PUBLIC DISCLOSURE

March 23, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Trust Bank
230 Peachtree Street, N.W., Suite 2700
Atlanta, Georgia 30303

RSSD ID NUMBER: 680130

FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470

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

TABLE OF CONTENTS

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

The following table indicates the performance level of Citizens Trust Bank with respect to the Lending and Community Development (CD) tests.

Citizens Trust Bank		
Performance Levels	**Performance Tests***	
	Lending Test	**CD Test**
Outstanding		
Satisfactory	X	X
Needs to Improve		
Substantial Noncompliance		
OVERALL RATING		

*The Lending Test and the CD Test are weighted equally when arriving at an overall rating.

Major factors contributing to this rating include:

- The LTD Ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of loans are made in the AAs.
- The geographic distribution of loans reflects excellent dispersion throughout the AAs.
- The distribution of loans reflects reasonable penetration among businesses of different sizes.
- The bank's CD performance demonstrates adequate responsiveness to the CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of CD opportunities in the AAs.

INSTITUTION

Citizens Trust Bank is a full-service community bank that is wholly owned by Citizens Bancshares Corporation, with offices in Georgia and Alabama. Both the bank and the holding company are headquartered in Atlanta, Georgia. Citizens Trust Bank offers traditional personal and business deposit and loan products, with a primary focus on commercial loans. According to the December 31, 2025 Report of Condition (Call Report), assets totaled $795.5 million, which represents an increase of approximately $50 million (2.7 percent) since the bank's prior CRA performance evaluation conducted in 2023.

Citizens Trust Bank is a Minority Depository Institution (MDI) and certified CDFI. An MDI is a depository institution where a majority of the voting stock is owned by one or more socially and economically disadvantaged individuals. A certified CDFI is a specialized financial institution that works in markets that are underserved by traditional financial institutions. CDFIs share a common goal of expanding economic opportunities in low-income communities by providing access to financial products and services for local residents and businesses. CDFIs strive to foster economic opportunity and revitalize neighborhoods. By financing community businesses, CDFIs spark job growth and retention in hard-to-serve markets across the nation.

Branch Offices

Citizens Trust Bank operates seven full-service branches: five in the Atlanta, GA AA, one in the Birmingham, AL AA, and one in the Eutaw, AL AA. In addition to the ATMs located at all seven branches, the bank operates three stand-alone ATMs in the Atlanta, GA AA; one full-service and two cash-only.

Loan Portfolio

The following table shows the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO		
	12/31/2024	
Loan Type	$ (000s)	Percent
Construction and Development	42,313	10.4%
Secured by One- to Four- Family Dwellings	90,485	22.2%
Other Real Estate: Farmland	0	0.0%
Multifamily	14,999	3.7%
Nonfarm nonresidential	148,791	36.5%
Commercial and Industrial	93,669	23.0%
Loans to Individuals	17,350	4.3%
Agricultural Loans	0	0.0%
Total	*$407,607*	*100.00%*

*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

As of December 31, 2024, nonfarm nonresidential loans made up the largest percent of the loan portfolio at 36.5 percent, followed by commercial and industrial loans at 23.0 percent.

Credit Products

The bank offers the following types of credit products: personal loans (including installment loans, auto loans, secured and unsecured lines of credit, home equity lines of credit, and credit cards), residential mortgages (including conventional, FHA, VA, USDA, and jumbo mortgage loans), and commercial loans (including lines of credit, vehicle/equipment loans, commercial mortgages, SBA loans, and credit cards).

The bank offers a special loan program in its Eutaw, Alabama AA; Community Relief Loans. The product is a small dollar ($500 - $1,550) unsecured loan available to borrowers in immediate need of funds that reside in Greene County, Alabama, which is designated as a persistent poverty county. The product is offered to address a need identified in the Eutaw market for an alternative to payday loans.

For purposes of the CRA, Citizens Trust Bank has defined three AAs across two states:

- Atlanta, GA AA
- Birmingham, AL AA
- Eutaw, AL AA

Citizens Trust Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AAs. The bank received a "Satisfactory" rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta on July 24, 2023 using the Intermediate Small Institution Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined AAs. Citizens Trust Bank's CRA performance evaluation was based on CRA activities within its AAs using the Intermediate Small Institution Examination Procedures. Under these procedures, institutions are evaluated using two separately rated tests: a Lending Test and a CD Test that includes an evaluation of CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities for CD in the AA.

Full-scope reviews were conducted for the Atlanta, GA and Birmingham, AL AAs. When determining the overall rating, the greatest weight was placed on performance in the Atlanta AA due to the majority of branches and lending in this AA.

<u>Lending Test</u>

The Lending Test evaluation includes an analysis of a sample of small business loans originated from January 1, 2024 through December 31, 2024. See *Appendix C – Glossary* for a definition of small business loan.

