39.1	32.6	2.2
Population by Geography	220,069	1.2	19.5	43.3	35.9	0.2
Housing Units by Geography	82,742	1.8	21.1	43.1	33.9	0.0
Owner-Occupied Units by Geography	45,436	0.4	15.8	41.4	42.4	0.0
Occupied Rental Units by Geography	29,170	3.6	28.2	46.7	21.5	0.0
Vacant Units by Geography	8,136	3.7	25.4	39.7	31.2	0.0
Businesses by Geography	14,536	1.2	27.9	34.3	36.5	0.0
Farms by Geography	479	0.4	14.0	30.1	55.5	0.0
Family Distribution by Income Level	53,135	17.6	17.6	21.0	43.8	0.0
Household Distribution by Income Level	74,606	18.8	15.9	18.9	46.4	0.0
Median Family Income MSA - 17300 Clarksville, TN-KY MSA		\$65,849	Median Hous	ing Value		\$171,034
			Median Gross	s Rent		\$997
Families Below Poverty Level						

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 11 financial institutions operated 43 branches within the assessment area. Of these institutions, United Community Bank ranked 7<sup>th</sup> with a 6.9 percent deposit market share.

#### **Cleveland MSA**

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
	Assessment	Area: Cle	veland MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	3.2	16.1	67.7	12.9	0.0
Population by Geography	126,164	2.3	14.7	68.8	14.2	0.0
Housing Units by Geography	53,225	2.3	13.5	70.3	13.9	0.0
Owner-Occupied Units by Geography	32,756	0.6	6.4	75.5	17.4	0.0
Occupied Rental Units by Geography	15,422	5.5	28.3	59.6	6.6	0.0
Vacant Units by Geography	5,047	3.0	13.8	69.4	13.8	0.0
Businesses by Geography	9,654	1.2	22.8	64.8	11.2	0.0
Farms by Geography	344	0.0	6.4	79.9	13.7	0.0
Family Distribution by Income Level	33,014	20.9	18.7	20.4	40.0	0.0
Household Distribution by Income Level	48,178	22.7	16.8	18.5	42.1	0.0
Median Family Income MSA - 17420 Cleveland, TN MSA		\$63,243	Median Hous	ing Value		\$158,546
			Median Gros	s Rent		\$780
	Families Below Poverty Level					

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 14 financial institutions operated 28 branches within the assessment area. Of these institutions, United Community Bank ranked  $10^{\text{th}}$  with a 2.5 percent deposit market share.

Nashville MSA

Demog	raphic Infori	nation of t	he Assessmen	t Area		
	Assessment	Area: Nas	hville MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	372	5.6	24.2	39.5	28.0	2.7
Population by Geography	1,716,226	4.8	22.0	41.3	30.8	1.1
Housing Units by Geography	682,421	5.3	23.2	41.0	29.5	1.0
Owner-Occupied Units by Geography	404,185	2.4	17.8	44.3	35.0	0.6
Occupied Rental Units by Geography	226,552	10.2	32.1	36.2	20.1	1.5
Vacant Units by Geography	51,684	7.4	26.0	36.8	28.0	1.7
Businesses by Geography	204,807	4.2	20.4	31.7	41.1	2.6
Farms by Geography	4,332	2.1	16.4	43.1	37.1	1.2
Family Distribution by Income Level	408,094	20.5	17.5	21.4	40.6	0.0
Household Distribution by Income Level	630,737	22.0	17.2	18.9	41.8	0.0
Median Family Income MSA - 34980 Nashville-Davidson MurfreesboroFranklin, TN MSA		\$83,085	Median Housing Value			\$295,939
			Median Gros	s Rent		\$1,177
Families Below Poverty Level						7.9%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 58 financial institutions operated 496 branches within the assessment area. Of these institutions, United Community Bank ranked 12<sup>th</sup> with a 1.5 percent deposit market share.