Lending Test Analysis Comparisons

Lending Test analyses entail comparisons of bank performance to applicable AA demographics. Under the Lending Test, comparisons to 2024 AA demographics are based on 2024 FFIEC Census data. Certain business demographics are based on Dun & Bradstreet (D&B) data applicable to the year of lending activity being considered. Key demographic data used for this analysis are in *Appendix D* (full-scope AAs) and *Appendix F* (limited-scope AA).

<u>CD Test</u>

The examination included CD loans, qualified investments, and CD services from January 1, 2023 through December 31, 2025. The definition of CD as outlined in *Appendix C*.

Community Contacts
As part of the CRA evaluation, two community contacts were conducted with individuals specializing in economic development who are familiar with economic and demographic characteristics, as well as CD opportunities in the bank's AA. Information obtained from the contacts was used to establish context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable sections of the evaluation for each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview
The rating for the Lending Test is Satisfactory. The LTD ratio is reasonable and a majority of loans were made in the AA. The geographic distribution of loans reflects excellent dispersion throughout the AAs. The distribution of loans reflects reasonable penetration among businesses of different sizes. Performance context information such as demographics, economic conditions, competition, business strategy, and lending opportunities was considered in evaluating lending performance.

The analysis included a sample of 43 small business loans reported by the bank in the AAs during the review period. Details for small business lending can be found in *Appendix E (full-scope)* and *Appendix G (limited-scope)*.

Loan-to-Deposit Ratio
The LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs. The average LTD for the 12 quarters from March 31, 2023 to December 31, 2025 was 57.7 percent. The LTD ratio was compared to four other depository institutions with branches in the AA over the same period ranging from 44.5 to 93.1 percent. The LTD ratio at the previous examination was 58.3 percent.

AA Concentration
The bank originated a majority of loans to businesses in the AA. The table below shows, by product type, the number and percentage of loans that were made inside and outside of the AA.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Small Business	43	55.1	$10,100	52.2	35	44.9	$9,259	47.8
Total Small Bus. related	**43**	**55.1**	**$10,100**	**52.2**	**35**	**44.9**	**$9,259**	**47.8**
TOTAL LOANS	**43**	**55.1**	**$10,100**	**52.2**	**35**	**44.9**	**$9,259**	**47.8**

Note: Affiliate loans not included

As indicated in the table above, 55.1 percent of small business loans (by number) and 52.2 percent (by dollar) were made to businesses within the AA. This indicates the bank's willingness to originate loans that meet the credit needs of its AA.

Distribution of Lending by Geography and by Business Size

The geographic distribution of small business loans reflects excellent dispersion throughout the AAs. The distribution of loans reflects reasonable penetration among businesses of different sizes. The analysis of small business lending for each AA is discussed in detail later in this report.

Responsiveness to Substantiated Complaints

Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

CD TEST

The rating for the CD Test is Satisfactory. CD performance demonstrates adequate responsiveness to the needs of the AAs through CD loans, qualified investments, and CD services considering the bank's capacity and needs and availability of opportunities for CD in the AA.

Citizens Trust Bank originated nine CD loans totaling $17.9 million; two loans for $7.0 million financed affordable housing development, two loans for $5.6 million were provided to organizations that offer community services to LMI individuals, and five loans for $5.3 million were provided to organizations that support the creation and sustainability of small businesses.

Qualified investments totaled $4.9 million; one investment for $4 million supported an organization that offers services to LMI individuals; one investment totaling $550,000 supported affordable housing, and two investments for $328,130 promoted economic development. Management further demonstrated its commitment to community reinvestment with 16 donations totaling $39,100 targeted to LMI populations.

Employees engaged in 139 CD service activities totaling 656 hours benefiting the bank's AAs. Activities targeting LMI individuals included personal finance management education, affordable housing development, and other community and economic development services.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE – GEORGIA

CRA RATING FOR GEORGIA: Satisfactory
The Lending Test is rated: Satisfactory
The CD Test is rated: Satisfactory

Major factors supporting the institution's rating in Georgia include the following:

- The geographic distribution of loans reflects excellent dispersion throughout the Georgia AA.
- The distribution of lending reflects reasonable penetration among businesses of different sizes.
- The bank demonstrates adequate responsiveness to CD needs in its Georgia AA through CD loans, qualified investments or contributions, and CD services, considering its capacity and the availability of CD opportunities.

SCOPE OF EXAMINATION
Citizens Trust Bank has one AA in Georgia; the Atlanta AA. The Atlanta AA was evaluated using full-scope examination procedures. The time periods covered and the loan products reviewed were the same as those discussed in the *Institution/Scope of Examination* section. One community contact interview was conducted to better understand community credit needs, opportunities, and local economic conditions.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA AA

Overview
Citizens Trust Bank operates five of its seven branch offices in the Atlanta AA. The AA has not changed since the previous examination and consists of Clayton, DeKalb, Fayette, Fulton, Gwinnett, Henry, and Rockdale counties, which are seven of the 29 counties that comprise the Atlanta-Sandy Springs-Alpharetta, Georgia MSA.

As of June 30, 2024, the bank had $563,594 in deposits in the AA, accounting for 85.2 percent of its total deposits. Overall, 74.4 percent of the total sample of small business loans reviewed were originated in the AA.

Population and Income Characteristics
The AA population is estimated to be 3,539,225, representing a 9.4 percent increase from the 2015 census. Of the seven counties in the AA, Fulton, Gwinnett, and DeKalb contain the most residents, with Fulton County being the most populous county in the state.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income (MFI) for the relevant area. As the following table shows, the 2024 estimated MFI was $100,900.

Borrower Income Levels
Atlanta-Sandy Springs-Roswell, GA MD

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2024	**$100,900**	0 - $50,449	$50,450 - $80,719	$80,720 - $121,079	$121,080 - & above

There are 797,443 families in the AA; 22.4 percent are low-income, 16.5 percent are moderate-income, 18.7 percent are middle-income, and 42.4 percent are upper-income. Of the total families, 9.3 percent had incomes below the poverty level.

Economic Conditions

The metro Atlanta business community includes companies across several industries; healthcare, banking, supply chain infrastructure, and technology. Specifically, Delta Airlines, Northside Hospital, Piedmont Healthcare, Publix Super Markets, Wellstar Health System, The Home Depot, and United Parcel Service (UPS) are among the top employers in the region.[1] Within the AA, Fulton, Gwinnett, and DeKalb counties are the largest employment centers. Small businesses are vital to the metro Atlanta economy. There are 203,713 businesses in the AA, 93.6 percent of which had total annual revenues of $1 million or less and were therefore considered to be small businesses.

The following table shows the unemployment rates percentages for the AA, the counties that comprise the AA, the MSA, and the state of Georgia. As shown, unemployment rates across the AA are generally higher than the state.

GA Atlanta 2024 Unemployment Rates					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
GA Atlanta 2024	7.5%	4.3%	3.2%	3.4%	3.6%
Clayton County, GA	10.0%	6.2%	4.0%	4.1%	4.4%
DeKalb County, GA	8.0%	4.7%	3.3%	3.5%	3.7%
Fayette County, GA	5.7%	3.1%	2.9%	3.2%	3.3%
Fulton County, GA	7.8%	4.5%	3.2%	3.4%	3.6%
Gwinnett County, GA	6.4%	3.5%	2.8%	3.0%	3.2%
Henry County, GA	7.2%	4.1%	3.2%	3.5%	3.8%
Rockdale County, GA	7.5%	4.6%	3.6%	3.8%	4.2%
Atlanta-Sandy Springs-Roswell, GA MD	7.1%	4.1%	3.1%	3.3%	3.5%
Georgia	6.5%	3.9%	3.2%	3.3%	3.5%
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics					

Housing Characteristics

There are 1.4 million housing units in the AA, of which 54.0 percent are owner-occupied, 37.6 percent are rental units, and 8.4 percent are vacant. In low-income tracts, 23.2 percent of housing units are owner-occupied and 62.4 percent are rentals, whereas 42.3 percent of housing units in moderate-income tracts are owner-occupied and 48.0 percent are rentals. The median age of the housing stock across the AA is 38 years, although housing units in LMI census tracts in the AA are older with a median age of 47 years in low-income tracts and 42 years in moderate-income tracts.

The median housing value in the AA is $238,443, which is higher than the median housing value for both the state of Georgia at $190,200 and the Atlanta MSA at $228,890. The median housing value is highest in Fulton County ($326,700) and lowest in Clayton County ($122,100). Median gross rent in the AA is $1,232 per month, which is higher than the median gross rent for the state of Georgia ($1,042 per month) and the Atlanta MSA ($1,199). These elevated housing costs contribute to an increased affordability gap within the AA. Data shows that the percentage of renters in the AA with rent costs greater than 30 percent of income is 48.3 percent, which

[1] "Major Employers." Metro Atlanta Chamber, https://www.metroatlantachamber.com/2025 Top Employers Survey.xlsx Accessed 16 March 2026.

is higher than the state of Georgia at 45.3 percent. These data indicate that housing in the AA is less affordable than housing across the state of Georgia.

Credit and CD Needs
Information was obtained from an individual familiar with the AA and CD activities to help better understand local CD and economic conditions. The contact stated that the business community is optimistic about the growth potential of the area, however support activities have slowed due to economic uncertainty. Small businesses in LMI neighborhoods face barriers when trying to secure traditional commercial funding. The contact mentioned that mainstream credit underwriting standards often exclude minority-owned and diverse small businesses due to strict collateral requirements and historical lending disparities. Entrepreneurs are in need of alternative, low-interest, and risk tolerant capital options. Small businesses also are in need of flexible credit lines to fund operational expenses, retain workers, and to scale technology infrastructure.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST
The geographic distribution of loans reflects excellent penetration throughout the AA and the distribution of loans reflects reasonable penetration among businesses of different revenue sizes.