**Tennessee Non MSA** 

Demogr	aphic Infor	mation of t	the Assessmen	t Area		
As	sessment A	rea: Tenne	ssee Non MS	4		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	85.7	14.3	0.0
Population by Geography	24,925	0.0	0.0	89.3	10.7	0.0
Housing Units by Geography	10,541	0.0	0.0	93.8	6.2	0.0
Owner-Occupied Units by Geography	7,124	0.0	0.0	94.5	5.5	0.0
Occupied Rental Units by Geography	1,551	0.0	0.0	95.8	4.2	0.0
Vacant Units by Geography	1,866	0.0	0.0	89.6	10.4	0.0
Businesses by Geography	1,374	0.0	0.0	94.0	6.0	0.0
Farms by Geography	97	0.0	0.0	96.9	3.1	0.0
Family Distribution by Income Level	5,830	14.1	22.7	22.0	41.2	0.0
Household Distribution by Income Level	8,675	18.9	14.9	22.3	43.9	0.0
Median Family Income Non-MSAs - TN		\$56,418	Median Hous	Median Housing Value		
			Median Gross	s Rent		\$755
			Families Belo	w Poverty L	Level	9.4%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 4 financial institutions operated 6 branches within the assessment area. Of these institutions, United Community Bank ranked 1<sup>st</sup> with a 41.1 percent deposit market share.

**FLORIDA** 

### Jacksonville MSA

Demog	raphic Inform	mation of t	he Assessmen	t Area		
1	Assessment A	Area: Jacks	onville MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	270	8.1	27.8	33.3	28.5	2.2
Population by Geography	1,268,992	6.2	27.2	35.6	30.3	0.7
Housing Units by Geography	524,576	6.8	27.9	34.6	29.9	0.7
Owner-Occupied Units by Geography	285,481	4.3	21.6	36.0	37.6	0.5
Occupied Rental Units by Geography	175,476	10.0	38.0	33.0	17.9	1.1
Vacant Units by Geography	63,619	9.4	28.3	32.9	29.0	0.5
Businesses by Geography	248,775	5.4	23.2	35.9	33.3	2.1
Farms by Geography	5,501	5.4	25.0	38.6	29.4	1.6
Family Distribution by Income Level	292,608	21.9	18.5	19.2	40.4	0.0
Household Distribution by Income Level	460,957	23.8	17.0	18.6	40.5	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$76,537	Median Hous	ing Value		\$229,982
			Median Gros	s Rent		\$1,134
			Families Belo	ow Poverty I	Level	9.3%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%. (\*) 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, 2023, 31 financial institutions operated 204 branches within the assessment area. Of these institutions, United Community Bank ranked 21<sup>st</sup> with a 0.1 percent deposit market share.

Naples MSA

Demogr	aphic Infor	mation of t	the Assessmen	t Area		
	Assessmen	nt Area: N	aples MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	109	7.3	19.3	40.4	30.3	2.8
Population by Geography	375,752	7.1	21.8	40.2	29.8	1.2
Housing Units by Geography	218,348	3.8	16.3	41.5	37.3	1.2
Owner-Occupied Units by Geography	110,083	2.3	17.4	40.7	38.4	1.2
Occupied Rental Units by Geography	37,894	12.2	23.9	42.1	21.1	0.8
Vacant Units by Geography	70,371	1.6	10.5	42.3	44.2	1.3
Businesses by Geography	94,608	2.6	15.3	41.9	39.2	1.1
Farms by Geography	2,153	7.7	26.3	41.6	23.8	0.7
Family Distribution by Income Level	98,121	21.9	18.0	19.6	40.5	0.0
Household Distribution by Income Level	147,977	23.7	16.8	16.9	42.5	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$84,784	Median Hous	ing Value		\$472,689
			Median Gross	s Rent		\$1,368
			Families Belo	ow Poverty L	evel	7.1%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 35 financial institutions operated 130 branches within the assessment area. Of these institutions, United Community Bank ranked 33<sup>rd</sup> with a 0.1 percent deposit market share.

**Port St Lucie MSA** 

Demogr	aphic Infor	mation of t	he Assessmen	t Area		
Α	ssessment A	Area: Port	St Lucie MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	11.6	27.9	48.8	9.3
Population by Geography	158,431	1.4	10.9	30.6	53.9	3.2
Housing Units by Geography	80,542	1.2	11.0	30.2	55.7	1.8
Owner-Occupied Units by Geography	51,489	0.5	8.2	27.8	61.3	2.2
Occupied Rental Units by Geography	13,381	4.3	24.1	36.5	33.9	1.2
Vacant Units by Geography	15,672	1.0	9.2	32.6	56.1	1.1
Businesses by Geography	38,268	3.3	11.3	27.3	56.6	1.5
Farms by Geography	1,268	3.6	14.4	25.9	50.6	5.5
Family Distribution by Income Level	40,162	15.9	14.3	17.8	52.1	0.0
Household Distribution by Income Level	64,870	21.1	14.6	16.5	47.8	0.0
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$68,546	Median Hous	ing Value		\$294,355
			Median Gros	s Rent		\$1,196
Families Below Poverty Level						

# **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 16 financial institutions operated 41 branches within the assessment area. Of these institutions, United Community Bank ranked 13<sup>th</sup> with a 0.4 percent deposit market share.