The analysis included a sample of 32 small business loans reported in the AA during the review period. Details of the bank's small business lending can be found in *Appendix E.*

Geographic Distribution of Loans
The geographic distribution of loans reflects excellent penetration throughout the AA. For this analysis, the geographic distribution of small business loans was compared to available demographic information. Performance context issues were also taken into consideration.

Small business lending in low-income tracts is excellent. Small business lending in low-income tracts (18.8) was above the percentage of total businesses located in these tracts (6.6 percent). Small business lending in moderate-income tracts is excellent. Small business lending in moderate-income tracts (28.1 percent) was above the percentage of total businesses located in these tracts (21.9 percent).

Lending to Businesses of Different Sizes
The distribution of loans reflects reasonable penetration to businesses of different sizes. Small business lending to businesses with gross annual revenues of $1 million or less (62.5 percent) was below the percentage of total businesses in the AA (93.6 percent). Additionally, 21 of 32 total originations (65.7 percent) were in amounts of $250,000 or less, which indicates the bank's willingness to make small dollar loans that are responsive to the credit needs of the small business community as identified by the community contact.

CD TEST
CD performance demonstrates adequate responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services considering the bank's capacity and needs and availability of opportunities in the AA.

Examples of responsive CD activities include:

- A $4.8 million loan to a supportive living complex that provides short-term housing and living resources to underserved populations.

- A loan totaling $550,000 for the construction of apartments in the AA using low-income housing tax credits (LIHTCs). The project will create 256 new units of affordable housing for LMI individuals and families.
- A $10,000 donation to a local nonprofit organization that provides economic empowerment and business development opportunities for small businesses throughout the metropolitan Atlanta area.
- Staff are involved in the Financial Independence Training (F.I.T.) Program, which was implemented to focus on CD and financial empowerment. This initiative serves multiple communities within the bank's AA, with a particular emphasis on schools and faith-based organizations in LMI areas.

ALABAMA

CRA RATING FOR ALABAMA: Satisfactory
The Lending Test is rated: Satisfactory
The CD Test is rated: Satisfactory

Major factors supporting the institution's rating in Alabama include the following:

- The geographic distribution of loans reflects excellent dispersion throughout the Alabama AAs.
- The distribution of lending reflects reasonable penetration among businesses of different sizes throughout the Alabama AAs.
- The bank demonstrates adequate responsiveness to CD needs in its Alabama AAs through CD loans, qualified investments and CD services, considering the bank's capacity and the availability of CD opportunities.

SCOPE OF EXAMINATION

Citizens Trust Bank has two AAs in Alabama: Birmingham and Eutaw. The Birmingham AA was evaluated using full-scope examination procedures and the Eutaw AA was evaluated using limited-scope procedures. The time periods covered and the loan products reviewed were the same as those discussed in the *Institution/Scope of Examination* section. One community contact interview was conducted to ascertain specific community credit needs, opportunities, and local economic conditions.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

Citizens Trust Bank operates two of its seven branch offices in Alabama. As of June 30, 2024, the bank had $98,080 in deposits in Alabama, accounting for 14.8 percent of its total deposits. Overall, 25.6 percent of the total sample of small business loans reviewed were originated in Alabama AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The Lending Test rating for Alabama is Satisfactory. The geographic distribution of small business loans reflects excellent dispersion throughout the AAs. The distribution of loans reflects reasonable penetration among businesses of different sizes.

CD TEST

The CD Test rating for Alabama is Satisfactory. The bank's CD performance demonstrates adequate responsiveness to CD needs of its AA through CD loans, qualified investments, and CD services considering the its capacity and the need and availability of opportunities in the AA.

Additional details surrounding CD activities can be found in the *CD Test* section of the Birmingham AA.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM AA

Overview

The Birmingham AA consists of Jefferson and Shelby counties, which are two of the six counties that comprise the Birmingham-Hoover, Alabama MSA. The bank operates one branch with an ATM in the AA.

Population and Income Characteristics

The population of the AA is 897,745. Jefferson County contains three-fourths of the AA population and is Alabama's most populous county. According to the U.S Census Bureau, between 2015 and 2020, Shelby County experienced population growth of 9.6 percent, exceeding the state's growth rate of 4.0 percent. Population growth was lower in Jefferson County at 2.4 percent.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated MFI for the relevant area. The table also provides a range of the estimated MFI for each income category (low, moderate, middle, and upper). As shown, the 2024 estimated MFI income was $90,900.

Borrower Income Levels
Birmingham, AL MSA

FFIEC Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2024	**$90,900**	0	-	$45,449	$45,450	-	$72,719	$72,720	-	$109,079	$109,080	-	& above

There are 220,596 families in the AA; 21.0 percent are low-income, 16.1 percent are moderate-income, 18.2 percent are middle-income, and 44.7 percent are upper-income. Of the total families, 9.4 percent have incomes below the poverty level.

Economic Conditions

Top industries in Birmingham include education, banking, supply chain infrastructure, and healthcare. The University of Alabama at Birmingham, Regions Bank, Walmart, Mercedes Benz, and The Children's Hospital of Alabama are among the top employers in the region.[2] Within the AA, Jefferson County is the largest employment center with small businesses being vital to the economy. According to 2024 D&B information, there are 40,291 businesses in the AA, 91.7 percent of which had total annual revenues of $1 million or less and were therefore considered small businesses.

The following table shows the unemployment rates for the AA, the counties that comprise the AA, the MSA, and the state of Alabama. As shown, unemployment in the AA is similar to the state. Shelby County consistently experienced lower unemployment than the state.

[2] "Major Employers." Birmingham Alabama, https://www.bizjournals.com/birmingham/subscriber-only/2025/10/16/largest-employers.html Accessed 16 March 2026.

AL Birmingham 2024 Unemployment Rates					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
AL Birmingham 2024	6.1%	3.2%	2.3%	2.3%	2.9%
Jefferson County, AL	6.8%	3.6%	2.5%	2.5%	3.1%
Shelby County, AL	4.3%	2.1%	1.8%	1.8%	2.4%
Birmingham, AL MSA	6.0%	3.1%	2.3%	2.3%	2.9%
Alabama	6.4%	3.3%	2.5%	2.5%	3.1%
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics					

Housing Characteristics
There are 396,915 housing units in the AA, of which 58.4 percent are owner-occupied, 28.4 percent are rental units, and 13.2 percent are vacant. In low-income tracts, 29.2 percent of housing units are owner-occupied and 46.2 percent are rentals, whereas 45.5 percent of housing units in moderate-income tracts are owner-occupied and 36.7 percent are rentals. The median age of the housing stock across the AA is 46 years, although housing units in LMI census tracts in the AA are older, with a median age of 61 years in low-income tracts and 59 years in moderate-income tracts.

The median housing value in the AA is $182,170, which is higher than the median housing value for both the state of Alabama at $149,600 and the Birmingham MSA at $167,925. The median housing value is highest in Shelby County ($220,700) and lower in Jefferson County ($165,000). Median gross rent in the AA is $956 per month, which is higher than the median gross rent for the state of Alabama ($811 per month) and the Birmingham MSA ($916). These elevated housing costs contribute to an increased affordability gap within the AA. Data shows that the percentage of renters with rent costs greater than 30 percent of income is 43.8 percent, which is higher than the state of Alabama at 40.8 percent. Housing data suggests that housing in the AA is less affordable than the state of Alabama.

Credit and CD Needs
Information was obtained from an individual specializing in economic development for the area. The contact stated that overall economic conditions are stable. The contact noted that the community is optimistic about the potential growth of the area, and that there are various opportunities in the area for financial institutions to be a catalyst to local CD needs. The contact discussed that the surrounding LMI neighborhoods continue to face barriers to development, including limited connectivity and deteriorating public support services. Credit needs are centered on providing essential community infrastructure financing to commercial customers. This can include flexible working capital loans to support business objectives and to retain adequate workforce support. Additionally, increasing the supply of affordable housing for a large segment of the Birmingham workforce is a concern in the region. The city's 2025–2029 Consolidated Plan[3] indicates that housing affordability is a pervasive challenge as creating and preserving affordable housing is a key objective of the plan. Proposed activities include the acquisition and rehabilitation of housing units, new construction of multi-family housing, and single-family housing improvement programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST
The geographic distribution of loans reflects excellent penetration throughout the AA and the distribution of loans reflects reasonable penetration among businesses of different revenue sizes.

[3] Birmingham Watch- Birmingham Releases 5-Year Plan for Spending Federal Housing, Community Development Dollars - BirminghamWatch.Birminghamwatch.org. Accessed 3/16/26.

The analysis included nine small business loans reported by the bank in the AA during the review period. Details of the bank's small business lending can be found below and in *Appendix E.*

Geographic Distribution of Loans
The geographic distribution of loans reflects excellent penetration throughout the AA. For this analysis, the geographic distribution of small business loans was compared to available demographic information. Performance context was also taken into consideration.

Small business lending in low-income tracts is excellent. Small business lending in low-income tracts (33.3 percent) is above the percentage of total businesses located in these tracts (6.8 percent). Small business lending in moderate-income tracts is reasonable. Small business lending in moderate-income tracts (11.1 percent) is below the percentage of total businesses located in these tracts (16.6 percent).

Lending to Businesses of Different Sizes
The distribution of loans reflects reasonable penetration among businesses of different sizes. Small business lending to businesses with gross annual revenues of $1 million or less (55.6 percent) is below the percentage of total businesses in the AA (91.7 percent). Eight of nine total originations (88.8 percent) were in amounts of $250,000 or less, which is an indicator of the bank's willingness to make the small dollar loans to help meet the credit needs of the business community and responsive to a credit need identified by the community contact.

CD TEST
CD performance demonstrates adequate responsiveness to the CD needs of the AA through CD loans, qualified investments, and CD services considering its capacity and needs and availability of opportunities in the AA.