Sarasota MSA

Demogr	aphic Infor	mation of t	the Assessmen	t Area		
	Assessmen	t Area: Sai	rasota MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	2.3	22.1	45.6	28.6	1.4
Population by Geography	833,716	2.2	22.3	43.6	31.6	0.2
Housing Units by Geography	439,870	1.8	21.1	45.2	31.8	0.1
Owner-Occupied Units by Geography	255,124	1.2	18.1	46.7	33.8	0.2
Occupied Rental Units by Geography	84,449	3.9	31.6	42.9	21.5	0.1
Vacant Units by Geography	100,297	1.4	19.7	43.4	35.5	0.1
Businesses by Geography	171,572	1.3	15.8	46.3	36.3	0.3
Farms by Geography	4,713	2.0	20.7	45.8	31.1	0.4
Family Distribution by Income Level	216,689	18.8	19.6	20.4	41.2	0.0
Household Distribution by Income Level	339,573	22.0	17.7	18.5	41.8	0.0
Median Family Income MSA - 35840 North Port-Sarasota- Bradenton, FL MSA		\$77,172	Median Hous	ing Value		\$295,896
			Median Gros	s Rent		\$1,304
Families Below Poverty Level						6.1%

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 40 financial institutions operated 231 branches within the assessment area. Of these institutions, United Community Bank ranked 33<sup>rd</sup> with a 0.1 percent deposit market share.

Tampa MSA

Demog	raphic Infor	mation of t	he Assessmen	t Area		
	Assessmen	ıt Area: Ta	mpa MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	610	5.1	22.6	38.0	30.5	3.8
Population by Geography	2,418,869	4.1	22.1	39.0	33.5	1.3
Housing Units by Geography	1,101,512	4.0	21.7	39.7	33.1	1.5
Owner-Occupied Units by Geography	601,454	1.4	18.8	40.4	38.8	0.6
Occupied Rental Units by Geography	351,704	8.2	27.0	39.3	22.9	2.6
Vacant Units by Geography	148,354	4.4	20.6	38.1	34.3	2.6
Businesses by Geography	524,786	3.3	18.8	33.8	41.7	2.3
Farms by Geography	10,177	2.8	22.0	39.8	34.6	0.8
Family Distribution by Income Level	571,567	20.3	17.4	18.9	43.4	0.0
Household Distribution by Income Level	953,158	22.8	16.4	17.2	43.6	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg- Clearwater, FL MSA		\$71,769	Median Hous	ing Value		\$238,160
			Median Gros	s Rent		\$1,203
Families Below Poverty Level					8.9%	

## **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 52 financial institutions operated 497 branches within the assessment area. Of these institutions, United Community Bank ranked 44<sup>th</sup> with a 0.02 percent deposit market share.

**Titusville MSA** 

Demographic Information of the Assessment Area  Assessment Area: Titusville MSA						
Geographies (Census Tracts)	148	3.4	23.0	41.2	27.7	4.7
Population by Geography	606,612	2.6	21.4	45.0	30.5	0.4
Housing Units by Geography	280,648	2.8	21.4	44.7	30.7	0.4
Owner-Occupied Units by Geography	178,469	0.8	18.4	45.6	34.6	0.5
Occupied Rental Units by Geography	57,536	8.0	30.2	40.3	21.2	0.2
Vacant Units by Geography	44,643	3.9	22.0	46.5	27.3	0.3
Businesses by Geography	101,516	2.9	20.3	41.1	35.1	0.5
Farms by Geography	3,108	2.7	23.8	41.3	30.6	1.6
Family Distribution by Income Level	148,934	20.0	18.5	20.2	41.3	0.0
Household Distribution by Income Level	236,005	22.7	16.9	18.9	41.5	0.0
Median Family Income MSA - 37340 Palm Bay-Melbourne- Titusville, FL MSA		\$73,440	Median Housing Value			\$225,108
	•	Median Gross Rent			\$1,121	
Families Below Poverty Level						7.7%

### **Deposit Market Share Information**

According to the FDIC Deposit Market Share data as of June 30, 2023, 17 financial institutions operated 89 branches within the assessment area. Of these institutions, United Community Bank ranked 16<sup>th</sup> with a 0.2 percent deposit market share.

#### **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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**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 nonprofit) 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 <u>financial</u> 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 multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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.