Examples of responsive CD activities include:

- A $1 million loan to support a 20-unit affordable housing complex in a low-income tract.

- Bank employees are involved in the F.I.T. Program, a financial education program targeted to schools and faith-based organizations in LMI geographies.

METROPOLITAN AREA(S)
LIMITED-SCOPE REVIEW

The Eutaw AA was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. Refer to the tables in *Appendices G and H* for additional information regarding the AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN EUTAW AA

The Eutaw AA consists of Greene County, Alabama, which is part of the Tuscaloosa, Alabama MSA. The bank operates one branch with an ATM in the AA. According to the FDIC Deposit Market Share Report as of June 30, 2024, the bank had total deposits of $17,506, representing market share of 16.2 percent. One other bank operates in the AA: Merchants & Farmers Bank of Greene County, which had a deposit market share of 83.8 percent.

According to 2024 FFIEC census data, the AA consists of one low-income census tract and three moderate-income tracts. There are 1,565 families in the AA, of which 45.0 percent are low-income, 18.8 percent are moderate-income, 13.3 percent are middle-income, and 22.9 percent are upper income. Of these families, 31.8 percent live below the poverty level. Greene County has been designated as a persistent poverty county, meaning that 20.0 percent or more of the population has been living in poverty over the past 30 years. Fewer than half of the housing units in the AA (42.5 percent) are owner-occupied, and a large proportion (38.1 percent) of housing units are vacant.

The bank offers small dollar Community Relief Loans in the AA, which is an unsecured loan product available to borrowers in immediate need of funds who reside in Greene County, Alabama.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS

The following table compares conclusions regarding the bank's performance in the Eutaw to overall performance.

Performance in the Limited-Scope Review Metropolitan Assessment Areas		
Assessment Area	**Lending Test**	**Community Development Test**
Eutaw, Alabama	Consistent	Not Consistent (Below)

The performance standards of the Lending Test for limited-scope areas includes geographic and borrower distribution. The geographic distribution of loans reflects reasonable dispersion throughout the AA and the distribution of loans reflects reasonable penetration among businesses of different revenue sizes.

The CD Test for limited-scope areas includes qualifying amounts for CD loans, investments, and services. The bank originated no CD loans, investments or services in the AA during the review period. Performance in the limited-scope AA did not impact overall performance for the state.

APPENDIX A – SCOPE OF EXAMINATION

TIME PERIOD REVIEWED			
January 1, 2024 to December 31, 2024 - Lending Test January 1, 2023 to December 31, 2025 - CD Test			
FINANCIAL INSTITUTION		**PRODUCTS REVIEWED**	
Citizens Trust Bank, Atlanta, Georgia		Small Business Loans	
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**	**PRODUCTS REVIEWED**	
NA	NA	NA	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREAS	***TYPEOF EXAMINATION***	***BRANCHES VISITED***	***OTHER INFORMATION***
Atlanta, Georgia	*Full-scope*	*None*	*None*
Birmingham, Alabama	*Full-scope*	*None*	*None*
Eutaw, Alabama	*Limited-scope*	*None*	*None*

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention
Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

General Information
The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Citizens Trust Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **March 23, 2026**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of MSAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

I. Low-or moderate-income geographies;
II. Designated disaster areas; or
III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
    a. Rates of poverty, unemployment, and population loss; or
    b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

APPENDIX C – GLOSSARY (Continued)

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 MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Metropolitan area (MA): A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

APPENDIX C – GLOSSARY (Continued)

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

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

Rated area: A rated area is a state or multistate MA. 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 MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

APPENDIX D – FULL SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	85	9.2%	57,061	7.2%	15,742	27.6%	178,790	22.4%
Moderate-income	213	23.0%	182,246	22.9%	26,679	14.6%	131,620	16.5%
Middle-income	246	26.5%	237,603	29.8%	18,188	7.7%	148,898	18.7%
Upper-income	334	36.0%	303,280	38.0%	9,967	3.3%	338,135	42.4%
Unknown-income	49	5.3%	17,253	2.2%	3,830	22.2%	0	0.0%
Total Assessment Area	**927**	**100.0%**	**797,443**	**100.0%**	**74,406**	**9.3%**	**797,443**	**100.0%**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	122,992	28,499	3.8%	23.2%	76,790	62.4%	17,703	14.4%
Moderate-income	326,457	138,191	18.6%	42.3%	156,613	48.0%	31,653	9.7%
Middle-income	369,057	226,523	30.6%	61.4%	119,713	32.4%	22,821	6.2%
Upper-income	500,133	333,056	44.9%	66.6%	131,309	26.3%	35,768	7.2%
Unknown-income	54,162	15,167	2.0%	28.0%	32,287	59.6%	6,708	12.4%
Total Assessment Area	**1,372,801**	**741,436**	**100.0%**	**54.0%**	**516,712**	**37.6%**	**114,653**	**8.4%**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	13,434	6.6%	12,552	6.6%	773	6.9%	109	6.0%
Moderate-income	44,519	21.9%	42,009	22.0%	2,168	19.4%	342	18.8%
Middle-income	53,739	26.4%	51,151	26.8%	2,177	19.5%	411	22.5%
Upper-income	84,425	41.4%	78,092	40.9%	5,462	49.0%	871	47.8%
Unknown-income	7,596	3.7%	6,938	3.6%	568	5.1%	90	4.9%
Total Assessment Area	**203,713**	**100.0%**	**190,742**	**100.0%**	**11,148**	**100.0%**	**1,823**	**100.0%**
	Percentage of Total Businesses:			**93.6%**		**5.5%**		**0.9%**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	33	4.6%	33	4.7%	0	0.0%	0	0.0%
Moderate-income	123	17.0%	119	16.8%	4	25.0%	0	0.0%
Middle-income	189	26.1%	185	26.1%	4	25.0%	0	0.0%
Upper-income	354	48.8%	349	49.2%	5	31.3%	0	0.0%
Unknown-income	26	3.6%	23	3.2%	3	18.8%	0	0.0%
Total Assessment Area	**725**	**100.0%**	**709**	**100.0%**	**16**	**100.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**97.8%**		**2.2%**		**0.0%**

Based on 2024 FFIEC Census Data and 2024 D&B Information

Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	24	9.8%	13,729	6.2%	4,405	32.1%	46,317	21.0%
Moderate-income	58	23.8%	44,292	20.1%	7,839	17.7%	35,620	16.1%
Middle-income	74	30.3%	68,861	31.2%	4,741	6.9%	40,050	18.2%
Upper-income	81	33.2%	91,686	41.6%	3,035	3.3%	98,609	44.7%
Unknown-income	7	2.9%	2,028	0.9%	714	35.2%	0	0.0%
Total Assessment Area	**244**	**100.0%**	**220,596**	**100.0%**	**20,734**	**9.4%**	**220,596**	**100.0%**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	35,907	10,477	4.5%	29.2%	16,577	46.2%	8,853	24.7%
Moderate-income	91,620	41,660	18.0%	45.5%	33,635	36.7%	16,325	17.8%
Middle-income	120,563	75,140	32.4%	62.3%	31,754	26.3%	13,669	11.3%
Upper-income	143,073	102,573	44.3%	71.7%	28,009	19.6%	12,491	8.7%
Unknown-income	5,752	1,905	0.8%	33.1%	2,827	49.1%	1,020	17.7%
Total Assessment Area	**396,915**	**231,755**	**100.0%**	**58.4%**	**112,802**	**28.4%**	**52,358**	**13.2%**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,736	6.8%	2,472	6.7%	254	8.6%	10	2.6%
Moderate-income	6,685	16.6%	6,194	16.8%	431	14.5%	60	15.7%
Middle-income	11,933	29.6%	10,866	29.4%	950	32.0%	117	30.5%
Upper-income	18,572	46.1%	17,075	46.2%	1,304	43.9%	193	50.4%
Unknown-income	365	0.9%	331	0.9%	31	1.0%	3	0.8%
Total Assessment Area	**40,291**	**100.0%**	**36,938**	**100.0%**	**2,970**	**100.0%**	**383**	**100.0%**
	Percentage of Total Businesses:			**91.7%**		**7.4%**		**1.0%**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6	2.4%	6	2.5%	0	0.0%	0	0.0%
Moderate-income	16	6.3%	15	6.2%	1	8.3%	0	0.0%
Middle-income	105	41.3%	100	41.3%	5	41.7%	0	0.0%
Upper-income	126	49.6%	120	49.6%	6	50.0%	0	0.0%
Unknown-income	1	0.4%	1	0.4%	0	0.0%	0	0.0%
Total Assessment Area	**254**	**100.0%**	**242**	**100.0%**	**12**	**100.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**95.3%**		**4.7%**		**0.0%**

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX E – FULL SCOPE LENDING TABLES

Geographic Distribution of Small Business Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
SMALL BUSINESSES	Low	6	18.8%	966	11.6%	6.6%
	Moderate	9	28.1%	4,245	50.9%	21.9%
	Middle	12	37.5%	2,529	30.3%	26.4%
	Upper	5	15.6%	599	7.2%	41.4%
	Unknown	0	0.0%	0	0.0%	3.7%
	Total	*32*	*100%*	*8,339*	*100%*	*100.0%*

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

Small Business Loans by Business Revenue & Loan Size

Assessment Area: GA Atlanta

		Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
Revenue	$1 Million or Less	20	62.5%	4,215	50.5%	93.6%
	Over $1 Million	8	25.0%	3,351	40.2%	5.5%
	Total Rev. available	28	87.5%	7,566	90.7%	99.1%
	Rev. Not Known	4	12.5%	773	9.3%	0.9%
	Total	*32*	*100%*	*8,339*	*100%*	*100%*
Loan Size	$100,000 or Less	18	56.3%	647	7.8%	
	$100,001 - $250,000	3	9.4%	555	6.7%	
	$250,001 - $1 Million	11	34.4%	7,136	85.6%	
	Total	*32*	*100%*	*8,339*	*100%*	
Loan Size & Rev $1 Mill or Less	$100,000 or Less	12	60.0%	424	10.1%	
	$100,001 - $250,000	2	10.0%	381	9.0%	
	$250,001 - $1 Million	6	30.0%	3,410	80.9%	
	Total	*20*	*100%*	*4,215*	*100%*	

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

Geographic Distribution of Small Business Loans

Assessment Area: AL Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
SMALL BUSINESSES	Low	3	33.3%	556	36.7%	6.8%
	Moderate	1	11.1%	536	35.4%	16.6%
	Middle	3	33.3%	277	18.3%	29.6%
	Upper	1	11.1%	47	3.1%	46.1%
	Unknown	1	11.1%	100	6.6%	0.9%
	Total	*9*	*100%*	*1,515*	*100%*	*100.0%*

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Birmingham

		Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
Revenue	$1 Million or Less	5	55.6%	682	45.0%	91.7%
	Over $1 Million	2	22.2%	636	42.0%	7.4%
	Total Rev. available	7	77.8%	1,318	87.0%	99.0%
	Rev. Not Known	2	22.2%	197	13.0%	1.0%
	Total	*9*	*100%*	*1,515*	*100%*	*100%*
Loan Size	$100,000 or Less	4	44.4%	208	13.7%	
	$100,001 - $250,000	4	44.4%	771	50.9%	
	$250,001 - $1 Million	1	11.1%	536	35.4%	
	Total	*9*	*100%*	*1,515*	*100%*	
Loan Size & Rev $1 Mill or Less	$100,000 or Less	2	40.0%	62	9.1%	
	$100,001 - $250,000	3	60.0%	621	91.1%	
	$250,001 - $1 Million	0	0.0%	0	0.0%	
	Total	*5*	*100%*	*682*	*100%*	

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

APPENDIX F – LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: AL Eutaw

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	25.0%	473	30.2%	234	49.5%	705	45.0%
Moderate-income	3	75.0%	1,092	69.8%	264	24.2%	294	18.8%
Middle-income	0	0.0%	0	0.0%	0	0.0%	208	13.3%
Upper-income	0	0.0%	0	0.0%	0	0.0%	358	22.9%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**4**	**100.0%**	**1,565**	**100.0%**	**498**	**31.8%**	**1,565**	**100.0%**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,221	639	29.3%	52.3%	114	9.3%	468	38.3%
Moderate-income	3,910	1,540	70.7%	39.4%	885	22.6%	1,485	38.0%
Middle-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**5,131**	**2,179**	**100.0%**	**42.5%**	**999**	**19.5%**	**1,953**	**38.1%**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	38	13.7%	34	13.8%	1	7.1%	3	17.6%
Moderate-income	239	86.3%	212	86.2%	13	92.9%	14	82.4%
Middle-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**277**	**100.0%**	**246**	**100.0%**	**14**	**100.0%**	**17**	**100.0%**
	Percentage of Total Businesses:			**88.8%**		**5.1%**		**6.1%**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	8.0%	2	8.7%	0	0.0%	0	0.0%
Moderate-income	23	92.0%	21	91.3%	1	100.0%	1	100.0%
Middle-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**25**	**100.0%**	**23**	**100.0%**	**1**	**100.0%**	**1**	**100.0%**
	Percentage of Total Farms:			**92.0%**		**4.0%**		**4.0%**

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX G – LIMITED SCOPE LENDING TABLES

Geographic Distribution of Small Business Loans

Assessment Area: AL Eutaw

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	13.7%
	Moderate	2	100.0%	246	100.0%	86.3%
	Middle	0	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%
	Total	*2*	*100%*	*246*	*100%*	*100.0%*

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Eutaw

		Bank Lending & Demographic Data 2024				
		Count		Dollar		Total Businesses
		#	%	$ (000s)	$ %	%
Revenue	$1 Million or Less	1	50.0%	10	4.1%	88.8%
	Over $1 Million	0	0.0%	0	0.0%	5.1%
	Total Rev. available	1	50.0%	10	4.1%	93.9%
	Rev. Not Known	1	50.0%	236	95.9%	6.1%
	Total	*2*	*100%*	*246*	*100%*	*100%*
Loan Size	$100,000 or Less	1	50.0%	10	4.1%	
	$100,001 - $250,000	1	50.0%	236	95.9%	
	$250,001 - $1 Million	0	0.0%	0	0.0%	
	Total	*2*	*100%*	*246*	*100%*	
Loan Size & Rev $1 Mill or Less	$100,000 or Less	1	100.0%	10	100.0%	
	$100,001 - $250,000	0	0.0%	0	0.0%	
	$250,001 - $1 Million	0	0.0%	0	0.0%	
	Total	*1*	*100%*	*10*	*100%*	

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding