

**PUBLIC DISCLOSURE**

**July 14, 2025**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**Bank Independent  
710 South Montgomery Avenue  
Sheffield, Alabama 35660**

**RSSD ID NUMBER: 539032**

**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.

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**INSTITUTION'S CRA RATING**

**INSTITUTION'S CRA RATING:** This institution is rated **SATISFACTORY**.

The following table indicates the performance level of Bank Independent with respect to the Lending, Investment, and Service Tests.

Bank Independent			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			
<b>OVERALL RATING</b>	<b>SATISFACTORY</b>		

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

**Major factors contributing to this rating include:**

- The geographic distribution of loans reflects good penetration throughout the bank's assessment areas (AAs).
- The distribution of borrowers reflects adequate penetration among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making community development (CD) loans.
- The bank makes an adequate level of qualified CD investments and grants.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in its AAs.
- The bank provides a relatively high level of CD services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION

Bank Independent is a community bank headquartered in Sheffield, Alabama with assets of \$2.8 billion as of December 31, 2024. Bank Independent is wholly-owned by Bank Independent, Inc., a bank holding company also headquartered in Sheffield, Alabama. Bank Independent is an intrastate bank operating 34 branches as of December 31, 2024, all in the state of Alabama.

The majority of the bank's lending activity occurs in two full-scope AAs, with Florence-Muscle Shoals contributing 55.2 percent of combined HMDA-reportable and small business lending volume by number, followed by Huntsville with 26.6 percent.

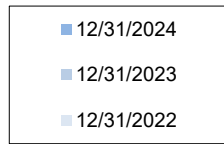
Since the previous exam, the bank has opened six branches and closed two branches. The two closures, as well as two of the openings, were associated with relocations.

### Loan Portfolio

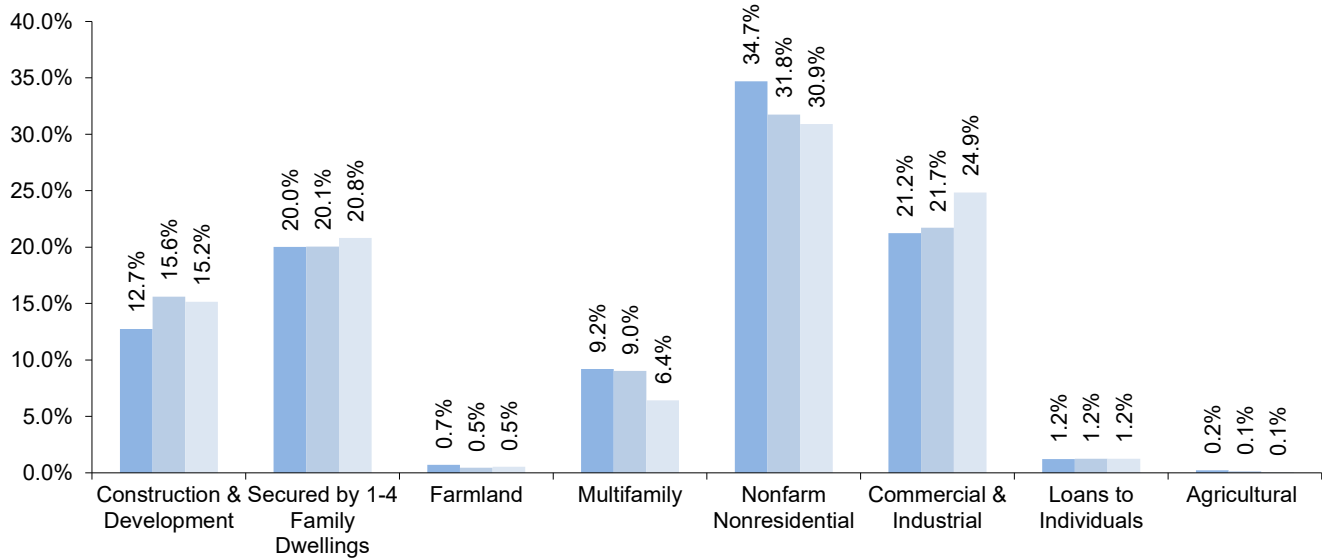
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO							
Loan Type	12/31/2024		12/31/2023		12/31/2022		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	234,438	12.7%	275,588	15.6%	244,994	15.2%	-4.3%
Secured by One- to Four- Family Dwellings	368,536	20.0%	354,191	20.1%	336,661	20.8%	9.5%
Other Real Estate: Farmland	12,899	0.7%	7,957	0.5%	8,625	0.5%	49.6%
Multifamily	169,429	9.2%	159,487	9.0%	103,940	6.4%	63.0%
Nonfarm nonresidential	638,762	34.7%	560,580	31.8%	499,691	30.9%	27.8%
Commercial and Industrial	391,253	21.2%	383,588	21.7%	401,846	24.9%	-2.6%
Loans to Individuals	22,128	1.2%	22,007	1.2%	20,207	1.2%	9.5%
Agricultural Loans	3,964	0.2%	2,170	0.1%	894	0.1%	343.4%
<b>Total</b>	<b>\$1,841,409</b>	<b>100.00%</b>	<b>\$1,765,568</b>	<b>100.00%</b>	<b>\$1,616,858</b>	<b>100.00%</b>	<b>13.9%</b>

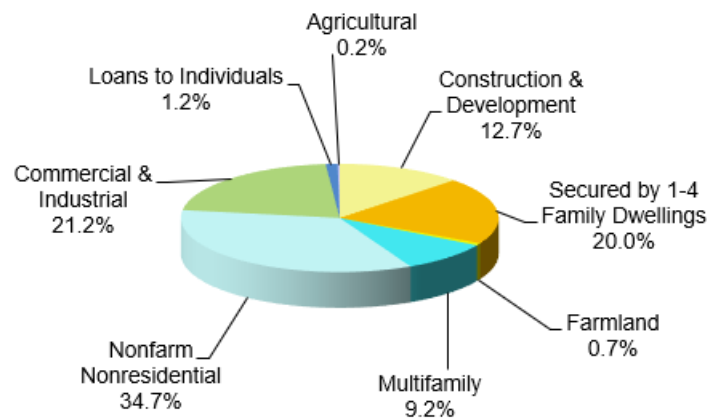
\*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included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



### Loan Portfolio Trend



### Loan Portfolio as of 12/31/2024



For purposes of the CRA, Bank Independent has defined the following four AAs:

- Colbert and Lauderdale counties in the Florence – Muscle Shoals, AL MSA;
- Limestone and Madison counties in the Huntsville, AL MSA;
- Lawrence and Morgan counties in the Decatur, AL MSA;
- Franklin County, AL in a non-MSA.

Bank Independent complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AA. The bank received a “Satisfactory” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated March 13, 2023 under the Large 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 and competitive factors, as well as the economic and demographic characteristics of its defined AAs. Bank Independent’s CRA performance evaluation was based on CRA activities within its AAs using the Large Institution Examination Procedures. Large institution performance standards consist of three separately rated tests: Lending, Investment, and Service.

Full-scope reviews were conducted on two of the bank’s four AAs (Florence-Muscle Shoals and Huntsville). When determining the overall rating, the greatest weight was placed on performance in the Florence-Muscle Shoals AA because it accounts for the majority of the deposits and lending activity.

#### **Lending Test**

Under the Lending Test, performance is evaluated using the following criteria and time frames.

#### *Lending Test Review Period, Products Reviewed, and Product Weighting*

<b>Lending Test Performance Criterion</b>	<b>Products Selected for Review</b>	<b>Time Period</b>
Level of Lending Activity	<ul style="list-style-type: none"><li>• HMDA-reportable loans</li><li>• Small business loans</li></ul>	January 1, 2022 – December 31, 2024
Assessment Area Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower’s Profile		
Community Development Lending		October 1, 2022 – December 31, 2024
Product Innovation		

Given the bank’s asset size and office(s) located in an MSA, it submits annual reports about its residential real estate loan originations and applications pursuant to the HMDA. These loans are referred to as “HMDA-reportable” loans in this evaluation. A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm or nonresidential real estate or classified as a commercial loan.

Unless otherwise noted within individual AAs, the following criteria apply throughout the report:

- The bank originated a higher volume of HMDA-reportable loans than small business loans during the review period. As such, HMDA-reportable lending carried more weight in deriving the bank's overall performance conclusions. See the full-scope AA sections for additional details on product origination volumes during the review period.
- As defined in *Appendix C*, HMDA-reportable loans include various loan categories. There was sufficient volume for analysis in three of the loan categories: home purchase, home refinance, and home improvement. Weighting of HMDA-reportable loan categories are presented in order of significance within each AA.
- Equal emphasis was placed on lending performance in 2022, 2023, and 2024 in deriving overall conclusions for geographic and borrower distribution.
- The housing affordability ratio referenced in individual AAs throughout the document is calculated by dividing the median household income by the median housing value. Values closer to 100 percent indicate greater affordability.

#### *Lending Test Analysis Comparisons*

Lending Test analyses entail comparisons of bank performance each year to applicable AA demographics and the performance of other lenders for the same year. Under the Lending Test, comparisons to AA demographics for the 2022, 2023, and 2024 years are based on 2024 FFIEC Census Data and 2016-2020 American Community Survey (ACS) data. Certain business demographics are based on Dun & Bradstreet (D&B) data applicable to the year of bank lending activity being considered. Key demographic data used for analysis is discussed in the *Description of Institution's Operations* section of each full-scope AA; additional demographic tables are found in *Appendix D* (full-scope AAs) and *Appendix F* (limited-scope AAs).

#### Investment Test

CD investments, including grants and donations, made between October 1, 2022 and December 31, 2024 were reviewed. In addition, investments made prior to October 1, 2022 but still outstanding as of this review date were also considered. Qualified investments and grants were evaluated to determine the overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and CD needs of the AAs.

#### Service Test

Under the Service Test, performance is evaluated using the following criteria and time frames.

Service Test Performance Criterion	Time Period
Accessibility of Delivery Systems	January 1, 2022 – December 31, 2024
Changes in Branch Locations	
Reasonableness of Business Hours and Services	
Community Development Services	October 1, 2022 – December 31, 2024

Community Contacts

As part of the CRA evaluation, community contacts were made with local community, governmental, and economic development representatives familiar with the economic and demographic characteristics as well as CD opportunities in the AAs. Information obtained from the contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from community contacts is included in the applicable section of the evaluation for each AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

LENDING TEST

Overview

Bank Independent's Lending Test rating is High Satisfactory. Overall, lending activity shows good responsiveness to credit needs throughout the AAs. The bank made a substantial majority of its loans inside its AAs. The geographic distribution of loans reflects good penetration through the AAs. The bank's lending to LMI borrowers and small businesses is adequate. Additionally, the bank is a leader in originating CD loans.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The total number and dollar volume of HMDA-reportable and small business loans was considered in arriving at Lending Activity conclusions, as well as competitive factors and the bank's overall importance to each AA.

The following table displays the volume of lending activity from January 1, 2022 through December 31, 2024, by loan type.

**Summary of Lending Activity**

<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>Total Consumer related</b>	<b>0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>
Home Improvement	229	--	\$17,562	--
Home Purchase	1,066	--	\$279,774	--
Multi-Family Housing	87	--	\$89,434	--
Refinancing	1,105	--	\$141,743	--
Other Purpose Closed-End	67	--	\$6,281	--
Other Purpose LOC	237	--	\$28,139	--
<b>Total HMDA related</b>	<b>2,791</b>	<b>63</b>	<b>\$562,933</b>	<b>68</b>
<b>Total Non-HMDA related</b>	<b>0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>
Small Business	1,541	--	\$258,128	--
<b>Total Small Business related</b>	<b>1,541</b>	<b>35</b>	<b>\$258,128</b>	<b>31</b>
Small Farm	122	--	\$12,683	--
<b>Total Small Farm related</b>	<b>122</b>	<b>3</b>	<b>\$12,683</b>	<b>2</b>
<b>TOTAL LOANS</b>	<b>4,454</b>	<b>100</b>	<b>\$833,744</b>	<b>100</b>

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.



### AA Concentration

The bank originated a substantial majority of the total loans reviewed to borrowers and businesses residing in or located within its AAs. The table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside of the AAs.

### **Lending Inside and Outside the Assessment Area**

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	222	96.9	\$16,911	96.3	7	3.1	\$651	3.7
Home Purchase - Conventional	875	90.2	\$212,329	82.8	95	9.8	\$44,200	17.2
Home Purchase - FHA	63	100.0	\$13,131	100.0	0	0.0	\$0	0.0
Home Purchase - VA	32	97.0	\$9,675	95.7	1	3.0	\$439	4.3
Multi-Family Housing	79	90.8	\$83,817	93.7	8	9.2	\$5,617	6.3
Other Purpose Closed-End	64	95.5	\$5,501	87.6	3	4.5	\$780	12.4
Other Purpose LOC	225	94.9	\$25,814	91.7	12	5.1	\$2,325	8.3
Refinancing	1,053	95.3	\$131,706	92.9	52	4.7	\$10,037	7.1
<b>Total HMDA related</b>	<b>2,613</b>	<b>93.6</b>	<b>\$498,884</b>	<b>88.6</b>	<b>178</b>	<b>6.4</b>	<b>\$64,049</b>	<b>11.4</b>
Small Business	1,451	94.2	\$231,652	89.7	90	5.8	\$26,476	10.3
<b>Total Small Bus. related</b>	<b>1,451</b>	<b>94.2</b>	<b>\$231,652</b>	<b>89.7</b>	<b>90</b>	<b>5.8</b>	<b>\$26,476</b>	<b>10.3</b>
Small Farm	118	96.7	\$12,009	94.7	4	3.3	\$674	5.3
<b>Total Small Farm related</b>	<b>118</b>	<b>96.7</b>	<b>\$12,009</b>	<b>94.7</b>	<b>4</b>	<b>3.3</b>	<b>\$674</b>	<b>5.3</b>
<b>TOTAL LOANS</b>	<b>4,182</b>	<b>93.9</b>	<b>\$742,545</b>	<b>89.1</b>	<b>272</b>	<b>6.1</b>	<b>\$91,199</b>	<b>10.9</b>

Note: Affiliate loans not included

As shown, 93.6 percent of HMDA-reportable loans and 94.2 percent of small business loans were to borrowers and businesses within the bank's AAs. This indicates the bank's willingness to originate loans that meet the credit needs of its AAs.

### Distribution of Lending by Geography and by Borrower Income and Business Size

The geographic distribution of HMDA-reportable and small business loans reflects good penetration throughout the AAs, given the opportunity and competition in these markets. The analyses of HMDA-reportable and small business lending within each AA are discussed in detail later in this report.

The distribution of lending to borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes. The analyses of HMDA-reportable and small business lending within each AA are discussed in detail later in this report.

### CD Lending

Bank Independent is a leader in making CD loans. Since the previous examination, the bank originated 13 qualified CD loans totaling \$42.0 million in its AAs, primarily for the purposes of affordable housing and

revitalization of LMI geographies. This performance is responsive to the credit needs of the AAs; therefore, consideration was also given to CD loans outside the bank's AAs. The bank made 18 qualified CD loans totaling \$11.6 million outside its AAs during the review period, all of which financed affordable housing for LMI individuals and families. More information on CD loans can be found in the full-scope AA sections of this report.

### Product Innovation

The bank makes use of innovative and/or flexible lending practices in serving the credit needs of its AAs. In deriving this conclusion, consideration was given to the variety of offerings and the impact of the offerings. Descriptions of each innovative and/or flexible lending option offered during the review period are as follows.

*HomeReady/HomePossible:* These mortgage programs are offered through Fannie Mae and Freddie Mac and are available to LMI borrowers. The programs feature terms that are more flexible than traditional government-insured loans, such as lower down payment, cancellable mortgage insurance, and flexible funding source options such as gifts and grants. During the review period, the bank originated 54 loans totaling \$9.8 million through these programs.

*Federal Housing Administration (FHA)/U.S. Department of Veterans Affairs (VA) Insured Loan Programs:* These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payment requirements. During the review period, the bank originated 38 FHA loans totaling \$7.9 million and 25 VA loans totaling \$8.0 million.

*USDA Rural Development Loan Program:* This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas and features no down payment or mortgage insurance requirements. During the review period, the bank originated 13 loans for \$2.5 million through this program.

### *Down Payment Assistance (DPA) Programs*

- *Alabama Housing Finance Authority Step Up Program:* This loan program is designed to assist low- to moderate-income homebuyers with down payments and closing costs. The program offers up to \$10,000 in down payment assistance. During the review period, the bank originated 1 loan for \$212,100 through this program.
- *Federal Home Loan Bank of Atlanta First-Time Homebuyer Program:* This loan program is designed to assist LMI homebuyers with down payments and closing costs. As of 2024, this program offered up to \$12,500 in down payment assistance. During the review period, the bank originated 9 loans for \$1.4 million through this program.
- *Federal Home Loan Bank of Atlanta Community Partners Program:* This loan program is designed to assist LMI homebuyers who work in eligible career fields with down payments and closing costs. Eligible career fields include law enforcement officers, educators, health care workers, and firefighters. As of 2024, the program offered up to \$15,000 in down payment assistance. During the review period, the bank originated 2 loans for \$375,518 through this program.

### INVESTMENT TEST

Bank Independent's Investment Test rating is Low Satisfactory. The bank makes an adequate level of qualified CD investments and grants, makes rare use of innovative and/or complex investments to support CD initiatives, and exhibits adequate responsiveness to credit and CD needs.

During the review period, the bank made nine current-period qualified investments totaling \$1.8 million that directly benefited its AAs. Additionally, the bank made 143 qualified donations totaling \$224,408 directly benefiting its AAs and six qualifying donations totaling \$44,000 benefiting the broader statewide or regional area that included its AAs.

The bank was responsive to the needs of its AAs. As such, consideration was also given to investments made outside the bank's AAs. During the review period, the bank made 12 qualifying investments totaling \$10.0 million outside its AAs. The majority of these dollars are attributable to a low-income housing development fund that the bank participates in, which invests in low-income housing tax credits (LIHTCs) across the United States. Bank Independent made a total commitment of \$8.5 million to this fund. Additionally, the bank received consideration for two donations totaling \$5,500 to CD organizations that have a national footprint. More information on the bank's CD investments and donations can be found in the full-scope AA sections of this report.

#### SERVICE TEST

Bank Independent's Service Test rating is High Satisfactory. Bank Independent's retail delivery systems are accessible to its geographies and individuals of different income levels. Additionally, the bank's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly to LMI geographies and individuals. Services do not vary in a way that inconveniences the AAs, particularly LMI geographies and individuals. Many facilities offer weekend hours to accommodate customers. Additionally, the bank has a digital banking office that provides full-service remote teller services, including account opening, deposits, transfers, and account maintenance services from 8 AM to 8 PM, Monday through Saturday.

The bank provides a relatively high level of CD services throughout its AAs. Employees served in various capacities related to the provision of financial services, primarily on boards and committees, for a variety of CD organizations. Staff contributed 1,272 hours of qualifying CD services during the review period. This amount includes 123 hours of service to CD organizations that serve the entire state of Alabama. More information on the bank's retail and community services can be found in the full-scope AA sections of this report.

#### 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.

**METROPOLITAN AREA - FLORENCE-MUSCLE SHOALS, AL MSA**  
**FULL-SCOPE REVIEW**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FLORENCE-MUSCLE SHOALS AA**

Overview

The Florence AA includes Colbert and Lauderdale counties, which comprise the Florence-Muscle Shoals MSA. The Florence AA accounts for 52.7 percent of the bank's total deposits and 55.2 percent of its total HMDA-reportable and small business loans (by number). Bank Independent operates 15 branches in the Florence AA as of December 31, 2024, representing 44.1 percent of the its total branch network. Of the branches in the AA, two are in low-income census tracts, four are in moderate-income census tracts, eight are in middle-income census tracts, and one is in an upper-income census tract.

According to the FDIC Summary of Deposits Report, as of June 30, 2024 there were 14 financial institutions operating 48 branch offices in the Florence AA with a total of \$3.9 billion in deposits. Bank Independent ranked first in deposit market share with 31.6 percent of deposits. First Metro Bank also held a large share of deposits in the AA at 20.3 percent, followed by First Southern Bank with 13.3 percent and CB&S Bank, Inc. with 7.8 percent.

For HMDA-reportable lending, Bank Independent originated or purchased 12.3 percent of the HMDA-reportable loans in the AA during 2022, ranking 1st out of 231 reporters. In 2023, the bank originated or purchased 12.1 percent of the HMDA-reportable loans in the AA, ranking 1st out of 218 reporters. In 2024, Bank Independent originated or purchased 12.5 percent of the HMDA-reportable loans in the AA and ranked 1st out of 222 reporters. Other top HMDA reporters in the market were Listerhill Credit Union and Trustmark National Bank.

For small business lending, Bank Independent ranked 3rd out of 66 reporters in 2022 with 10.5 percent of reported loans in the AA. In 2023, the bank ranked 4th out of 66 reporters with 10.1 percent of reported loans in the AA. In 2024, Bank Independent again ranked 4th out of 63 reporters with 8.9 percent of reported loans in the AA. Other leading small business reporters in the market were American Express, J.P. Morgan Chase Bank, and Synchrony Bank.

Population and Income Characteristics

The Florence AA has experienced modest population growth in recent years. The AA population was approximately 156,287 as of 2024, representing an increase of 3.6 percent since the 2020 Census.<sup>2</sup> Lauderdale County, where the city of Florence is located, is the largest county in the AA with a population of 97,502 in 2024.<sup>3</sup> The highest population growth rate in the AA has been in Lauderdale County. Between 2020 and 2024, population increased by 4.2 percent in Lauderdale County and 2.7 percent in Colbert County.<sup>4</sup>

The AA contains 41 census tracts: three low-income tracts (7.3 percent), eight moderate-income tracts (19.5 percent), 21 middle-income tracts (51.2 percent), eight upper-income tracts (19.5 percent), and one unknown-income tract (2.4 percent).

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<sup>2</sup> "QuickFacts." *United States Census Bureau*,  
<https://www.census.gov/quickfacts/fact/table/AL,colbertcountyalabama,lauderdalecountyalabama,florencecityalabama/PST045224>.  
Accessed 5 June 2025.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Florence-Muscle Shoals, AL MSA. As shown, the median family income increased from \$68,200 in 2022 to \$78,300 in 2024.

**Borrower Income Levels  
Florence-Muscle Shoals, AL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
<b>2022</b>	<b>\$68,200</b>	0	- \$34,099	\$34,100	- \$54,559	\$54,560	- \$81,839	\$81,840	- & above
<b>2023</b>	<b>\$74,100</b>	0	- \$37,049	\$37,050	- \$59,279	\$59,280	- \$88,919	\$88,920	- & above
<b>2024</b>	<b>\$78,300</b>	0	- \$39,149	\$39,150	- \$62,639	\$62,640	- \$93,959	\$93,960	- & above

There are 38,521 total families in the AA. Of these families, 20.6 percent are low-income, 18.6 percent are moderate-income, 21.4 percent are middle-income, and 39.3 percent are upper-income. Additionally, 9.9 percent of families have incomes below the poverty level, which is lower than the 11.6 percent poverty level for the state of Alabama. Within the AA, families below the poverty level for Colbert County is slightly higher at 11.7 percent, while families below the poverty level in Lauderdale County is lower at 8.8 percent.

**Economic Conditions**

The Florence AA is located in northwest Alabama and borders the states of Mississippi and Tennessee. This area in Alabama is known as “The Shoals,” and includes both Colbert and Lauderdale counties.<sup>5</sup> The urban center of the Florence-Muscle Shoals MSA is comprised of four cities, which include Muscle Shoals, Sheffield, Tuscumbia, and Florence.<sup>6</sup> The local industries with the fastest job growth during the review period included manufacturing, retail trade, healthcare and social assistance, and accommodations and food service.<sup>7</sup> Meanwhile, the agriculture, mining, and administrative and waste services industries saw decreases in total jobs during the same period.<sup>8</sup> Targeted industries for growth and development in The Shoals include automotive suppliers, information technology, advanced manufacturing, and aerospace.<sup>9</sup> The area has a diverse manufacturing base which has grown in recent years. This data aligns with information provided by a community contact. Some of the largest manufacturing employers in the area include North American Lighting, Constellium, and Essity.<sup>10</sup> Other major employers include North Alabama Medical Center, North Alabama Shoals Hospital, University of North Alabama, and Northwest Shoals Community College.<sup>11</sup>

<sup>5</sup> “Living Here.” The Shoals Economic Development Authority, <https://www.seda-shoals.com/living-here>. Accessed 5 June 2025.

<sup>6</sup> Ibid.

<sup>7</sup> FRB Atlanta calculations of Bureau of Labor Statistics (BLS), Quarterly Census of Employment and Wages.

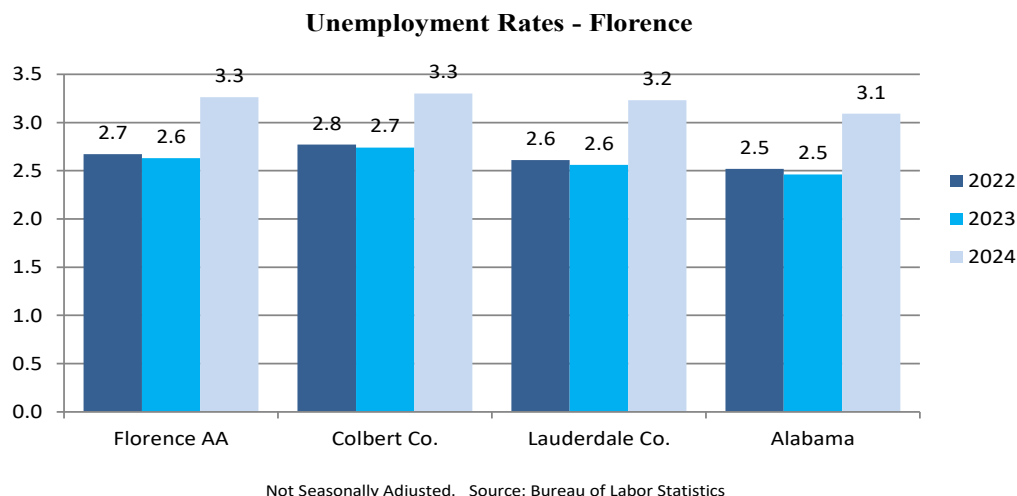
<sup>8</sup> Ibid.

<sup>9</sup> “Spotlight: Lauderdale & Colbert.” Business Alabama, <https://businessalabama.com/spotlight-lauderdale-colbert-counties/>. Accessed 5 June 2025.

<sup>10</sup> Ibid.

<sup>11</sup> “Spotlight on Colbert & Lauderdale: Economic Engines.” Business Alabama, <https://businessalabama.com/spotlight-on-colbert-lauderdale-economic-engines/>. Accessed 5 June 2025.

As displayed in the following chart, the unemployment rate increased modestly in both AA counties during the review period. Colbert County had the highest unemployment rate during the review period (3.3 percent in 2024), while Lauderdale County had the lowest (2.6 percent in 2022 and 2023). Additionally, the unemployment rate for the AA (3.3 percent in 2024) was slightly higher than the Alabama statewide unemployment rate (3.1 percent in 2024) during the review period.



### Housing Characteristics

There are 71,999 total housing units in the AA, of which 58.1 percent are owner-occupied, 25.7 percent are rental units, and 16.2 percent are vacant. Housing units in the AA are mostly owner-occupied, which indicates home lending opportunities in the AA. Fewer home ownership opportunities exist in low-income tracts; only 30.8 percent of housing units in low-income tracts are owner-occupied and 49.6 percent of units are rentals.

The median age of housing stock across the AA is 47 years, which is older than the median age of housing stock for the state of Alabama (36 years). Housing units in LMI census tracts are older, with a median age of 60 years in low-income tracts and 56 years in moderate-income tracts. The older age of homes is an indicator of potential opportunity for home improvement loans in LMI tracts.

Housing values in the AA increased considerably during the review period. As of January 2022, the median listing price for a home in the Florence-Muscle Shoals, AL MSA was \$208,950.<sup>12</sup> As of December 2024, the median listing price for a home in the area was \$294,400.<sup>13</sup> This represents a 40.9 percent increase during the review period.

Median gross rent in the AA is \$682 per month, which is lower than the median gross rent in the state of Alabama overall (\$811 per month). Within the AA, the percentage of renters with rent costs greater than 30 percent of income (36.5 percent) is lower than the state of Alabama at 40.8 percent. The data suggests that housing is slightly

<sup>12</sup> “Market Hotness: Median Listing Price in Florence-Muscle Shoals, AL (CBSA).” *Federal Reserve Bank of St. Louis*, <https://fred.stlouisfed.org/series/MELIPRMSA22520>. Accessed 17 June 2025.

<sup>13</sup> Ibid.

more affordable in the AA compared to the state of Alabama, which is consistent with information provided by a community contact.

#### Credit and CD Needs

To better understand the local CD and economic landscapes, an individual familiar with the community and CD was contacted. This individual discussed the various opportunities and challenges in the AA and how financial institutions can be responsive to local CD needs.

This contact was from an organization that provides technical assistance to start-ups and small businesses and stated that Florence's population and economy are both steady and the unemployment rate is low in the area. Housing conditions have been fairly stable for the last 2-3 years. There has been an increase in the development of quality rentals over the past several years. The contact mentioned that prices have remained fairly affordable for single family and multifamily housing. The contact also reported observing the development of a healthy start-up and small business ecosystem in the area. In addition, the city is planning the construction of a new bridge/roadway while investors are also exploring the development of mixed-use properties in West Florence. The contact stated that there are no areas that were significantly lagging.

There is a challenge in engaging the young people to stay and live in the area. The contact stated it is typical for a University of North Alabama graduate to relocate to the cities of Huntsville or Nashville after graduation. The local universities have started a new program for students to explore entrepreneurship. The contact also stated that obtaining a pool of skilled employees in high tech industries is an obstacle for small business development. Additionally, he expressed that early-stage business financing is a challenge and that early-stage small business owners usually have to self-finance. The contact mentioned that there is a shortage of seed funding and would like to see more flexible financing and seed capital loan funds for small businesses. This need presents an opportunity for CRA investments and loans in the AA.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

#### LENDING TEST

Lending levels reflect good responsiveness to credit needs of the Florence-Muscle Shoals AA. The geographic distribution of loans reflects good penetration throughout the AA and the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making CD loans in the AA.

The analysis included 1,537 HMDA-reportable loans and 706 small business loans reported by the bank in the AA during the review period. As such, HMDA-reportable loans carried greater weight than small business loans in determining conclusions. Additionally, the full-scope lending tables in *Appendix E* show that during 2022, 2023, and 2024, the bank originated or purchased 555 home purchase loans, 656 home refinance loans, and 116 home improvement loans in the AA. Thus, when considering HMDA-reportable loan categories, greatest weight was assigned to home refinance loans given their relative share of the total HMDA-reportable lending in this AA, followed by home purchase loans and, to a lesser extent, home improvement loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in *Appendix E*.

### Lending Activity

Lending activity reflects good responsiveness to AA credit needs. Overall, 55.2 percent of the bank's combined HMDA-reportable and small business lending volume (by number) were made in the AA. The percentage of HMDA-reportable lending volume (58.8 percent) exceeds the percentage of its deposits in the AA (52.7 percent), while small business lending volume (48.7 percent) is below the percentage of its area deposits (52.7 percent).

### Geographic Distribution of Loans

The geographic distribution of loans reflects good penetration throughout the AA. As described in the following sections, overall performance for HMDA-reportable lending is good and small business lending performance is excellent.

#### *Home Refinance Loans – Good*

Home refinance lending in low-income tracts is good. During the 2022-2024 review period, the bank's home refinance lending in low-income tracts (2.0 percent) was equal to the percentage of owner-occupied units (2.0 percent) in these tracts. In 2022, the bank's home refinance lending in low-income tracts (1.8 percent) was similar to aggregate performance (1.9 percent). In 2023, the bank's home refinance lending in low-income tracts (1.6 percent) was above aggregate performance (1.2 percent). In 2024, the bank's home refinance lending in low-income tracts (2.6 percent) was above aggregate performance (1.6 percent) in these tracts.

Home refinance lending in moderate-income tracts is adequate. During the 2022-2024 review period, the bank's home refinance lending in moderate-income tracts (15.1 percent) was similar to the percentage of owner-occupied units (14.7 percent) in these tracts. In 2022, the bank's home refinance lending in moderate-income tracts (16.1 percent) was above aggregate performance (14.4 percent). In 2023, the bank's home refinance lending in moderate-income tracts (12.3 percent) was below aggregate performance (15.3 percent). In 2024, the bank's home refinance lending in moderate-income tracts (16.3 percent) was above aggregate performance (14.6 percent).

#### *Home Purchase Loans – Good*

Home purchase lending in low-income tracts is good. During the 2022-2024 review period, the bank's home purchase lending in low-income tracts (2.0 percent) was equal to the percentage of owner-occupied units (2.0 percent) in these tracts. In 2022, the bank's home purchase lending in low-income tracts (2.1 percent) was above aggregate performance (0.8 percent). In 2023, the bank's home purchase lending in low-income tracts (1.3 percent) was similar to aggregate performance (1.4 percent). In 2024, the bank's home purchase lending in low-income tracts (2.4 percent) was above aggregate performance (1.7 percent).

Home purchase lending in moderate-income tracts is good. During the 2022-2024 review period, the bank's home purchase lending in moderate-income tracts (21.4 percent) was above the percentage of owner-occupied units (14.7 percent) in these tracts. In 2022, the bank's home purchase lending in moderate-income tracts (21.8 percent) was above aggregate performance (18.3 percent). In 2023, the bank's home purchase lending in moderate-income tracts (22.2 percent) was above aggregate performance (18.0 percent). In 2024, the bank's home purchase lending in moderate-income tracts (20.6 percent) was above aggregate performance (19.1 percent).

#### *Home Improvement Loans – Adequate*

Home improvement lending in low-income tracts is poor. During the 2022-2024 review period, the bank did not make any home improvement loans in low-income tracts. Meanwhile, 2.0 percent of total owner-occupied units



in the AA were located in low-income tracts. Moreover, 1.5 percent of aggregate home improvement loans originated in the AA during the review period were located in low-income tracts. Because the bank made no loans while demographic and aggregate data demonstrated opportunity, this represents poor performance.

Home improvement lending in moderate-income tracts is adequate. During the 2022-2024 review period, the bank's home improvement lending in moderate-income tracts (17.2 percent) was above the percentage of owner-occupied units (14.7 percent) in these tracts. In 2022, the bank's home improvement lending in moderate-income tracts (14.6 percent) was below aggregate performance (16.3 percent). In 2023, the bank's home improvement lending in moderate-income tracts (15.9 percent) was similar to aggregate performance (15.6 percent) in these tracts. In 2024, the bank's home improvement lending in moderate-income tracts (22.6 percent) was above aggregate performance (17.3 percent).

#### *Small Business Loans – Excellent*

Small business lending in low-income tracts is excellent. During the 2022-2024 review period, the bank's small business lending in low-income tracts (12.9 percent) was above the percentage of total businesses located in these tracts (11.8 percent). In 2022, the bank's small business lending in low-income tracts (12.0 percent) was above aggregate performance (8.6 percent). In 2023, the bank's small business lending in low-income tracts (15.0 percent) was above aggregate performance (8.8 percent). In 2024, the bank's small business lending in low-income tracts was 11.5 percent. Although 2024 aggregate data was not yet publicly available at the time of this CRA evaluation, this performance demonstrated continued responsiveness to AA credit needs.

Small business lending in moderate-income tracts is good. During the 2022-2024 review period, the bank's small business lending in moderate-income tracts (19.1 percent) was above the percentage of total businesses located in these tracts (16.8 percent). In 2022, the bank's small business lending in moderate-income tracts (17.4 percent) was above aggregate performance (14.3 percent). In 2023, the bank's small business lending in moderate-income tracts (18.8 percent) was above aggregate performance (14.5 percent). In 2024, the bank's small business lending in moderate-income tracts was 21.6 percent. Although 2024 aggregate data was not yet publicly available at the time of this CRA evaluation, this performance demonstrated continued responsiveness to AA credit needs.

No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. The bank had lending activity in all of the AA's census tracts throughout the review period, and maps did not indicate an absence of loans across LMI tracts.

#### Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues is adequate. As described in the following sections, overall performance is adequate for both HMDA-reportable and small business lending.

#### *Home Refinance Loans – Good*

Home refinance lending to low-income borrowers is good. During the 2022-2024 review period, the bank's home refinance lending to low-income borrowers (13.6 percent) was below the percentage of low-income families (20.6 percent) in the AA. In 2022, the bank's home refinance lending to low-income borrowers (9.7 percent) was above aggregate performance (8.6 percent). In 2023, the bank's home refinance lending to low-income borrowers (15.5 percent) was above aggregate performance (9.6 percent). In 2024, the bank's home refinance lending to low-income borrowers (17.4 percent) was above aggregate performance (8.9 percent).

Home refinance lending to moderate-income borrowers is adequate. During the 2022-2024 review period, the bank's home refinance lending to moderate-income borrowers (14.6 percent) was below the percentage of moderate-income families (18.6 percent) in the AA. In 2022, the bank's home refinance lending to moderate-income borrowers (13.3 percent) was below aggregate performance (15.9 percent). In 2023, the bank's home refinance lending to moderate-income borrowers (15.0 percent) was similar to aggregate performance (15.7 percent). In 2024, the bank's home refinance lending to moderate-income borrowers (16.3 percent) was similar to aggregate performance (15.4 percent).

*Home Purchase Loans – Adequate*

Home purchase lending to low-income borrowers is adequate. During the 2022-2024 review period, the bank's home purchase lending to low-income borrowers (6.8 percent) was below the percentage of low-income families (20.6 percent) in the AA. In 2022, the bank's home purchase lending to low-income borrowers (6.4 percent) was similar to aggregate performance (5.9 percent). In 2023, the bank's home purchase lending to low-income borrowers (5.1 percent) was similar to aggregate performance (5.8 percent). In 2024, the bank's home purchase lending to low-income borrowers (8.6 percent) was above aggregate performance (6.3 percent).

Home purchase lending to moderate-income borrowers is poor. During the 2022-2024 review period, the bank's total home purchase lending to moderate-income borrowers (14.8 percent) was below the percentage of moderate-income families (18.6 percent) in the AA. In 2022, the bank's home purchase lending to moderate-income borrowers (13.3 percent) was below aggregate performance (18.2 percent). In 2023, the bank's home purchase lending to moderate-income borrowers (10.1 percent) was below aggregate performance (18.3 percent). In 2024, the bank's home purchase lending to moderate-income borrowers (19.6 percent) was above aggregate performance (18.0 percent).

*Home Improvement Loans – Poor*

Home improvement lending to low-income borrowers is poor. During the 2022-2024 review period, the bank's home improvement lending to low-income borrowers (6.9 percent) was below the percentage of low-income families (20.6 percent) in the AA. In 2022, the bank's home improvement lending to low-income borrowers (7.3 percent) was below aggregate performance (9.0 percent). In 2023, the bank's home improvement lending to low-income borrowers (6.8 percent) was below aggregate performance (8.7 percent). In 2024, the bank's home improvement lending to low-income borrowers (6.5 percent) was below aggregate performance (10.5 percent).

Home improvement lending to moderate-income borrowers is poor. During the 2022-2024 review period, the bank's home improvement lending to moderate-income borrowers (11.2 percent) was below the percentage of moderate-income families (18.6 percent) in the AA. In 2022, the bank's home improvement lending to moderate-income borrowers (12.2 percent) was similar to aggregate performance (12.4 percent). In 2023, the bank's home improvement lending to moderate-income borrowers (15.9 percent) was similar to aggregate performance (16.1 percent). In 2024, the bank's home improvement lending to moderate-income borrowers (3.2 percent) was below aggregate performance (13.6 percent). This poor performance was mainly driven by the bank's weak performance among this borrower category in 2024.

*Small Business Loans – Adequate*

Small business lending to businesses of different sizes is adequate. During the 2022-2024 review period, the bank's small business lending to businesses with \$1 million or less in revenue (54.5 percent) was below the percentage of total businesses in the AA with revenues of \$1 million or less (91.3 percent). In 2022, the bank's small business lending to businesses with \$1 million or less in revenue (55.0 percent) was above aggregate

performance (53.3 percent). In 2023, the bank's small business lending to businesses with \$1 million or less in revenue (56.3 percent) was above aggregate performance (54.2 percent). In 2024, the bank's small business lending to businesses with \$1 million or less in revenue was 51.9 percent. Aggregate data for 2024 was not yet publicly available at the time of this CRA evaluation, but the bank's performance in 2024 was down slightly compared to 2022 and 2023. Overall, this represents adequate distribution of small business loans to businesses of different sizes during the review period.

As stated above, the bank's small business lending to businesses with \$1 million or less in revenue was consistent with aggregate performance during the review period, representing adequate performance. The community contact mentioned that small businesses have experienced financing challenges in the AA, specifically pointing out the need for flexible lending standards for small and early-stage businesses. This need presents an opportunity in the small business lending space for local banks, including Bank Independent.

#### CD Lending

The bank is a leader in making CD loans in the Florence-Muscle Shoals AA. During the review period, the bank originated five qualified CD loans totaling \$9.5 million in the AA. All of the qualified loans financed affordable housing for LMI individuals. Several of the loans were deemed responsive to AA needs as described below.

- A \$5.3 million loan for a real estate developer to purchase and renovate a 128-unit affordable apartment complex. The renovations will improve the quality of this housing and post-renovation rents will remain affordable for LMI residents.
- A \$175,800 loan to term out a construction loan and provide permanent financing for a six-unit apartment complex. This apartment complex will provide affordable housing to six LMI families.

Given the increased prices of single-family homes during the review period, the continued construction and improvement of affordable multifamily rental housing is important for local LMI families. As such, the bank's affordable housing loans in the AA are considered responsive to community needs.

#### INVESTMENT TEST

The bank makes an adequate level of qualified CD investments and grants totaling \$220,417 in the Florence-Muscle Shoals AA. This amount includes one current period investment totaling \$116,264, no prior period investments still outstanding, and 61 donations totaling \$104,153. Investment and donation types varied and addressed a range of CD needs, including Mortgage-Backed Securities (MBS) supporting LMI borrowers, as well as donations supporting local schools and LMI-focused community organizations. The bank made rare use of innovative and/or complex investments to support CD initiatives. Additionally, the bank exhibits adequate responsiveness to credit and CD needs.

Examples of noteworthy investments and grants provided during the review period include:

- Two donations totaling \$40,100 to support workforce development and training initiatives at local LMI schools. This skills training will provide local high school graduates with improved job opportunities upon graduation.
- Two donations totaling \$12,500 to an organization dedicated to revitalizing the historic downtown Florence area, which includes several LMI tracts.

- Two donations totaling \$3,500 to a community garden created to provide fresh vegetables for local residents in need.

### SERVICE TEST

Retail banking services are readily accessible and do not vary in a way that inconveniences the Florence-Muscle Shoals AA. Additionally, the bank provides a relatively high level of CD services in its AA.

### Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels throughout the Florence-Muscle Shoals AA. The distribution of the bank's branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the AA. The bank did not open or close any branches during the review period, which resulted in no effect on the accessibility of its delivery systems. Hours of operation are generally 9 AM to 5 PM during the week, with several branches also open from 9 AM to 1 PM on Saturdays. Additionally, the bank has a digital banking office that provides full-service remote teller services, including account opening, deposits, transfers, and account maintenance services from 8 AM to 8 PM, Monday through Saturday. The bank offers the same suite of products and services throughout its AA. Thus, hours and services do not vary in a way that inconveniences the AA.

The table below shows the distribution of branches and ATMs along with households and businesses by tract category.

**Geographic Distribution of Branches & ATMS**  
Assessment Area: AL Florence

Tract Category	Branches							ATMs								Demographics			
	Total Branches			Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs			
	#	%							#	%		#	%	Open	Closed	#	%	Open	Closed
Low	2	13.3%	0	0	1	2	1		Total	1	8.3%	1	8.3%	0	0	0	0.0%	0	0
DTO	0		0	0	0				SA	0		0		0	0	0		0	0
Moderate	4	26.7%	0	0	4	4	4		Total	3	25.0%	3	25.0%	0	0	0	0.0%	0	0
DTO	1		0	0	1				SA	0		0		0	0	0		0	0
Middle	8	53.3%	0	0	7	8	4		Total	7	58.3%	7	58.3%	0	0	0	0.0%	0	0
DTO	0		0	0	0				SA	1		1		0	0	0		0	0
Upper	1	6.7%	0	0	1	1	1		Total	1	8.3%	1	8.3%	0	0	0	0.0%	0	0
DTO	0		0	0	0				SA	0		0		0	0	0		0	0
Unknown	0	0.0%	0	0	0	0	0		Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0
DTO	0		0	0	0				SA	0		0		0	0	0		0	0
Total	15	100%	0	0	13	15	10		Total	12	100%	12	100%	0	0	0	0.0%	0	0
DTO	1		0	0	1				SA	1		1		0	0	0		0	0

Based on 2024 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

### CD Services

The bank provides a relatively high level of CD services in the Florence-Muscle Shoals AA. During the review period, employees provided 33 qualifying CD service activities totaling 616 hours to 18 organizations operating throughout the AA. Bank staff provided financial services in a variety of ways, including memberships on boards of directors and advisory committees.

Noteworthy CD services include:

- A bank executive provided 84 hours of service as a board member for a local economic development organization tasked with recruiting new businesses and jobs to the area.

- A bank officer provided 62 hours of service as a board member for an organization focused on revitalizing downtown Florence, which includes several LMI tracts.
- A bank officer provided 48 hours of service as a board member for a nonprofit that builds affordable housing for LMI families.

**METROPOLITAN AREA – HUNTSVILLE MSA  
FULL-SCOPE REVIEW**

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HUNTSVILLE AA**

Overview

The Huntsville AA includes Limestone and Madison counties, which comprise the Huntsville, AL MSA. As of December 31, 2024, Bank Independent operated eight branches in this AA, representing 23.5 percent of its total branches. Of the branches in the AA, none are in low-income census tracts, two are in moderate-income census tracts, three are in middle-income census tracts, and three are in upper-income census tracts. The AA accounts for 26.6 percent of the institution’s combined HMDA-reportable and small business lending volume and 19.7 percent of its total deposit volume.

Huntsville is a highly competitive banking market. According to the FDIC Summary of Deposits Reports, there were 37 financial institutions operating 117 total branches in the AA as of June 30, 2024.<sup>14</sup> Collectively, these firms held \$11.4 billion of deposits in the AA. Banks holding the largest deposit market share include Regions Bank (23.1 percent), ServisFirst Bank (11.0 percent), and Synovus Bank (8.4 percent). Bank Independent ranked 7<sup>th</sup> with \$456.4 million in deposits and 4.0 percent of total deposits in the AA.

HMDA-reportable lending in the AA is similarly competitive. In 2022, Bank Independent originated or purchased 1.3 percent of total HMDA reportable loans in the AA, ranking 24<sup>th</sup> out of 464 reporters. In 2023, Bank Independent originated or purchased 1.1 percent of total HMDA reportable loans in the AA, ranking 21<sup>st</sup> out of 421 reporters. In 2024, Bank Independent originated or purchased 1.0 percent of total HMDA reportable loans in the AA, ranking 24<sup>th</sup> out of 437 reporters. During the review period, leading HMDA reporters in the AA included Redstone Federal Credit Union, Rocket Mortgage, and Regions Bank.

Small business lending in the AA is also competitive. Bank Independent ranked 16<sup>th</sup> out of 107 reporters in 2022 with 1.5 percent of reported small business loans in the AA. In 2023, Bank Independent ranked 12<sup>th</sup> out of 94 reporters with 1.4 percent of reported loans. In 2024, Bank Independent ranked 13<sup>th</sup> out of 96 reporters with 1.3 percent of reported loans. Leading CRA small business reporters in the AA included American Express, J.P. Morgan Chase, and ServisFirst Bank.

Population and Income Characteristics

The AA population was 542,297 as of July 1, 2024, representing a 10.3 percent increase since the 2020 census.<sup>15</sup> During the same period, the statewide population in Alabama increased by 2.6 percent.<sup>16</sup> The Huntsville MSA’s rapid population growth during the review period made it the 15<sup>th</sup> fastest growing metro area in the nation.<sup>17</sup>

The AA consists of 118 census tracts: 15 tracts are low-income (12.7 percent), 27 tracts are moderate-income (22.9 percent), 35 tracts are middle-income (29.7 percent), 40 tracts are upper-income (33.9 percent), and 1 tract has an unknown income level (0.8 percent).

<sup>14</sup> “Summary of Deposits – Market Share Reports.” *Federal Deposit Insurance Corporation*, 30 June 2024, <https://banks.data.fdic.gov/bankfind-suite/SOD/marketShare>. Accessed 3 June 2025.

<sup>15</sup> “QuickFacts.” *United States Census Bureau*, <https://www.census.gov/quickfacts/fact/table/madisoncountyalabama,limestonecountyalabama,AL,US/PST045224>. Accessed 4 June 2025.

<sup>16</sup> Ibid.

<sup>17</sup> “Huntsville Metro ranks 15<sup>th</sup> fastest-growing in the U.S.” *Homely Huntsville*, 20 March 2025. <https://homelyhuntsville.com/huntsville-metro-ranks-15th-fastest-growing-in-the-u-s/>. Accessed 4 June 2025.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Huntsville, AL MSA. As shown, the median family income increased from \$92,700 in 2022 to \$113,600 in 2024.

**Borrower Income Levels  
Huntsville, AL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%			Moderate 50% - 79.99%			Middle 80% - 119.99%			Upper 120% - & above		
<b>2022</b>	<b>\$92,700</b>	0	-	\$46,349	\$46,350	-	\$74,159	\$74,160	-	\$111,239	\$111,240	-	& above
<b>2023</b>	<b>\$108,200</b>	0	-	\$54,099	\$54,100	-	\$86,559	\$86,560	-	\$129,839	\$129,840	-	& above
<b>2024</b>	<b>\$113,600</b>	0	-	\$56,799	\$56,800	-	\$90,879	\$90,880	-	\$136,319	\$136,320	-	& above

According to 2024 FFIEC census data, there are 119,257 families in the AA. Of those families, 23.1 percent are low-income, 16.3 percent are moderate-income, 19.5 percent are middle-income, and 41.1 percent are upper-income. Of the total families, 8.5 percent have incomes below the poverty level.

**Economic Conditions**

The Huntsville AA has a rapidly growing economy. The area's primary industries include aerospace, defense, information technology, bioscience, and advanced manufacturing.<sup>18</sup> The largest employers include the U.S. Army Redstone Arsenal (45,500 employees), Huntsville Hospital (12,160 employees), NASA Marshall Space Flight Center (7,000 employees), Mazda Toyota Manufacturing U.S.A. (4,000 employees), and Boeing (3,411 employees).<sup>19</sup> The AA's largest industries by number of employees as of Q2 2024 include government (56,634), professional/technical services (44,706), and manufacturing (35,396).<sup>20</sup>

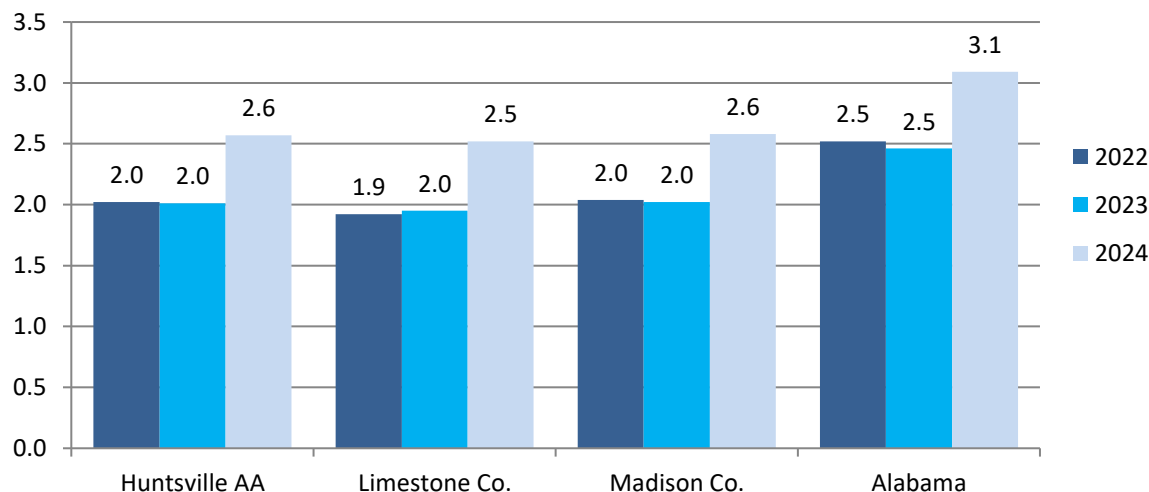
The following table shows the unemployment rate for the Huntsville AA and the state of Alabama overall. As shown, the unemployment rate in the AA was 2.0 percent in 2022 and 2023 but increased to 2.6 percent in 2024. The Alabama statewide unemployment rate at 2.5 percent was higher than the AA's unemployment rate throughout the review period. This underscores the strength of the local economy and labor market in Huntsville.

<sup>18</sup> "Huntsville Metro Economy." *ASmartPlace*, <https://asmartplace.com/metro-economy/>. Accessed 4 June 2025.

<sup>19</sup> "2025 Leading Employers: Huntsville/Madison County, Alabama." *ASmartPlace*, <https://asmartplace.com/wp-content/uploads/2025/05/Leading-Employers-May-2025.pdf>. Accessed 4 June 2025.

<sup>20</sup> Quarterly Census of Employment and Wages, Bureau of Labor Statistics (BLS).

### Unemployment Rates - Huntsville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

### Housing Characteristics

There are 200,378 housing units in the AA, of which 63.8 percent are owner-occupied, 28.2 percent are rental units, and 8.0 percent are vacant. Home ownership rates are lower in low-income tracts at 30.2 percent.

The median age of housing stock across the AA is 38 years, which is slightly older than the median for the state of Alabama (36 years). Within the AA, the median age of housing stock is older in low-income tracts (54 years) and moderate-income tracts (43 years). This indicates potential opportunities for home improvement loans in LMI tracts.

Housing values in the AA were relatively stable during the review period. As of January 2022, the median listing price for a home in the Huntsville MSA was \$374,494.<sup>21</sup> As of December 2024, the median listing price for a home in the Huntsville MSA was \$364,000.<sup>22</sup> This represents a cumulative decrease of 2.8 percent across the three-year review period.

The median gross rent in the AA is \$868 per month. This is higher than the Alabama statewide median gross rent of \$811. The data also indicates that 37.5 percent of AA renters are cost-burdened, meaning they spend more than 30 percent of gross income on rent. Further, 71.7 percent of low-income renters in the AA are cost-burdened. This indicates a need for affordable multi-family rental housing in the AA.

### Credit and CD Needs

As part of the CRA examination, information was obtained from an organization that provides technical assistance and consulting services to small businesses. The community contact stated that the Huntsville MSA is booming.

<sup>21</sup> "Housing Inventory: Median Listing Price in Huntsville, AL (CBSA)." *Federal Reserve Bank of St. Louis*, <https://fred.stlouisfed.org/series/MEDLISPR126620>. Accessed 4 June 2025.

<sup>22</sup> Ibid.



The area has seen robust economic growth, along with significant amounts of residential and industrial construction, particularly in the suburbs and exurbs. The advanced manufacturing, technology, and government industries drove further development and employment growth throughout the 2022-2024 review period. However, increased input costs in recent years have put pressure on the agricultural sector and small retailers. Moreover, federal fiscal policy shifts in 2025 have caused uncertainty in the local economy, which remains highly reliant on federal government spending.

The contact also stated that the small business lending market in the area has tightened recently. Due to current economic uncertainty, local banks have tightened their lending standards by increasing minimum debt service coverage ratios, as well as requiring additional collateral, stronger capital, or personal guarantees. The contact mentioned that more flexible lending standards (including consideration of mitigating factors), as well as greater availability of microloans (<\$50,000) for early-stage small businesses could be helpful to Huntsville's small business ecosystem. This need presents an opportunity in the small business lending space for local banks.

In addition, the contact also discussed housing conditions, describing robust new construction activity in the local area, especially in the multi-family housing space. This new construction activity has helped to keep apartment rental prices somewhat affordable, even as the area has seen population growth. According to the contact, single-family home construction activity in the AA has also been significant. However, these new construction homes start around \$400,000, which presents affordability challenges to LMI and first-time homebuyers. Considering these market conditions, continued extension of credit for multi-family housing construction will be important in ensuring affordable housing opportunities for local LMI residents.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Lending levels reflect excellent responsiveness to the credit needs of the Huntsville AA. The geographic distribution of loans reflects good penetration throughout the AA and the distribution of borrowers reflects poor penetration among customers of different income levels and businesses of different revenue sizes. The bank is a leader in making CD loans in the Huntsville AA.

The analysis included 673 HMDA-reportable loans and 410 small business loans reported by the bank in the AA during the review period. Due to this relative volume, HMDA-reportable loans carried greater weight than small business loans in determining conclusions in the AA. Additionally, the lending tables in *Appendix E* show that during 2022, 2023, and 2024, the bank originated or purchased 268 home purchase loans, 236 home refinance loans, and 62 home improvement loans in the AA. Thus, the greatest weight was assigned to home purchase loans given their relative share of the total HMDA-reportable lending in this AA, followed by home refinance loans and, to a lesser extent, home improvement loans.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in *Appendix E*.

### **Lending Activity**

Lending Activity is considered excellent. Overall, 25.8 percent of the bank's HMDA-reportable loans and 28.3 percent of its small business loans were made in the AA. The percentage of the bank's HMDA-reportable and small business lending exceeds the percentage of its total deposits in the AA (19.7 percent).

Geographic Distribution of Loans

The geographic distribution of loans reflects good penetration throughout the Huntsville AA. As described in the following sections, overall performance for HMDA-reportable lending is excellent and small business lending performance is good.

*Home Purchase Loans – Excellent*

Home purchase lending in low-income tracts is excellent. During the 2022-2024 review period, home purchase lending in low-income tracts (8.2 percent) was above the percentage of owner-occupied units (6.1 percent) in these tracts. In 2022, the bank's home purchase lending in low-income tracts (5.1 percent) was similar to aggregate performance (4.6 percent). In 2023, the bank's home purchase lending in low-income tracts (12.5 percent) was above aggregate performance (4.8 percent). In 2024, the bank's home purchase lending in low-income tracts (8.5 percent) was above aggregate performance (4.6 percent).

Home purchase lending in moderate-income tracts is excellent. During the 2022-2024 review period, the bank's home purchase lending in moderate-income tracts (24.3 percent) was above the percentage of owner-occupied units (17.4 percent) in these tracts. In 2022, the bank's home purchase lending in moderate-income tracts (23.9 percent) was above aggregate performance (15.6 percent). In 2023, the bank's home purchase lending in moderate-income tracts (17.5 percent) was above aggregate performance (15.9 percent). In 2024, the bank's home purchase lending in moderate-income tracts (32.4 percent) was above aggregate performance (15.3 percent).

*Home Refinance Loans – Excellent*

Home refinance lending in low-income tracts is excellent. During the 2022-2024 review period, the bank's home refinance lending in low-income tracts (14.4 percent) was above the percentage of owner-occupied units (6.1 percent) in these tracts. In 2022, the bank's home refinance lending in low-income tracts (18.0 percent) was above aggregate performance (5.2 percent). In 2023, the bank's home refinance lending in low-income tracts (10.0 percent) was above aggregate performance (5.9 percent). In 2024, the bank's home refinance lending in low-income tracts (14.3 percent) was above aggregate performance (5.4 percent).

Home refinance lending in moderate-income tracts is excellent. During the 2022-2024 review period, the bank's home refinance lending in moderate-income tracts (27.5 percent) was above the percentage of owner-occupied units (17.4 percent) in these tracts. In 2022, the bank's home refinance lending in moderate-income tracts (24.7 percent) was above aggregate performance (15.8 percent). In 2023, the bank's home refinance lending in moderate-income tracts (28.6 percent) was above aggregate performance (18.0 percent). In 2024, the bank's home refinance lending in moderate-income tracts (29.9 percent) was above aggregate performance (16.9 percent).

*Home Improvement Loans – Adequate*

Home improvement lending in low-income tracts is adequate. During the 2022-2024 review period, the bank's home improvement lending in low-income tracts (4.8 percent) was below the percentage of owner-occupied units (6.1 percent) in these tracts. In 2022, the bank's home improvement lending in low-income tracts (2.9 percent) was similar to aggregate performance (3.4 percent). In 2023, the bank's home improvement lending in low-income tracts (0.0 percent) was below aggregate performance (5.1 percent). In 2024, the bank's home improvement lending in low-income tracts (14.3 percent) was above aggregate performance (4.6 percent).

Home improvement lending in moderate-income tracts is adequate. During the 2022-2024 review period, the bank's home improvement lending in moderate-income tracts (16.1 percent) was below the percentage of owner-occupied units (17.4 percent) in these tracts. In 2022, the bank's home improvement lending in moderate-income tracts (14.3 percent) was similar to aggregate performance (13.5 percent). In 2023, the bank's home improvement lending in moderate-income tracts (15.4 percent) was similar to aggregate performance (15.1 percent). In 2024, the bank's home improvement lending in moderate-income tracts (21.4 percent) was above aggregate performance (15.3 percent).

*Small Business Loans – Good*

Small business lending in low-income tracts is poor. During the 2022-2024 review period, the bank's small business lending in low-income tracts (9.5 percent) was below the percentage of total businesses located in these tracts (15.0 percent). In 2022, the bank's small business lending in low-income tracts (8.6 percent) was below aggregate performance (12.8 percent). In 2023, the bank's small business lending in low-income tracts (11.6 percent) was similar to aggregate performance (12.3 percent). In 2024, the bank's small business lending in low-income tracts was 8.5 percent. Although 2024 aggregate data was not yet publicly available at the time of this CRA evaluation, this performance was similar to 2022 but below 2023.

Small business lending in moderate-income tracts is excellent. During the 2022-2024 review period, the bank's small business lending in moderate-income tracts (27.1 percent) was above the percentage of total businesses located in these tracts (18.0 percent). In 2022, the bank's small business lending in moderate-income tracts (27.6 percent) was above aggregate performance (15.8 percent). In 2023, the bank's small business lending in moderate-income tracts (29.5 percent) was above aggregate performance (15.1 percent). In 2024, the bank's small business lending in moderate-income tracts was 24.0 percent. Although 2024 aggregate data was not yet publicly available at the time of this CRA evaluation, this performance demonstrates continued responsiveness to AA needs.

No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. The bank had activity in nearly all of the AA census tracts throughout the review period, and maps did not indicate an absence of loans across LMI tracts.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues in the Huntsville AA is poor. As described in the following sections, overall performance for HMDA-reportable lending is poor while small business lending performance is adequate.

*Home Purchase Loans – Poor*

Home purchase lending to low-income borrowers is poor. During the 2022-2024 review period, the bank's home purchase lending to low-income borrowers (4.5 percent) was below the percentage of low-income families (23.1 percent) in the AA. In 2022, the bank's home purchase lending to low-income borrowers (4.3 percent) was below aggregate performance (5.7 percent). In 2023, the bank's home purchase lending to low-income borrowers (2.5 percent) was below aggregate performance (7.4 percent). In 2024, the bank's home purchase lending to low-income borrowers (7.0 percent) was below aggregate performance (8.2 percent).

Home purchase lending to moderate-income borrowers is poor. During the 2022-2024 review period, the bank's home purchase lending to moderate-income borrowers (12.3 percent) was below the percentage of moderate-income families (16.3 percent) in the AA. In 2022, the bank's home purchase lending to

moderate-income borrowers (7.7 percent) was below aggregate performance (16.4 percent). In 2023, the bank's home purchase lending to moderate-income borrowers (17.5 percent) was below aggregate performance (19.6 percent). In 2024, the bank's home purchase lending to moderate-income borrowers (14.1 percent) was below aggregate performance (21.2 percent).

*Home Refinance Loans – Poor*

Home refinance lending to low-income borrowers is poor. During the 2022-2024 review period, the bank's home refinance lending to low-income borrowers (8.1 percent) was below the percentage of low-income families (23.1 percent) in the AA. In 2022, the bank's home refinance lending to low-income borrowers (4.5 percent) was below aggregate performance (11.3 percent). In 2023, the bank's home refinance lending to low-income borrowers (10.0 percent) was below aggregate performance (15.2 percent). In 2024, the bank's home refinance lending to low-income borrowers (10.4 percent) was below aggregate performance (12.2 percent).

Home refinance lending to moderate-income borrowers is poor. During the 2022-2024 review period, the bank's home refinance lending to moderate-income borrowers (7.2 percent) was below the percentage of moderate-income families (16.3 percent) in the AA. In 2022, the bank's home refinance lending to moderate-income borrowers (5.6 percent) was below aggregate performance (19.6 percent). In 2023, the bank's home refinance lending to moderate-income borrowers (2.9 percent) was below aggregate performance (18.8 percent). In 2024, the bank's home refinance lending to moderate-income borrowers (13.0 percent) was below aggregate performance (17.0 percent).

*Home Improvement Loans – Adequate*

Home improvement lending to low-income borrowers is adequate. During the 2022-2024 review period, the bank's home improvement lending to low-income borrowers (8.1 percent) was below the percentage of low-income families (23.1 percent) in the AA. In 2022, the bank's home improvement lending to low-income borrowers (5.7 percent) was below aggregate performance (7.2 percent). In 2023, the bank's home improvement lending to low-income borrowers (0.0 percent) was below aggregate performance (10.9 percent). In 2024, the bank's home improvement lending to low-income borrowers (21.4 percent) was above aggregate performance (11.3 percent).

Home improvement lending to moderate-income borrowers is poor. During the 2022-2024 review period, the bank's home improvement lending to moderate-income borrowers (8.1 percent) was below the percentage of moderate-income families (16.3 percent) in the AA. In 2022, the bank's home improvement lending to moderate-income borrowers (8.6 percent) was below aggregate performance (17.2 percent). In 2023, the bank's home improvement lending to moderate-income borrowers (7.7 percent) was below aggregate performance (18.4 percent). In 2024, the bank's home improvement lending to moderate-income borrowers (7.1 percent) was below aggregate performance (18.4 percent).

*Small Business Loans – Adequate*

Small business lending to businesses of different sizes is adequate. During the 2022-2024 review period, the bank's small business lending to businesses with \$1 million or less in revenue (48.3 percent) was below the percentage of total businesses in the AA with revenues of \$1 million or less (93.2 percent). In 2022, the bank's small business lending to businesses with \$1 million or less in revenue (45.4 percent) was below aggregate performance (46.9 percent). In 2023, the bank's small business lending to businesses with revenues of \$1 million or less (51.9 percent) was above aggregate performance (49.9 percent). In 2024, the bank's small business lending to businesses with revenues of \$1 million or less was 48.1 percent. Although aggregate data was not yet publicly available at the time of this CRA evaluation, this was on par with 2022 and 2023 performance.

As stated above, the bank's small business lending to businesses with \$1 million or less in revenue was approximately consistent with aggregate performance during the review period, and as such represented adequate performance. However, the community contact mentioned that small businesses have experienced financing challenges in the AA, specifically pointing out a need for flexible lending standards (including consideration of mitigating factors) and greater availability of microloans (<\$50,000). These needs present an opportunity in the small business lending space for local banks, including Bank Independent.

#### CD Lending

The bank is a leader in making CD loans in the Huntsville AA. During the review period, the bank originated eight qualified CD loans totaling \$32.4 million in the AA. The loans qualified for a variety of CD purposes, primarily affordable housing for LMI individuals and revitalization and stabilization of LMI areas. Several of the loans were deemed responsive to AA needs and are described below.

- A \$24.1 million loan to finance the revitalization of a low-income census tract in Huntsville. This revitalization project will include the construction of a 100-room hotel, 70,000 square feet of restaurant and retail space, 20,000 square feet of office space, and 200 loft-style multifamily housing units.
- A \$1.5 million line of credit to repurpose an abandoned school building into office space in a West Huntsville low-income census tract. This project was consistent with the City of Huntsville's sustainable neighborhoods revitalization initiative and will attract businesses to this LMI area.
- A \$1.2 million loan renewal to provide continued financing for a 79-unit apartment complex. This apartment complex is located in a low-income tract and charges rental rates that are affordable to LMI families.

#### INVESTMENT TEST

The bank made a significant level of qualified CD investments and grants totaling \$1.2 million in the Huntsville AA. This amount includes five current period investments totaling \$1.1 million, no prior period investments still outstanding, and 31 donations totaling \$64,795.

Investment and donation types varied and addressed a range of CD needs. These include Mortgage-Backed Securities (MBS) supporting LMI borrowers, as well as donations supporting local schools and LMI-focused community organizations. The bank made rare use of innovative and/or complex investments to support CD initiatives. Additionally, the bank exhibits good responsiveness to credit and CD needs.

Examples of noteworthy investments and grants provided during the review period include:

- A \$10,000 donation to an organization focused on revitalizing the MidCity Huntsville area, which is located in a moderate-income tract.
- Four donations totaling \$8,700 to an organization that provides multigenerational education and support services to underserved communities and poverty-level individuals with the goal of addressing generational poverty in Huntsville.
- A \$1,500 donation to support a local community/technical college at which over 60 percent of students receive Pell Grant funds.

## SERVICE TEST

Retail banking services are reasonably accessible and do not vary in a way that inconveniences the Huntsville AA. Additionally, the bank provides an adequate level of CD services in the AA.

## Retail Banking Services

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the Huntsville AA. The distribution of the bank's branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the AA. The bank opened five branches and closed one branch during the review period, which improved the accessibility of its delivery systems. Hours of operation are generally 9 AM to 5 PM during the week, with several branches also open from 9 AM to 1 PM on Saturdays. The bank offers the same suite of products and services throughout its AA. Thus, hours and services do not vary in a way that inconveniences its AA.

The table below shows the distribution of branches and ATMs along with households and businesses by tract category.

**Geographic Distribution of Branches & ATMS**  
Assessment Area: AL Huntsville

Tract Category	Branches							ATMs										Demographics				
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%	Open	Closed				#	#	%	#	%	Open	Closed	#	%	Open	Closed	#	%		
	#	%	#	#	#	#	#	Total	#	%	#	%	Open	Closed	#	%	Open	Closed	#	%	%	%
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	15	12.7%	12.2%	15.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	2	25.0%	2	0	1	2	1	Total	1	12.5%	1	12.5%	1	0	0	0.0%	0	0	27	22.9%	19.5%	18.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	3	37.5%	0	0	3	3	2	Total	3	37.5%	3	37.5%	0	0	0	0.0%	0	0	35	29.7%	32.6%	27.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Upper	3	37.5%	3	1	2	3	2	Total	4	50.0%	4	50.0%	3	1	0	0.0%	0	0	40	33.9%	35.0%	37.3%
DTO	0		0	0	0			SA	1		1		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	0.8%	0.7%	2.7%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	8	100%	5	1	6	8	5	Total	8	100%	8	100%	4	1	0	0.0%	0	0	118	100%	100%	100%
DTO	0		0	0	0			SA	1		1		0	0	0		0	0				

Based on 2024 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

## CD Services

The bank provides an adequate level of CD services in the Huntsville AA. During the review period, bank employees provided 12 qualifying CD service activities totaling 249 hours to seven organizations operating throughout the AA. Bank staff provided financial services in a variety of ways, including memberships on boards of directors and advisory committees.

Noteworthy CD services include:

- A bank officer provided 102 hours of service as a board member for an organization that raises funds to support LMI members of the community, with a focus on education, financial stability, and health.
- A bank executive provided 30 hours of service as a board member for an organization focused on helping LMI women find gainful employment by providing education and vocational training.

- A bank executive provided 22 hours of service as a board member for an organization that assists children and families in high-poverty neighborhoods by addressing their education, social, health, and professional development needs.
- A bank officer provided 30 hours of service as a board member for a local economic development association tasked with recruiting new businesses and jobs to the area.

**METROPOLITAN AREA  
LIMITED-SCOPE REVIEW**

The following 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. Please refer to the tables in *Appendices F and G* for additional information regarding the AA.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DECATUR AA**

The Decatur AA includes Lawrence and Morgan counties, which comprise the Decatur, AL MSA. As of December 31, 2024, Bank Independent operated seven branches in the AA, which accounted for 20.6 percent of the institution's total branches. The bank held total deposits of \$543.5 million in the AA, which accounted for a 17.3 percent market share in the AA.

**CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS**

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

<b>Performance in the Limited-Scope Review Metropolitan AA</b>			
<b>AA</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
<b>Decatur</b>	Not Consistent (Below)	Not Consistent (Above)	Consistent

The key performance standards of the Lending Test for limited-scope areas include geographic distribution, borrower distribution, and CD loans. The geographic distribution of loans reflects adequate distribution throughout the Decatur AA. The distribution of loans based on borrower income or gross annual revenues in the Decatur AA is adequate. The bank did not make any qualifying CD loans in the Decatur AA during the review period.

Qualifying amounts and conclusions for investment and grant activity in the limited-scope MSA area were as follows: The bank made a significant level of qualified CD investments and grants totaling \$575,745 in the Decatur AA. This amount included three current period investments totaling \$530,810, no prior period investments still outstanding, and 43 donations totaling \$44,935.

The performance standards of the Service Test for the limited-scope MSA area include retail banking and CD services. Delivery systems are accessible to geographies and individuals of different income levels in the Decatur AA. The bank provides a relatively high level of CD services in the Decatur AA (13 qualified services for 284 hours during the review period).

Performance in the Decatur limited-scope AA did not impact overall performance for the state.



NONMETROPOLITAN STATEWIDE AREA  
LIMITED-SCOPE REVIEW

The following 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. Please refer to the tables in *Appendices F and G* for additional information regarding the AA.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FRANKLIN AA**

The Franklin AA is a non-MSA area that consists only of Franklin County, Alabama. As of December 31, 2024, Bank Independent operated four branches in the AA, which accounted for 11.8 percent of the institution’s total branches. The bank held total deposits of \$93.6 million in the AA, which accounted for 11.7 percent market share in the AA.

**CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS**

The following table compares conclusions regarding performance in the Franklin AA to the bank’s overall performance.

Performance in the Limited-Scope Review Nonmetropolitan AA			
AA	Lending Test	Investment Test	Service Test
Franklin	Not Consistent (Below)	Consistent	Not Consistent (Below)

The key performance standards of the Lending Test for limited-scope areas include geographic distribution, borrower distribution, and CD loans. The geographic distribution of loans reflects adequate distribution throughout the Franklin AA. The distribution of loans based on borrower income or gross annual revenues in the Franklin AA is poor. The bank did not make any qualifying CD loans in the Franklin AA during the review period.

Qualifying amounts and conclusions for the bank’s investment and grant activity in the limited-scope non-MSA area were as follows: The bank made an adequate level of qualified CD investments and grants totaling \$10,525 in the Franklin AA.

The performance standards of the Service Test for limited-scope MSA areas included retail banking and CD services. Delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the Franklin AA. The bank provides few, if any, CD services in the Franklin AA.

Performance in the Franklin limited-scope AA did not impact overall performance for the state.

**APPENDIX A – SCOPE OF EXAMINATION**

TIME PERIOD REVIEWED			
January 1, 2022 to December 31, 2024 - Lending and Service Tests (non-CD)			
October 1, 2022 to December 31, 2024 – CD Loans, Investments, and Services			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Bank Independent, Sheffield, Alabama		HMDA-Reportable and Small Business Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREAS	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Florence-Muscle Shoals MSA (Lauderdale and Colbert counties)	Full-scope review	N/A	N/A
Huntsville MSA (Limestone and Madison counties)	Full-scope review	N/A	N/A
Decatur MSA (Morgan and Lawrence counties)	Limited-scope review	N/A	N/A
Franklin County (non-MSA)	Limited-scope review	N/A	N/A

## 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 Bank Independent prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **July 14, 2025**. 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).

## APPENDIX C – GLOSSARY (Continued)

**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).

**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.

## APPENDIX C – GLOSSARY (Continued)

**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.

**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: AL Florence

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	7.3%	871	2.3%	310	35.6%	7,943	20.6%
Moderate-income	8	19.5%	6,506	16.9%	1,016	15.6%	7,162	18.6%
Middle-income	21	51.2%	22,249	57.8%	1,770	8.0%	8,261	21.4%
Upper-income	8	19.5%	8,630	22.4%	540	6.3%	15,155	39.3%
Unknown-income	1	2.4%	265	0.7%	170	64.2%	0	0.0%
Total Assessment Area	41	100.0%	38,521	100.0%	3,806	9.9%	38,521	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,779	857	2.0%	30.8%	1,379	49.6%	543	19.5%
Moderate-income	14,999	6,147	14.7%	41.0%	5,952	39.7%	2,900	19.3%
Middle-income	39,537	24,768	59.2%	62.6%	8,519	21.5%	6,250	15.8%
Upper-income	13,670	9,922	23.7%	72.6%	2,159	15.8%	1,589	11.6%
Unknown-income	1,014	124	0.3%	12.2%	483	47.6%	407	40.1%
Total Assessment Area	71,999	41,818	100.0%	58.1%	18,492	25.7%	11,689	16.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	590	11.8%	523	11.4%	59	16.0%	8	12.3%
Moderate-income	843	16.8%	770	16.8%	61	16.6%	12	18.5%
Middle-income	2,730	54.6%	2,510	54.9%	186	50.5%	34	52.3%
Upper-income	816	16.3%	744	16.3%	62	16.8%	10	15.4%
Unknown-income	25	0.5%	24	0.5%	0	0.0%	1	1.5%
Total Assessment Area	5,004	100.0%	4,571	100.0%	368	100.0%	65	100.0%
	Percentage of Total Businesses:			91.3%		7.4%		1.3%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	1.4%	1	0.7%	1	25.0%	0	0.0%
Moderate-income	13	9.4%	13	9.6%	0	0.0%	0	0.0%
Middle-income	90	64.7%	87	64.4%	3	75.0%	0	0.0%
Upper-income	34	24.5%	34	25.2%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	139	100.0%	135	100.0%	4	100.0%	0	0.0%
	Percentage of Total Farms:			97.1%		2.9%		0.0%

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

## Combined Demographics Report

### Assessment Area: AL Huntsville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	12.7%	11,287	9.5%	3,502	31.0%	27,496	23.1%
Moderate-income	27	22.9%	21,738	18.2%	2,223	10.2%	19,391	16.3%
Middle-income	35	29.7%	41,474	34.8%	2,681	6.5%	23,297	19.5%
Upper-income	40	33.9%	44,421	37.2%	1,552	3.5%	49,073	41.1%
Unknown-income	1	0.8%	337	0.3%	131	38.9%	0	0.0%
Total Assessment Area	118	100.0%	119,257	100.0%	10,089	8.5%	119,257	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	25,662	7,758	6.1%	30.2%	14,746	57.5%	3,158	12.3%
Moderate-income	39,937	22,290	17.4%	55.8%	13,646	34.2%	4,001	10.0%
Middle-income	64,816	44,713	35.0%	69.0%	15,430	23.8%	4,673	7.2%
Upper-income	68,616	52,943	41.4%	77.2%	11,588	16.9%	4,085	6.0%
Unknown-income	1,347	82	0.1%	6.1%	1,157	85.9%	108	8.0%
Total Assessment Area	200,378	127,786	100.0%	63.8%	56,567	28.2%	16,025	8.0%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,891	15.0%	2,627	14.7%	252	21.8%	12	8.1%
Moderate-income	3,463	18.0%	3,207	17.9%	231	19.9%	25	16.9%
Middle-income	5,186	27.0%	4,944	27.6%	198	17.1%	44	29.7%
Upper-income	7,173	37.3%	6,755	37.7%	356	30.7%	62	41.9%
Unknown-income	517	2.7%	391	2.2%	121	10.4%	5	3.4%
Total Assessment Area	19,230	100.0%	17,924	100.0%	1,158	100.0%	148	100.0%
	Percentage of Total Businesses:			93.2%		6.0%		0.8%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7	2.2%	7	2.3%	0	0.0%	0	0.0%
Moderate-income	65	20.6%	62	20.3%	3	30.0%	0	0.0%
Middle-income	149	47.2%	145	47.4%	4	40.0%	0	0.0%
Upper-income	91	28.8%	89	29.1%	2	20.0%	0	0.0%
Unknown-income	4	1.3%	3	1.0%	1	10.0%	0	0.0%
Total Assessment Area	316	100.0%	306	100.0%	10	100.0%	0	0.0%
	Percentage of Total Farms:			96.8%		3.2%		0.0%

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



## APPENDIX E – FULL SCOPE LENDING TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Florence

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	%	\$ %		
HOME PURCHASE	Low	11	2.0%	925	0.7%	2.0%	4	2.1%	0.8%	286	0.7%	0.3%	2	1.3%	1.4%	142	0.4%	0.7%	5	2.4%	1.7%	497	1.0%	0.9%
	Moderate	119	21.4%	19,513	15.4%	14.7%	41	21.8%	18.3%	5,713	14.5%	14.4%	35	22.2%	18.0%	5,439	13.8%	13.6%	43	20.6%	19.1%	8,361	17.5%	14.5%
	Middle	301	54.2%	71,336	56.4%	59.2%	103	54.8%	60.7%	23,836	60.5%	61.1%	84	53.2%	59.5%	20,738	52.7%	62.1%	114	54.5%	60.2%	26,762	56.0%	63.2%
	Upper	120	21.6%	34,471	27.3%	23.7%	37	19.7%	19.9%	9,385	23.8%	24.1%	37	23.4%	20.7%	13,002	33.1%	23.4%	46	22.0%	18.6%	12,084	25.3%	21.3%
	Unknown	4	0.7%	237	0.2%	0.3%	3	1.6%	0.3%	168	0.4%	0.1%	0	0.0%	0.4%	0	0.0%	0.2%	1	0.5%	0.3%	69	0.1%	0.1%
	Total	555	100%	126,482	100%	100.0%	188	100%	100%	39,388	100%	100%	158	100%	100%	39,321	100%	100%	209	100%	100%	47,773	100%	100%
REFINANCE	Low	13	2.0%	572	0.8%	2.0%	5	1.8%	1.9%	202	0.6%	0.7%	3	1.6%	1.2%	141	0.7%	1.3%	5	2.6%	1.6%	229	1.2%	0.8%
	Moderate	99	15.1%	7,132	9.8%	14.7%	45	16.1%	14.4%	3,903	11.4%	12.0%	23	12.3%	15.3%	1,612	8.1%	12.7%	31	16.3%	14.6%	1,617	8.7%	10.0%
	Middle	385	58.7%	42,053	57.9%	59.2%	156	55.9%	60.7%	19,201	56.1%	60.9%	116	62.0%	60.7%	11,237	56.7%	62.4%	113	59.5%	62.0%	11,615	62.5%	64.5%
	Upper	152	23.2%	22,336	30.8%	23.7%	70	25.1%	22.8%	10,687	31.2%	26.2%	44	23.5%	22.6%	6,799	34.3%	23.5%	38	20.0%	21.4%	4,850	26.1%	24.5%
	Unknown	7	1.1%	516	0.7%	0.3%	3	1.1%	0.2%	212	0.6%	0.2%	1	0.5%	0.2%	45	0.2%	0.1%	3	1.6%	0.3%	259	1.4%	0.2%
	Total	656	100%	72,609	100%	100.0%	279	100%	100%	34,205	100%	100%	187	100%	100%	19,834	100%	100%	190	100%	100%	18,570	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.0%	0	0.0%	0.9%	0	0.0%	0.9%	0	0.0%	1.8%	0	0.0%	1.2%	0	0.0%	1.8%	0	0.0%	1.5%
	Moderate	20	17.2%	826	11.8%	14.7%	6	14.6%	16.3%	218	8.8%	14.2%	7	15.9%	15.6%	308	14.4%	12.2%	7	22.6%	17.3%	300	12.6%	11.5%
	Middle	72	62.1%	4,365	62.3%	59.2%	28	68.3%	65.2%	1,896	76.4%	65.9%	28	63.6%	61.5%	1,219	56.9%	66.6%	16	51.6%	59.5%	1,250	52.4%	58.1%
	Upper	22	19.0%	1,671	23.8%	23.7%	6	14.6%	17.2%	280	11.3%	18.4%	8	18.2%	20.2%	556	25.9%	19.1%	8	25.8%	20.9%	835	35.0%	28.8%
	Unknown	2	1.7%	149	2.1%	0.3%	1	2.4%	0.4%	89	3.6%	0.6%	1	2.3%	0.9%	60	2.8%	0.9%	0	0.0%	0.5%	0	0.0%	0.2%
	Total	116	100%	7,011	100%	100.0%	41	100%	100%	2,483	100%	100%	44	100%	100%	2,143	100%	100%	31	100%	100%	2,385	100%	100%
MULTI FAMILY	Multi-Family Units																							
	Low	4	11.4%	1,645	7.7%	5.2%	4	21.1%	10.2%	1,645	17.4%	6.0%	0	0.0%	9.1%	0	0.0%	14.7%	0	0.0%	4.5%	0	0.0%	0.8%
	Moderate	16	45.7%	11,443	53.6%	32.1%	8	42.1%	32.7%	4,023	42.5%	37.1%	2	33.3%	31.8%	1,471	30.7%	41.2%	6	60.0%	45.5%	5,949	84.3%	45.5%
	Middle	14	40.0%	7,577	35.5%	50.4%	7	36.8%	44.9%	3,808	40.2%	49.9%	4	66.7%	54.5%	3,325	69.3%	37.3%	3	30.0%	40.9%	444	6.3%	48.2%
	Upper	1	2.9%	666	3.1%	11.8%	0	0.0%	12.2%	0	0.0%	7.1%	0	0.0%	0.0%	0	0.0%	0.0%	1	10.0%	9.1%	666	9.4%	5.5%
	Unknown	0	0.0%	0	0.0%	0.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.5%	0	0.0%	6.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	35	100%	21,331	100%	100.0%	19	100%	100%	9,476	100%	100%	6	100%	100%	4,796	100%	100%	10	100%	100%	7,059	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.7%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	1.6%
	Moderate	12	9.1%	965	8.4%	14.7%	7	11.9%	13.3%	755	15.1%	10.7%	1	3.0%	11.9%	40	1.2%	5.9%	4	10.0%	15.5%	170	5.2%	10.1%
	Middle	90	68.2%	7,626	66.4%	59.2%	39	66.1%	61.3%	3,017	60.5%	51.6%	28	84.8%	65.0%	2,722	83.5%	67.0%	23	57.5%	61.3%	1,887	58.3%	62.9%
	Upper	30	22.7%	2,895	25.2%	23.7%	13	22.0%	25.4%	1,214	24.3%	37.7%	4	12.1%	22.4%	499	15.3%	26.6%	13	32.5%	22.7%	1,182	36.5%	25.4%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	132	100%	11,486	100%	100.0%	59	100%	100%	4,986	100%	100%	33	100%	100%	3,261	100%	100%	40	100%	100%	3,239	100%	100%

Originations &amp; Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Florence

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units	Count			Dollar		Count			Dollar		Count			Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
		#	%	\$ (000s)	%														%	%	%	%	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	2.3%	90	2.4%	2.0%	0	0.0%	1.5%	0	0.0%	0.4%	0	0.0%	1.0%	0	0.0%	0.7%	1	7.7%	1.1%	90	8.4%	1.0%
	Moderate	6	14.0%	148	3.9%	14.7%	1	5.0%	13.2%	19	1.5%	12.6%	1	10.0%	15.3%	31	2.1%	8.9%	4	30.8%	18.7%	98	9.1%	13.8%
	Middle	20	46.5%	1,759	46.0%	59.2%	10	50.0%	57.4%	406	31.9%	49.5%	6	60.0%	61.2%	989	66.9%	67.7%	4	30.8%	59.3%	364	34.0%	48.2%
	Upper	16	37.2%	1,827	47.8%	23.7%	9	45.0%	27.9%	848	66.6%	37.4%	3	30.0%	22.4%	459	31.0%	22.8%	4	30.8%	20.9%	520	48.5%	37.0%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	43	100%	3,824	100%	100.0%	20	100%	100%	1,273	100%	100%	10	100%	100%	1,479	100%	100%	13	100%	100%	1,072	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.0%	0	0.0%	7.1%	0	0.0%	4.0%	0	0.0%	16.7%	0	0.0%	15.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	14.7%	0	0.0%	35.7%	0	0.0%	30.7%	0	0.0%	16.7%	0	0.0%	14.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	50.0%	0	0.0%	53.5%	0	0.0%	50.0%	0	0.0%	53.1%	0	0.0%	40.0%	0	0.0%	33.3%
	Upper	0	0.0%	0	0.0%	23.7%	0	0.0%	7.1%	0	0.0%	11.8%	0	0.0%	16.7%	0	0.0%	16.2%	0	0.0%	60.0%	0	0.0%	66.7%
	Unknown	0	0.0%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	29	1.9%	3,232	1.3%	2.0%	13	2.1%	1.3%	2,133	2.3%	0.7%	5	1.1%	1.4%	283	0.4%	1.3%	11	2.2%	1.6%	816	1.0%	0.9%
	Moderate	272	17.7%	40,027	16.5%	14.7%	108	17.8%	16.8%	14,631	15.9%	14.4%	69	15.8%	16.9%	8,901	12.6%	14.0%	95	19.3%	17.7%	16,495	20.6%	14.2%
	Middle	882	57.4%	134,716	55.5%	59.2%	343	56.6%	60.7%	52,164	56.8%	60.4%	266	60.7%	60.2%	40,230	56.8%	61.6%	273	55.4%	60.6%	42,322	52.8%	62.7%
	Upper	341	22.2%	63,866	26.3%	23.7%	135	22.3%	21.0%	22,414	24.4%	24.4%	96	21.9%	21.2%	21,315	30.1%	22.6%	110	22.3%	19.8%	20,137	25.1%	22.1%
	Unknown	13	0.8%	902	0.4%	0.3%	7	1.2%	0.3%	469	0.5%	0.1%	2	0.5%	0.4%	105	0.1%	0.4%	4	0.8%	0.3%	328	0.4%	0.1%
	Total	1,537	100%	242,743	100%	100.0%	606	100%	100%	91,811	100%	100%	438	100%	100%	70,834	100%	100%	493	100%	100%	80,098	100%	100%

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: AL Florence

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending															
		2022, 2023, 2024					2022					2023					2024					
		Bank				Total Businesses	Count			Dollar		Count			Dollar		Count		Dollar			
		Count	Dollar		%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	#		%											%	\$ 000s	\$ %	#	%	%
SMALL BUSINESSES	Low	91	12.9%	14,918	14.6%	11.8%	31	12.0%	8.6%	6,697	17.4%	12.4%	36	15.0%	8.8%	4,368	13.1%	10.9%	24	11.5%	3,853	12.8%
	Moderate	135	19.1%	19,645	19.3%	16.8%	45	17.4%	14.3%	6,155	16.0%	12.6%	45	18.8%	14.5%	6,228	18.6%	15.6%	45	21.6%	7,262	24.2%
	Middle	348	49.3%	47,841	46.9%	54.6%	132	51.2%	57.6%	19,573	50.8%	56.6%	113	47.1%	55.9%	14,809	44.3%	52.5%	103	49.5%	13,459	44.9%
	Upper	132	18.7%	19,602	19.2%	16.3%	50	19.4%	18.7%	6,130	15.9%	17.5%	46	19.2%	19.9%	8,053	24.1%	20.7%	36	17.3%	5,419	18.1%
	Unknown	0	0.0%	0	0.0%	0.5%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.6%	0	0.0%	0.9%	0	0.0%	0.7%	0	0.0%	0.3%	0	0.0%	0	0.0%
	Total	706	100%	102,006	100%	100.0%	258	100%	100%	38,555	100%	100%	240	100%	100%	33,458	100%	100%	208	100%	29,993	100%
SMALL FARM						Total Farms																
	Low	0	0.0%	0	0.0%	1.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.3%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Moderate	3	6.0%	420	11.9%	9.4%	1	5.9%	5.9%	120	8.3%	15.8%	1	5.6%	2.6%	150	10.1%	5.4%	1	6.7%	150	25.1%
	Middle	44	88.0%	3,038	86.2%	64.7%	15	88.2%	81.2%	1,312	90.7%	76.7%	15	83.3%	73.7%	1,278	86.3%	82.5%	14	93.3%	448	74.9%
	Upper	3	6.0%	68	1.9%	24.5%	1	5.9%	12.9%	15	1.0%	7.5%	2	11.1%	21.1%	53	3.6%	11.8%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.3%	0	0.0%	0.1%	0	0.0%	0	0.0%
Total	50	100%	3,526	100%	100.0%	17	100%	100%	1,447	100%	100%	18	100%	100%	1,481	100%	100%	15	100%	598	100%	

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Florence

Product Type	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank			Families by Family Income	Count		Dollar			Count			Dollar			Count			Dollar				
		Count	%	\$ (000s)		%	\$	\$	%	%	\$	%	%	\$ (000s)	%	%	%	\$	%	%				
HOME PURCHASE	Low	38	6.8%	3,881	3.1%	20.6%	12	6.4%	5.9%	1,268	3.2%	2.8%	8	5.1%	5.8%	548	1.4%	2.7%	18	8.6%	6.3%	2,065	4.3%	3.1%
	Moderate	82	14.8%	12,937	10.2%	18.6%	25	13.3%	18.2%	3,888	9.9%	12.8%	16	10.1%	18.3%	2,308	5.9%	12.2%	41	19.6%	18.0%	6,741	14.1%	12.3%
	Middle	102	18.4%	20,452	16.2%	21.4%	32	17.0%	19.6%	6,149	15.6%	17.7%	25	15.8%	20.6%	4,662	11.9%	17.8%	45	21.5%	22.0%	9,641	20.2%	19.8%
	Upper	261	47.0%	76,141	60.2%	39.3%	92	48.9%	35.4%	23,292	59.1%	47.8%	87	55.1%	34.6%	27,243	69.3%	45.3%	82	39.2%	27.7%	25,606	53.6%	38.9%
	Unknown	72	13.0%	13,071	10.3%	0.0%	27	14.4%	21.0%	4,791	12.2%	18.9%	22	13.9%	20.8%	4,560	11.6%	22.0%	23	11.0%	26.0%	3,720	7.8%	25.9%
	Total	555	100%	126,482	100%	100.0%	188	100%	100%	39,388	100%	100%	158	100%	100%	39,321	100%	100%	209	100%	100%	47,773	100%	100%
REFINANCE	Low	89	13.6%	4,122	5.7%	20.6%	27	9.7%	8.6%	1,545	4.5%	4.0%	29	15.5%	9.6%	1,126	5.7%	4.3%	33	17.4%	8.9%	1,451	7.8%	4.2%
	Moderate	96	14.6%	6,427	8.9%	18.6%	37	13.3%	15.9%	3,051	8.9%	10.0%	28	15.0%	15.7%	1,652	8.3%	10.7%	31	16.3%	15.4%	1,724	9.3%	8.7%
	Middle	116	17.7%	9,922	13.7%	21.4%	53	19.0%	21.6%	4,944	14.5%	17.5%	27	14.4%	22.2%	1,754	8.8%	19.1%	36	18.9%	21.9%	3,224	17.4%	15.8%
	Upper	287	43.8%	42,521	58.6%	39.3%	129	46.2%	36.4%	19,272	56.3%	45.4%	83	44.4%	40.1%	12,674	63.9%	49.4%	75	39.5%	32.4%	10,575	56.9%	38.6%
	Unknown	68	10.4%	9,617	13.2%	0.0%	33	11.8%	17.4%	5,393	15.8%	23.1%	20	10.7%	12.4%	2,628	13.2%	16.5%	15	7.9%	21.4%	1,596	8.6%	32.6%
	Total	656	100%	72,609	100%	100.0%	279	100%	100%	34,205	100%	100%	187	100%	100%	19,834	100%	100%	190	100%	100%	18,570	100%	100%
HOME IMPROVEMENT	Low	8	6.9%	261	3.7%	20.6%	3	7.3%	9.0%	170	6.8%	6.3%	3	6.8%	8.7%	51	2.4%	5.8%	2	6.5%	10.5%	40	1.7%	3.4%
	Moderate	13	11.2%	447	6.4%	18.6%	5	12.2%	12.4%	167	6.7%	10.0%	7	15.9%	16.1%	266	12.4%	11.6%	1	3.2%	13.6%	14	0.6%	6.2%
	Middle	26	22.4%	1,207	17.2%	21.4%	10	24.4%	24.5%	482	19.4%	24.2%	8	18.2%	21.6%	348	16.2%	17.1%	8	25.8%	20.9%	377	15.8%	15.8%
	Upper	62	53.4%	4,388	62.6%	39.3%	21	51.2%	51.5%	1,304	52.5%	54.9%	22	50.0%	46.8%	1,180	55.1%	58.5%	19	61.3%	47.7%	1,904	79.8%	63.2%
	Unknown	7	6.0%	708	10.1%	0.0%	2	4.9%	2.6%	360	14.5%	4.6%	4	9.1%	6.9%	298	13.9%	7.0%	1	3.2%	7.3%	50	2.1%	11.4%
	Total	116	100%	7,011	100%	100.0%	41	100%	100%	2,483	100%	100%	44	100%	100%	2,143	100%	100%	31	100%	100%	2,385	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.5%	0	0.0%	0.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	2	5.7%	319	1.5%	39.3%	2	10.5%	6.1%	319	3.4%	1.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	33	94.3%	21,012	98.5%	0.0%	17	89.5%	93.9%	9,157	96.6%	98.5%	6	100.0%	95.5%	4,796	100.0%	99.1%	10	100.0%	100.0%	7,059	100.0%	100.0%
	Total	35	100%	21,331	100%	100.0%	19	100%	100%	9,476	100%	100%	6	100%	100%	4,796	100%	100%	10	100%	100%	7,059	100%	100%
OTHER PURPOSE LOC	Low	5	3.8%	226	2.0%	20.6%	4	6.8%	5.2%	206	4.1%	2.8%	0	0.0%	6.3%	0	0.0%	2.3%	1	2.5%	4.4%	20	0.6%	2.9%
	Moderate	14	10.6%	542	4.7%	18.6%	8	13.6%	13.3%	370	7.4%	8.5%	5	15.2%	16.8%	117	3.6%	9.2%	1	2.5%	12.7%	55	1.7%	8.3%
	Middle	19	14.4%	1,356	11.8%	21.4%	5	8.5%	18.5%	549	11.0%	12.6%	5	15.2%	21.0%	225	6.9%	13.3%	9	22.5%	21.0%	582	18.0%	14.7%
	Upper	87	65.9%	9,042	78.7%	39.3%	42	71.2%	61.8%	3,861	77.4%	74.1%	20	60.6%	49.7%	2,739	84.0%	70.3%	25	62.5%	58.0%	2,442	75.4%	72.0%
	Unknown	7	5.3%	320	2.8%	0.0%	0	0.0%	1.2%	0	0.0%	2.0%	3	9.1%	6.3%	180	5.5%	4.9%	4	10.0%	3.9%	140	4.3%	2.1%
	Total	132	100%	11,486	100%	100.0%	59	100%	100%	4,986	100%	100%	33	100%	100%	3,261	100%	100%	40	100%	100%	3,239	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Florence

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			Count			Dollar			
		Count	Dollar			Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	10	23.3%	536	14.0%	20.6%	5	25.0%	13.2%	104	8.2%	3.4%	1	10.0%	6.1%	203	13.7%	5.3%	4	30.8%	13.2%	229	21.4%	8.9%
	Moderate	11	25.6%	559	14.6%	18.6%	6	30.0%	22.1%	329	25.8%	12.9%	1	10.0%	17.3%	46	3.1%	13.9%	4	30.8%	22.0%	184	17.2%	12.9%
	Middle	6	14.0%	419	11.0%	21.4%	4	20.0%	22.1%	263	20.7%	21.0%	2	20.0%	25.5%	156	10.5%	18.7%	0	0.0%	22.0%	0	0.0%	18.1%
	Upper	14	32.6%	2,257	59.0%	39.3%	5	25.0%	33.8%	577	45.3%	54.8%	5	50.0%	42.9%	1,030	69.6%	52.1%	4	30.8%	36.3%	650	60.6%	53.5%
	Unknown	2	4.7%	53	1.4%	0.0%	0	0.0%	8.8%	0	0.0%	7.8%	1	10.0%	8.2%	44	3.0%	10.0%	1	7.7%	6.6%	9	0.8%	6.6%
	Total	43	100%	3,824	100%	100.0%	20	100%	100%	1,273	100%	100%	10	100%	100%	1,479	100%	100%	13	100%	100%	1,072	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	16.7%	0	0.0%	21.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	39.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	83.3%	0	0.0%	78.3%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	150	9.8%	9,026	3.7%	20.6%	51	8.4%	7.0%	3,293	3.6%	3.1%	41	9.4%	7.1%	1,928	2.7%	3.1%	58	11.8%	7.3%	3,805	4.8%	3.3%
	Moderate	216	14.1%	20,912	8.6%	18.6%	81	13.4%	16.7%	7,805	8.5%	11.3%	57	13.0%	17.2%	4,389	6.2%	11.4%	78	15.8%	16.7%	8,718	10.9%	10.8%
	Middle	269	17.5%	33,356	13.7%	21.4%	104	17.2%	20.3%	12,387	13.5%	17.0%	67	15.3%	21.1%	7,145	10.1%	17.4%	98	19.9%	21.7%	13,824	17.3%	17.9%
	Upper	713	46.4%	134,668	55.5%	39.3%	291	48.0%	37.0%	48,625	53.0%	45.9%	217	49.5%	37.4%	44,866	63.3%	45.6%	205	41.6%	31.6%	41,177	51.4%	38.9%
	Unknown	189	12.3%	44,781	18.4%	0.0%	79	13.0%	18.9%	19,701	21.5%	22.7%	56	12.8%	17.3%	12,506	17.7%	22.4%	54	11.0%	22.7%	12,574	15.7%	29.1%
	Total	1,537	100%	242,743	100%	100.0%	606	100%	100%	91,811	100%	100%	438	100%	100%	70,834	100%	100%	493	100%	100%	80,098	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: AL Florence

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending																
			2022, 2023, 2024					2022					2023					2024						
			Bank				Total Businesses	Count			Dollar		Agg \$ %	Count			Dollar		Agg \$ %	Count			Dollar	
			Count	%	\$ (000s)	\$ %		Bank	%	Agg %	\$ 000s	\$ %		Bank	%	Agg %	\$ 000s	\$ %		Agg \$ %	Bank	%	\$ 000s	\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	385	54.5%	31,243	30.6%	91.3%	142	55.0%	53.3%	13,292	34.5%	34.8%	135	56.3%	54.2%	9,795	29.3%	34.4%	108	51.9%	8,156	27.2%	
		Over \$1 Million	306	43.3%	68,951	67.6%	7.4%	111	43.0%		24,860	64.5%		100	41.7%		22,290	66.6%		95	45.7%	21,801	72.7%	
		Total Rev. available	691	97.9%	100,194	98.2%	98.7%	253	98.1%		38,152	99.0%		235	97.9%		32,085	95.9%		203	97.6%	29,957	99.9%	
		Rev. Not Known	15	2.1%	1,812	1.8%	1.3%	5	1.9%		403	1.0%		5	2.1%		1,373	4.1%		5	2.4%	36	0.1%	
		Total	706	100%	102,006	100%	100%	258	100%		38,555	100%			240	100%		33,458		100%		208	100%	29,993
	Loan Size	\$100,000 or Less	438	62.0%	19,019	18.6%		150	58.1%	87.4%	6,375	16.5%	25.5%	154	64.2%	88.6%	6,743	20.2%	29.8%	134	64.4%	5,901	19.7%	
		\$100,001 - \$250,000	154	21.8%	28,136	27.6%		65	25.2%	7.4%	11,812	30.6%	25.1%	50	20.8%	6.7%	9,243	27.6%	24.2%	39	18.8%	7,081	23.6%	
		\$250,001 - \$1 Million	114	16.1%	54,851	53.8%		43	16.7%	5.2%	20,368	52.8%	49.4%	36	15.0%	4.7%	17,472	52.2%	46.0%	35	16.8%	17,011	56.7%	
		Total	706	100%	102,006	100%		258	100%	100%	38,555	100%	100%	240	100%	100%	33,458	100%	100%	208	100%	29,993	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	304	79.0%	12,287	39.3%		105	73.9%		4,044	30.4%		111	82.2%		4,586	46.8%		88	81.5%	3,657	44.8%	
		\$100,001 - \$250,000	58	15.1%	9,544	30.5%		25	17.6%		4,168	31.4%		19	14.1%		3,175	32.4%		14	13.0%	2,201	27.0%	
		\$250,001 - \$1 Million	23	6.0%	9,412	30.1%		12	8.5%		5,080	38.2%		5	3.7%		2,034	20.8%		6	5.6%	2,298	28.2%	
		Total	385	100%	31,243	100%		142	100%		13,292	100%		135	100%		9,795	100%		108	100%	8,156	100%	
SMALL FARM	Revenue	\$1 Million or Less	43	86.0%	2,813	79.8%	97.1%	15	88.2%	34.1%	1,362	94.1%	40.7%	14	77.8%	35.5%	877	59.2%	44.1%	14	93.3%	574	96.0%	
		Over \$1 Million	4	8.0%	649	18.4%	2.9%	1	5.9%		65	4.5%		3	16.7%		584	39.4%		0	0.0%	0	0.0%	
		Total Rev. available	47	94.0%	3,462	98.2%	100.0%	16	94.1%		1,427	98.6%		17	94.4%		1,461	98.6%		14	93.3%	574	96.0%	
		Not Known	3	6.0%	64	1.8%	0.0%	1	5.9%		20	1.4%		1	5.6%		20	1.4%		1	6.7%	24	4.0%	
		Total	50	100%	3,526	100%	100%	17	100%		1,447	100%		18	100%		1,481	100%		15	100%	598	100%	
	Loan Size	\$100,000 or Less	38	76.0%	978	27.7%		12	70.6%	87.1%	282	19.5%	35.7%	13	72.2%	86.8%	388	26.2%	35.7%	13	86.7%	308	51.5%	
		\$100,001 - \$250,000	7	14.0%	1,055	29.9%		2	11.8%	4.7%	229	15.8%	12.7%	3	16.7%	10.5%	536	36.2%	45.2%	2	13.3%	290	48.5%	
		\$250,001 - \$500,000	5	10.0%	1,493	42.3%		3	17.6%	8.2%	936	64.7%	51.7%	2	11.1%	2.6%	557	37.6%	19.2%	0	0.0%	0	0.0%	
		Total	50	100%	3,526	100%		17	100%	100%	1,447	100%	100%	18	100%	100%	1,481	100%	100%	15	100%	598	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	33	76.7%	799	28.4%		10	66.7%		197	14.5%		11	78.6%		318	36.3%		12	85.7%	284	49.5%	
		\$100,001 - \$250,000	6	14.0%	809	28.8%		2	13.3%		229	16.8%		2	14.3%		290	33.1%		2	14.3%	290	50.5%	
		\$250,001 - \$500,000	4	9.3%	1,205	42.8%		3	20.0%		936	68.7%		1	7.1%		269	30.7%		0	0.0%	0	0.0%	
		Total	43	100%	2,813	100%		15	100%		1,362	100%		14	100%		877	100%		14	100%	574	100%	

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Huntsville

Product Type	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Agg %	Bank \$ (000s)	%	Agg \$ %
HOME PURCHASE	Low	22	8.2%	3,758	4.8%	6.1%	6	5.1%	4.6%	1,155	3.3%	2.6%	10	12.5%	4.8%	1,885	8.3%	3.0%	6	8.5%	4.6%	718	3.6%	3.0%
	Moderate	65	24.3%	17,054	22.0%	17.4%	28	23.9%	15.6%	6,758	19.5%	12.8%	14	17.5%	15.9%	3,754	16.5%	13.2%	23	32.4%	15.3%	6,542	32.4%	12.6%
	Middle	103	38.4%	28,167	36.3%	35.0%	48	41.0%	39.9%	12,413	35.8%	39.1%	30	37.5%	38.7%	8,154	35.8%	37.3%	25	35.2%	40.9%	7,600	37.7%	39.3%
	Upper	78	29.1%	28,641	36.9%	41.4%	35	29.9%	39.8%	14,359	41.4%	45.5%	26	32.5%	40.4%	8,972	39.4%	46.4%	17	23.9%	39.1%	5,310	26.3%	45.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%
	Total	268	100%	77,620	100%	100.0%	117	100%	100%	34,685	100%	100%	80	100%	100%	22,765	100%	100%	71	100%	100%	20,170	100%	100%
REFINANCE	Low	34	14.4%	4,479	10.5%	6.1%	16	18.0%	5.2%	2,071	10.5%	2.8%	7	10.0%	5.9%	706	6.0%	3.5%	11	14.3%	5.4%	1,702	15.1%	3.6%
	Moderate	65	27.5%	7,669	18.0%	17.4%	22	24.7%	15.8%	2,813	14.3%	12.5%	20	28.6%	18.0%	2,575	22.0%	14.9%	23	29.9%	16.9%	2,281	20.2%	14.4%
	Middle	79	33.5%	13,253	31.1%	35.0%	29	32.6%	37.5%	6,580	33.5%	36.6%	24	34.3%	37.2%	3,455	29.5%	35.1%	26	33.8%	37.1%	3,218	28.5%	35.2%
	Upper	58	24.6%	17,259	40.5%	41.4%	22	24.7%	41.6%	8,189	41.7%	48.0%	19	27.1%	38.9%	4,984	42.5%	46.6%	17	22.1%	40.5%	4,086	36.2%	46.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%
	Total	236	100%	42,660	100%	100.0%	89	100%	100%	19,653	100%	100%	70	100%	100%	11,720	100%	100%	77	100%	100%	11,287	100%	100%
HOME IMPROVEMENT	Low	3	4.8%	420	6.1%	6.1%	1	2.9%	3.4%	150	3.5%	2.5%	0	0.0%	5.1%	0	0.0%	4.2%	2	14.3%	4.6%	270	19.7%	3.2%
	Moderate	10	16.1%	1,058	15.3%	17.4%	5	14.3%	13.5%	680	15.8%	11.6%	2	15.4%	15.1%	71	5.7%	13.2%	3	21.4%	15.3%	307	22.3%	12.7%
	Middle	31	50.0%	2,875	41.6%	35.0%	17	48.6%	36.1%	1,793	41.8%	34.1%	6	46.2%	36.3%	360	28.8%	32.9%	8	57.1%	34.6%	722	52.5%	33.1%
	Upper	18	29.0%	2,562	37.0%	41.4%	12	34.3%	46.9%	1,668	38.9%	51.8%	5	38.5%	43.4%	819	65.5%	49.7%	1	7.1%	45.4%	75	5.5%	51.0%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	62	100%	6,915	100%	100.0%	35	100%	100%	4,291	100%	100%	13	100%	100%	1,250	100%	100%	14	100%	100%	1,374	100%	100%
MULTI FAMILY	Multi-Family Units																							
	Low	17	43.6%	12,734	21.4%	28.1%	9	39.1%	36.6%	4,656	32.8%	9.4%	7	70.0%	36.0%	7,682	19.7%	14.4%	1	16.7%	38.9%	396	6.2%	38.5%
	Moderate	9	23.1%	4,362	7.3%	26.7%	6	26.1%	24.7%	2,742	19.3%	14.6%	2	20.0%	24.0%	1,247	3.2%	21.5%	1	16.7%	13.0%	373	5.9%	12.7%
	Middle	11	28.2%	40,113	67.4%	22.9%	6	26.1%	22.6%	4,528	31.9%	40.0%	1	10.0%	20.0%	30,000	77.1%	12.4%	4	66.7%	31.5%	5,585	87.9%	9.4%
	Upper	2	5.1%	2,268	3.8%	18.7%	2	8.7%	14.0%	2,268	16.0%	27.2%	0	0.0%	20.0%	0	0.0%	51.7%	0	0.0%	14.8%	0	0.0%	23.9%
	Unknown	0	0.0%	0	0.0%	3.6%	0	0.0%	2.2%	0	0.0%	8.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.9%	0	0.0%	15.6%
Total	39	100%	59,477	100%	100.0%	23	100%	100%	14,194	100%	100%	10	100%	100%	38,929	100%	100%	6	100%	100%	6,354	100%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	6.1%	0	0.0%	2.5%	0	0.0%	1.5%	0	0.0%	2.0%	0	0.0%	1.3%	0	0.0%	2.6%	0	0.0%	2.0%
	Moderate	5	8.6%	425	4.4%	17.4%	1	4.3%	9.3%	30	0.9%	6.7%	3	16.7%	11.6%	325	10.0%	8.8%	1	5.9%	13.2%	70	2.4%	10.9%
	Middle	23	39.7%	3,179	33.3%	35.0%	9	39.1%	37.1%	1,229	36.4%	32.3%	6	33.3%	35.2%	1,110	34.2%	31.5%	8	47.1%	37.1%	840	28.8%	30.7%
	Upper	30	51.7%	5,948	62.3%	41.4%	13	56.5%	51.0%	2,122	62.8%	59.4%	9	50.0%	51.0%	1,815	55.8%	58.1%	8	47.1%	46.9%	2,011	68.8%	56.2%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0.2%	0	0.0%	0.1%
	Total	58	100%	9,552	100%	100.0%	23	100%	100%	3,381	100%	100%	18	100%	100%	3,250	100%	100%	17	100%	100%	2,921	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg		
		#	%	\$ (000s)	%	#	%	Agg	\$ (000s)	%	Agg	%	#	%	Agg	%	#	%	Agg	%	#	%	Agg	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	6.1%	0	0.0%	4.4%	0	0.0%	3.5%	0	0.0%	3.7%	0	0.0%	2.8%	0	0.0%	4.2%	0	0.0%	3.9%
	Moderate	1	10.0%	76	8.3%	17.4%	1	33.3%	16.3%	76	16.0%	11.3%	0	0.0%	15.1%	0	0.0%	11.1%	0	0.0%	15.2%	0	0.0%	13.4%
	Middle	5	50.0%	425	46.4%	35.0%	1	33.3%	33.9%	139	29.3%	27.1%	2	40.0%	37.9%	195	55.9%	35.9%	2	100.0%	38.3%	91	100.0%	33.4%
	Upper	4	40.0%	414	45.2%	41.4%	1	33.3%	45.4%	260	54.7%	58.1%	3	60.0%	42.6%	154	44.1%	49.3%	0	0.0%	42.3%	0	0.0%	49.3%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.7%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	10	100%	915	100%	100.0%	3	100%	100%	475	100%	100%	5	100%	100%	349	100%	100%	2	100%	100%	91	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	6.1%	0	0.0%	11.3%	0	0.0%	3.7%	0	0.0%	2.0%	0	0.0%	0.9%	0	0.0%	3.6%	0	0.0%	2.2%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	33.9%	0	0.0%	16.5%	0	0.0%	24.0%	0	0.0%	25.4%	0	0.0%	17.9%	0	0.0%	16.8%
	Middle	0	0.0%	0	0.0%	35.0%	0	0.0%	32.2%	0	0.0%	26.9%	0	0.0%	48.0%	0	0.0%	44.4%	0	0.0%	53.6%	0	0.0%	48.6%
	Upper	0	0.0%	0	0.0%	41.4%	0	0.0%	22.6%	0	0.0%	52.9%	0	0.0%	26.0%	0	0.0%	29.4%	0	0.0%	25.0%	0	0.0%	32.4%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	76	11.3%	21,391	10.9%	6.1%	32	11.0%	4.7%	8,032	10.5%	3.4%	24	12.2%	4.9%	10,273	13.1%	4.1%	20	10.7%	4.8%	3,086	7.3%	4.7%
	Moderate	155	23.0%	30,644	15.5%	17.4%	63	21.7%	15.3%	13,099	17.1%	12.8%	41	20.9%	16.0%	7,972	10.2%	14.1%	51	27.3%	15.6%	9,573	22.7%	12.9%
	Middle	252	37.4%	88,012	44.6%	35.0%	110	37.9%	38.7%	26,682	34.8%	38.4%	69	35.2%	38.0%	43,274	55.3%	34.5%	73	39.0%	39.4%	18,056	42.8%	36.9%
	Upper	190	28.2%	57,092	29.0%	41.4%	85	29.3%	41.2%	28,866	37.6%	44.4%	62	31.6%	41.0%	16,744	21.4%	47.2%	43	23.0%	40.1%	11,482	27.2%	44.7%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	1.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.8%
	Total	673	100%	197,139	100%	100.0%	290	100%	100%	76,679	100%	100%	196	100%	100%	78,263	100%	100%	187	100%	100%	42,197	100%	100%

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending															
		2022, 2023, 2024					2022					2023					2024					
		Bank				Total Businesses	Count		Dollar			Count		Dollar			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	39	9.5%	7,917	10.7%	15.0%	13	8.6%	12.8%	2,684	8.5%	19.0%	15	11.6%	12.3%	2,899	12.7%	17.4%	11	8.5%	2,334	12.1%
	Moderate	111	27.1%	18,190	24.7%	18.0%	42	27.6%	15.8%	6,602	20.8%	14.9%	38	29.5%	15.1%	7,235	31.7%	15.5%	31	24.0%	4,353	22.5%
	Middle	141	34.4%	26,100	35.4%	27.0%	53	34.9%	27.2%	11,691	36.9%	21.1%	39	30.2%	26.9%	6,470	28.4%	20.4%	49	38.0%	7,939	41.1%
	Upper	114	27.8%	19,695	26.7%	37.3%	43	28.3%	41.8%	10,691	33.8%	42.0%	34	26.4%	43.7%	4,522	19.8%	42.8%	37	28.7%	4,482	23.2%
	Unknown	5	1.2%	1,886	2.6%	2.7%	1	0.7%	2.0%	5	0.0%	2.9%	3	2.3%	1.7%	1,681	7.4%	3.9%	1	0.8%	200	1.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.4%	0	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	410	100%	73,788	100%	100.0%	152	100%	100%	31,673	100%	100%	129	100%	100%	22,807	100%	100%	129	100%	19,308	100%
SMALL FARM					Total Farms																	
	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	2.0%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Moderate	4	10.8%	316	6.7%	20.6%	2	12.5%	20.8%	137	7.4%	22.0%	1	8.3%	24.5%	99	6.8%	14.2%	1	11.1%	80	5.6%
	Middle	33	89.2%	4,399	93.3%	47.2%	14	87.5%	60.4%	1,716	92.6%	58.2%	11	91.7%	60.3%	1,347	93.2%	74.7%	8	88.9%	1,336	94.4%
	Upper	0	0.0%	0	0.0%	28.8%	0	0.0%	18.8%	0	0.0%	19.8%	0	0.0%	13.2%	0	0.0%	10.9%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	1.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	37	100%	4,715	100%	100.0%	16	100%	100%	1,853	100%	100%	12	100%	100%	1,446	100%	100%	9	100%	1,416	100%	

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Huntsville

Product Type	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Families by Family Income %	Count		Dollar			Count			Dollar			Count			Dollar			
		Count	%	\$ (000s)	\$ %		Bank	%	Agg	Bank	\$ %	Agg	Bank	%	Agg	Bank	\$ %	Agg	Bank	%	Agg	Bank	\$ %	Agg
HOME PURCHASE	Low	12	4.5%	2,263	2.9%	23.1%	5	4.3%	5.7%	1,190	3.4%	2.9%	2	2.5%	7.4%	252	1.1%	3.9%	5	7.0%	8.2%	821	4.1%	4.5%
	Moderate	33	12.3%	6,367	8.2%	16.3%	9	7.7%	16.4%	1,647	4.7%	12.3%	14	17.5%	19.6%	2,701	11.9%	15.2%	10	14.1%	21.2%	2,019	10.0%	16.4%
	Middle	37	13.8%	10,028	12.9%	19.5%	15	12.8%	23.1%	4,296	12.4%	21.9%	9	11.3%	21.7%	2,815	12.4%	21.2%	13	18.3%	19.4%	2,917	14.5%	18.9%
	Upper	111	41.4%	45,189	58.2%	41.1%	54	46.2%	35.5%	20,916	60.3%	43.2%	29	36.3%	27.0%	11,820	51.9%	35.8%	28	39.4%	23.5%	12,453	61.7%	31.7%
	Unknown	75	28.0%	13,773	17.7%	0.0%	34	29.1%	19.3%	6,636	19.1%	19.8%	26	32.5%	24.2%	5,177	22.7%	23.9%	15	21.1%	27.7%	1,960	9.7%	28.5%
	Total	268	100%	77,620	100%	100.0%	117	100%	100%	34,685	100%	100%	80	100%	100%	22,765	100%	100%	71	100%	100%	20,170	100%	100%
REFINANCE	Low	19	8.1%	2,080	4.9%	23.1%	4	4.5%	11.3%	495	2.5%	6.3%	7	10.0%	15.2%	758	6.5%	8.9%	8	10.4%	12.2%	827	7.3%	5.9%
	Moderate	17	7.2%	1,835	4.3%	16.3%	5	5.6%	19.6%	744	3.8%	14.9%	2	2.9%	18.8%	140	1.2%	15.1%	10	13.0%	17.0%	951	8.4%	11.7%
	Middle	29	12.3%	4,301	10.1%	19.5%	13	14.6%	20.4%	2,184	11.1%	19.0%	8	11.4%	20.3%	1,209	10.3%	18.7%	8	10.4%	16.5%	908	8.0%	13.9%
	Upper	100	42.4%	24,574	57.6%	41.1%	42	47.2%	33.7%	12,983	66.1%	43.2%	35	50.0%	30.6%	7,309	62.4%	39.6%	23	29.9%	23.3%	4,282	37.9%	28.0%
	Unknown	71	30.1%	9,870	23.1%	0.0%	25	28.1%	15.0%	3,247	16.5%	16.6%	18	25.7%	15.1%	2,304	19.7%	17.7%	28	36.4%	30.9%	4,319	38.3%	40.5%
	Total	236	100%	42,660	100%	100.0%	89	100%	100%	19,653	100%	100%	70	100%	100%	11,720	100%	100%	77	100%	100%	11,287	100%	100%
HOME IMPROVEMENT	Low	5	8.1%	214	3.1%	23.1%	2	5.7%	7.2%	112	2.6%	5.6%	0	0.0%	10.9%	0	0.0%	6.3%	3	21.4%	11.3%	102	7.4%	6.2%
	Moderate	5	8.1%	132	1.9%	16.3%	3	8.6%	17.2%	60	1.4%	12.4%	1	7.7%	18.4%	30	2.4%	12.9%	1	7.1%	18.4%	42	3.1%	13.6%
	Middle	11	17.7%	798	11.5%	19.5%	5	14.3%	22.0%	410	9.6%	18.7%	3	23.1%	24.3%	155	12.4%	20.6%	3	21.4%	24.3%	233	17.0%	22.9%
	Upper	30	48.4%	4,076	58.9%	41.1%	20	57.1%	49.3%	2,705	63.0%	57.5%	7	53.8%	42.0%	1,035	82.8%	55.1%	3	21.4%	41.1%	336	24.5%	50.4%
	Unknown	11	17.7%	1,695	24.5%	0.0%	5	14.3%	4.3%	1,004	23.4%	5.9%	2	15.4%	4.4%	30	2.4%	5.0%	4	28.6%	4.9%	661	48.1%	6.9%
	Total	62	100%	6,915	100%	100.0%	35	100%	100%	4,291	100%	100%	13	100%	100%	1,250	100%	100%	14	100%	100%	1,374	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	23.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	1	2.6%	250	0.4%	19.5%	1	4.3%	1.1%	250	1.8%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	41.1%	0	0.0%	2.2%	0	0.0%	0.1%	0	0.0%	4.0%	0	0.0%	0.4%	0	0.0%	3.7%	0	0.0%	1.2%
	Unknown	38	97.4%	59,227	99.6%	0.0%	22	95.7%	96.8%	13,944	98.2%	99.9%	10	100.0%	96.0%	38,929	100.0%	99.6%	6	100.0%	96.3%	6,354	100.0%	98.8%
	Total	39	100%	59,477	100%	100.0%	23	100%	100%	14,194	100%	100%	10	100%	100%	38,929	100%	100%	6	100%	100%	6,354	100%	100%
OTHER PURPOSE LOC	Low	2	3.4%	100	1.0%	23.1%	1	4.3%	6.1%	30	0.9%	3.0%	0	0.0%	9.1%	0	0.0%	5.1%	1	5.9%	10.6%	70	2.4%	6.1%
	Moderate	5	8.6%	380	4.0%	16.3%	2	8.7%	15.3%	125	3.7%	9.6%	1	5.6%	18.6%	80	2.5%	10.6%	2	11.8%	19.6%	175	6.0%	13.1%
	Middle	12	20.7%	1,588	16.6%	19.5%	3	13.0%	19.8%	233	6.9%	14.4%	6	33.3%	25.9%	1,030	31.7%	22.8%	3	17.6%	24.6%	325	11.1%	20.0%
	Upper	38	65.5%	7,401	77.5%	41.1%	16	69.6%	55.0%	2,910	86.1%	69.0%	11	61.1%	43.0%	2,140	65.8%	57.8%	11	64.7%	40.6%	2,351	80.5%	56.8%
	Unknown	1	1.7%	83	0.9%	0.0%	1	4.3%	3.8%	83	2.5%	4.0%	0	0.0%	3.4%	0	0.0%	3.7%	0	0.0%	4.7%	0	0.0%	4.0%
	Total	58	100%	9,552	100%	100.0%	23	100%	100%	3,381	100%	100%	18	100%	100%	3,250	100%	100%	17	100%	100%	2,921	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Huntsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank			Families by Family Income %	Count		Dollar			Count		Dollar			Count		Dollar						
		Count	Dollar	%		Bank	Agg	\$ (000s)	\$ %	Agg	Bank	Agg	\$ (000s)	\$ %	Agg	Bank	Agg	\$ (000s)	\$ %	Agg				
OTHER PURPOSE CLOSED/EXEMPT	Low	1	10.0%	155	16.9%	23.1%	0	0.0%	8.8%	0	0.0%	4.9%	1	20.0%	14.4%	155	44.4%	11.5%	0	0.0%	15.5%	0	0.0%	12.9%
	Moderate	2	20.0%	91	9.9%	16.3%	0	0.0%	13.2%	0	0.0%	8.7%	0	0.0%	23.5%	0	0.0%	18.1%	2	100.0%	16.3%	91	100.0%	13.7%
	Middle	0	0.0%	0	0.0%	19.5%	0	0.0%	21.1%	0	0.0%	18.6%	0	0.0%	20.1%	0	0.0%	19.5%	0	0.0%	27.0%	0	0.0%	21.9%
	Upper	5	50.0%	597	65.2%	41.1%	3	100.0%	44.1%	475	100.0%	49.0%	2	40.0%	35.2%	122	35.0%	44.8%	0	0.0%	31.5%	0	0.0%	38.8%
	Unknown	2	20.0%	72	7.9%	0.0%	0	0.0%	12.8%	0	0.0%	18.8%	2	40.0%	6.7%	72	20.6%	6.1%	0	0.0%	9.7%	0	0.0%	12.8%
	Total	10	100%	915	100%	100.0%	3	100%	100%	475	100%	100%	5	100%	100%	349	100%	100%	2	100%	100%	91	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	23.1%	0	0.0%	0.9%	0	0.0%	0.3%	0	0.0%	6.0%	0	0.0%	3.5%	0	0.0%	3.6%	0	0.0%	4.4%
	Moderate	0	0.0%	0	0.0%	16.3%	0	0.0%	0.9%	0	0.0%	0.4%	0	0.0%	4.0%	0	0.0%	7.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	41.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.0%	0	0.0%	7.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	98.3%	0	0.0%	99.3%	0	0.0%	86.0%	0	0.0%	81.2%	0	0.0%	96.4%	0	0.0%	95.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	39	5.8%	4,812	2.4%	23.1%	12	4.1%	7.4%	1,827	2.4%	3.4%	10	5.1%	9.3%	1,165	1.5%	4.3%	17	9.1%	9.5%	1,820	4.3%	4.7%
	Moderate	62	9.2%	8,805	4.5%	16.3%	19	6.6%	17.1%	2,576	3.4%	11.3%	18	9.2%	19.3%	2,951	3.8%	13.7%	25	13.4%	19.9%	3,278	7.8%	14.7%
	Middle	90	13.4%	16,965	8.6%	19.5%	37	12.8%	21.9%	7,373	9.6%	18.5%	26	13.3%	21.8%	5,209	6.7%	18.9%	27	14.4%	19.4%	4,383	10.4%	17.2%
	Upper	284	42.2%	81,837	41.5%	41.1%	135	46.6%	36.7%	39,989	52.2%	38.8%	84	42.9%	29.8%	22,426	28.7%	33.9%	65	34.8%	25.5%	19,422	46.0%	30.4%
	Unknown	198	29.4%	84,720	43.0%	0.0%	87	30.0%	16.9%	24,914	32.5%	28.0%	58	29.6%	19.9%	46,512	59.4%	29.2%	53	28.3%	25.7%	13,294	31.5%	33.1%
	Total	673	100%	197,139	100%	100.0%	290	100%	100%	76,679	100%	100%	196	100%	100%	78,263	100%	100%	187	100%	100%	42,197	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: AL Huntsville

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending																
			2022, 2023, 2024					2022					2023					2024						
			Bank				Total Businesses	Count			Dollar		Agg \$ %	Count			Dollar		Agg \$ %	Count			Dollar	
			Count	%	Dollar \$ (000s)	\$ %		Bank	%	Agg %	Bank	\$ %		Bank	%	Agg %	Bank	\$ %		Agg \$ %	Bank	%	Dollar \$ 000s	\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	198	48.3%	22,043	29.9%	93.2%	69	45.4%	46.9%	10,148	32.0%	35.0%	67	51.9%	49.9%	6,088	26.7%	31.9%	62	48.1%	5,807	30.1%	
		Over \$1 Million	202	49.3%	50,791	68.8%	6.0%	82	53.9%		21,253	67.1%		62	48.1%		16,719	73.3%		58	45.0%	12,819	66.4%	
		Total Rev. available	400	97.6%	72,834	98.7%	99.2%	151	99.3%		31,401	99.1%		129	100.0%		22,807	100.0%		120	93.0%	18,626	96.5%	
		Rev. Not Known	10	2.4%	954	1.3%	0.8%	1	0.7%		272	0.9%		0	0.0%		0	0.0%		9	7.0%	682	3.5%	
		Total	410	100%	73,788	100%	100%	152	100%		31,673	100%		129	100%		22,807	100%		129	100%	19,308	100%	
	Loan Size	\$100,000 or Less	225	54.9%	11,473	15.5%		72	47.4%	89.3%	3,272	10.3%	26.0%	75	58.1%	91.1%	4,302	18.9%	29.9%	78	60.5%	3,899	20.2%	
		\$100,001 - \$250,000	89	21.7%	15,422	20.9%		34	22.4%	5.1%	5,490	17.3%	16.8%	27	20.9%	4.2%	4,719	20.7%	15.4%	28	21.7%	5,213	27.0%	
		\$250,001 - \$1 Million	96	23.4%	46,893	63.6%		46	30.3%	5.6%	22,911	72.3%	57.2%	27	20.9%	4.7%	13,786	60.4%	54.7%	23	17.8%	10,196	52.8%	
		Total	410	100%	73,788	100%		152	100%	100%	31,673	100%	100%	129	100%	100%	22,807	100%	100%	129	100%	19,308	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	141	71.2%	6,337	28.7%		46	66.7%		1,925	19.0%		48	71.6%		2,344	38.5%		47	75.8%	2,068	35.6%	
		\$100,001 - \$250,000	31	15.7%	4,869	22.1%		9	13.0%		1,403	13.8%		13	19.4%		1,876	30.8%		9	14.5%	1,590	27.4%	
		\$250,001 - \$1 Million	26	13.1%	10,837	49.2%		14	20.3%		6,820	67.2%		6	9.0%		1,868	30.7%		6	9.7%	2,149	37.0%	
		Total	198	100%	22,043	100%		69	100%		10,148	100%		67	100%		6,088	100%		62	100%	5,807	100%	
SMALL FARM	Revenue	\$1 Million or Less	31	83.8%	3,717	78.8%	96.8%	13	81.3%	38.3%	1,186	64.0%	46.8%	10	83.3%	39.7%	1,288	89.1%	53.5%	8	88.9%	1,243	87.8%	
		Over \$1 Million	6	16.2%	998	21.2%	3.2%	3	18.8%		667	36.0%		2	16.7%		158	10.9%		1	11.1%	173	12.2%	
		Total Rev. available	37	100.0%	4,715	100.0%	100.0%	16	100.0%		1,853	100.0%		12	100.0%		1,446	100.0%		9	100.0%	1,416	100.0%	
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	
		Total	37	100%	4,715	100%	100%	16	100%		1,853	100%		12	100%		1,446	100%		9	100%	1,416	100%	
	Loan Size	\$100,000 or Less	22	59.5%	985	20.9%		10	62.5%	79.2%	336	18.1%	22.2%	8	66.7%	84.8%	426	29.5%	27.4%	4	44.4%	223	15.7%	
		\$100,001 - \$250,000	8	21.6%	1,180	25.0%		3	18.8%	12.1%	367	19.8%	29.9%	2	16.7%	8.6%	320	22.1%	29.3%	3	33.3%	493	34.8%	
		\$250,001 - \$500,000	7	18.9%	2,550	54.1%		3	18.8%	8.7%	1,150	62.1%	47.8%	2	16.7%	6.6%	700	48.4%	43.3%	2	22.2%	700	49.4%	
		Total	37	100%	4,715	100%		16	100%	100%	1,853	100%	100%	12	100%	100%	1,446	100%	100%	9	100%	1,416	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	19	61.3%	727	19.6%		9	69.2%		236	19.9%		6	60.0%		268	20.8%		4	50.0%	223	17.9%	
		\$100,001 - \$250,000	6	19.4%	890	23.9%		2	15.4%		250	21.1%		2	20.0%		320	24.8%		2	25.0%	320	25.7%	
		\$250,001 - \$500,000	6	19.4%	2,100	56.5%		2	15.4%		700	59.0%		2	20.0%		700	54.3%		2	25.0%	700	56.3%	
		Total	31	100%	3,717	100%		13	100%		1,186	100%		10	100%		1,288	100%		8	100%	1,243	100%	

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX F – LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: AL Decatur

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.4%	322	0.8%	110	34.2%	8,732	22.0%
Moderate-income	7	16.7%	5,647	14.3%	1,410	25.0%	6,583	16.6%
Middle-income	25	59.5%	25,160	63.5%	2,871	11.4%	8,402	21.2%
Upper-income	9	21.4%	8,477	21.4%	519	6.1%	15,889	40.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	42	100.0%	39,606	100.0%	4,910	12.4%	39,606	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,077	316	0.7%	29.3%	470	43.6%	291	27.0%
Moderate-income	10,700	4,516	10.4%	42.2%	4,374	40.9%	1,810	16.9%
Middle-income	42,185	27,964	64.5%	66.3%	8,914	21.1%	5,307	12.6%
Upper-income	13,619	10,542	24.3%	77.4%	1,843	13.5%	1,234	9.1%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	67,581	43,338	100.0%	64.1%	15,601	23.1%	8,642	12.8%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	58	1.1%	52	1.1%	6	1.5%	0	0.0%
Moderate-income	886	17.3%	785	16.8%	91	23.2%	10	14.1%
Middle-income	3,354	65.3%	3,046	65.2%	264	67.3%	44	62.0%
Upper-income	838	16.3%	790	16.9%	31	7.9%	17	23.9%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	5,136	100.0%	4,673	100.0%	392	100.0%	71	100.0%
	Percentage of Total Businesses:			91.0%		7.6%		1.4%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5%	1	0.5%	0	0.0%	0	0.0%
Moderate-income	11	5.6%	9	4.8%	2	40.0%	0	0.0%
Middle-income	141	72.3%	139	73.5%	2	40.0%	0	0.0%
Upper-income	42	21.5%	40	21.2%	1	20.0%	1	100.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	195	100.0%	189	100.0%	5	100.0%	1	100.0%
	Percentage of Total Farms:			96.9%		2.6%		0.5%

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

## Combined Demographics Report

### Assessment Area: AL Franklin

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	9.1%	484	6.4%	109	22.5%	2,056	27.2%
Moderate-income	1	9.1%	811	10.7%	172	21.2%	1,304	17.2%
Middle-income	8	72.7%	5,369	70.9%	871	16.2%	1,350	17.8%
Upper-income	1	9.1%	906	12.0%	74	8.2%	2,860	37.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>11</b>	<b>100.0%</b>	<b>7,570</b>	<b>100.0%</b>	<b>1,226</b>	<b>16.2%</b>	<b>7,570</b>	<b>100.0%</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	737	416	5.3%	56.4%	163	22.1%	158	21.4%
Moderate-income	1,582	784	10.0%	49.6%	442	27.9%	356	22.5%
Middle-income	10,357	5,668	72.4%	54.7%	2,433	23.5%	2,256	21.8%
Upper-income	1,406	960	12.3%	68.3%	151	10.7%	295	21.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>14,082</b>	<b>7,828</b>	<b>100.0%</b>	<b>55.6%</b>	<b>3,189</b>	<b>22.6%</b>	<b>3,065</b>	<b>21.8%</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	%	#	%	#	%
Low-income	25	3.5%	24	3.8%	1	1.5%	0	0.0%
Moderate-income	61	8.5%	47	7.4%	12	18.2%	2	12.5%
Middle-income	583	81.2%	518	81.4%	52	78.8%	13	81.3%
Upper-income	49	6.8%	47	7.4%	1	1.5%	1	6.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>718</b>	<b>100.0%</b>	<b>636</b>	<b>100.0%</b>	<b>66</b>	<b>100.0%</b>	<b>16</b>	<b>100.0%</b>
	<b>Percentage of Total Businesses:</b>			<b>88.6%</b>		<b>9.2%</b>		<b>2.2%</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1	4.5%	1	4.5%	0	0.0%	0	0.0%
Middle-income	19	86.4%	19	86.4%	0	0.0%	0	0.0%
Upper-income	2	9.1%	2	9.1%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total Assessment Area</b>	<b>22</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
	<b>Percentage of Total Farms:</b>			<b>100.0%</b>		<b>0.0%</b>		<b>0.0%</b>

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



## APPENDIX G – LIMITED SCOPE LENDING TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Decatur

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																					
		2022, 2023, 2024					2022					2023					2024											
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar			Count			Dollar						
		Count	%	Dollar	\$ (000s)		\$ %	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	0.8%	128	0.5%	0.7%	1	1.9%	0.5%	128	1.3%	0.2%	0	0.0%	1.0%	0	0.0%	0.4%	0	0.0%	1.1%	0	0.0%	0.5%				
	Moderate	29	22.1%	4,737	17.2%	10.4%	13	24.5%	11.5%	2,039	20.3%	8.0%	11	26.8%	10.8%	1,616	19.6%	7.9%	5	13.5%	10.6%	1,082	11.8%	7.5%				
	Middle	82	62.6%	17,174	62.5%	64.5%	33	62.3%	64.4%	6,217	62.0%	64.6%	22	53.7%	66.7%	4,226	51.2%	67.5%	27	73.0%	60.1%	6,731	73.1%	59.6%				
	Upper	19	14.5%	5,454	19.8%	24.3%	6	11.3%	23.6%	1,645	16.4%	27.2%	8	19.5%	21.5%	2,414	29.2%	24.1%	5	13.5%	28.1%	1,395	15.1%	32.4%				
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Total	131	100%	27,493	100%	100.0%	53	100%	100%	10,029	100%	100%	41	100%	100%	8,256	100%	100%	37	100%	100%	9,208	100%	100%				
REFINANCE	Low	1	0.7%	83	0.6%	0.7%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.6%	0	0.0%	0.3%	1	2.2%	0.8%	83	1.9%	0.4%				
	Moderate	12	8.5%	1,012	6.9%	10.4%	4	7.4%	9.9%	336	4.6%	6.8%	2	4.8%	9.2%	62	2.1%	6.2%	6	13.3%	10.3%	614	13.9%	6.6%				
	Middle	106	75.2%	10,930	74.8%	64.5%	42	77.8%	65.2%	5,779	79.9%	66.7%	31	73.8%	68.1%	2,351	79.3%	68.7%	33	73.3%	65.3%	2,800	63.4%	67.1%				
	Upper	22	15.6%	2,588	17.7%	24.3%	8	14.8%	24.7%	1,116	15.4%	26.5%	9	21.4%	22.1%	550	18.6%	24.8%	5	11.1%	23.6%	922	20.9%	25.9%				
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Total	141	100%	14,613	100%	100.0%	54	100%	100%	7,231	100%	100%	42	100%	100%	2,963	100%	100%	45	100%	100%	4,419	100%	100%				
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.7%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0.4%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%				
	Moderate	6	15.0%	463	16.9%	10.4%	3	20.0%	7.4%	246	26.9%	6.5%	2	15.4%	8.1%	187	18.5%	5.2%	1	8.3%	10.8%	30	3.7%	10.5%				
	Middle	30	75.0%	2,093	76.3%	64.5%	11	73.3%	66.3%	608	66.4%	67.7%	11	84.6%	64.6%	823	81.5%	64.9%	8	66.7%	62.7%	662	81.0%	62.8%				
	Upper	4	10.0%	187	6.8%	24.3%	1	6.7%	26.0%	62	6.8%	25.7%	0	0.0%	27.0%	0	0.0%	29.8%	3	25.0%	26.5%	125	15.3%	26.8%				
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Total	40	100%	2,743	100%	100.0%	15	100%	100%	916	100%	100%	13	100%	100%	1,010	100%	100%	12	100%	100%	817	100%	100%				
MULTI-FAMILY		Multi-Family Units																										
	Low	0	0.0%	0	0.0%	2.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	9.1%	0	0.0%	4.2%				
	Moderate	0	0.0%	0	0.0%	32.7%	0	0.0%	36.4%	0	0.0%	63.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	18.2%	0	0.0%	65.3%				
	Middle	4	100.0%	2,843	100.0%	56.3%	2	100.0%	50.0%	2,172	100.0%	34.4%	2	100.0%	75.0%	671	100.0%	59.8%	0	0.0%	54.5%	0	0.0%	7.4%				
	Upper	0	0.0%	0	0.0%	8.9%	0	0.0%	13.6%	0	0.0%	2.6%	0	0.0%	25.0%	0	0.0%	40.2%	0	0.0%	18.2%	0	0.0%	23.1%				
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Total	4	100%	2,843	100%	100.0%	2	100%	100%	2,172	100%	100%	2	100%	100%	671	100%	100%	0	0.0%	100%	0	0.0%	100%				
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.7%	0	0.0%	0.6%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Moderate	5	14.3%	350	7.3%	10.4%	3	20.0%	8.2%	160	13.6%	4.7%	1	16.7%	6.3%	150	19.1%	5.4%	1	7.1%	8.2%	40	1.4%	5.5%				
	Middle	21	60.0%	3,086	64.6%	64.5%	6	40.0%	58.5%	535	45.3%	65.6%	5	83.3%	59.7%	636	80.9%	55.9%	10	71.4%	65.8%	1,915	68.1%	65.5%				
	Upper	9	25.7%	1,340	28.1%	24.3%	6	40.0%	32.7%	485	41.1%	29.4%	0	0.0%	34.0%	0	0.0%	38.7%	3	21.4%	26.0%	855	30.4%	29.0%				
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%				
	Total	35	100%	4,776	100%	100.0%	15	100%	100%	1,180	100%	100%	6	100%	100%	786	100%	100%	14	100%	100%	2,810	100%	100%				

Originations &amp; Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: AL Decatur

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.0%	0	0.0%	0.9%
	Moderate	0	0.0%	0	0.0%	10.4%	0	0.0%	10.0%	0	0.0%	8.2%	0	0.0%	7.2%	0	0.0%	6.3%	0	0.0%	10.4%	0	0.0%	11.3%
	Middle	9	90.0%	698	95.2%	64.5%	4	100.0%	58.6%	294	100.0%	60.7%	3	75.0%	69.9%	224	86.5%	72.9%	2	100.0%	65.6%	180	100.0%	65.8%
	Upper	1	10.0%	35	4.8%	24.3%	0	0.0%	31.4%	0	0.0%	31.1%	1	25.0%	22.9%	35	13.5%	20.8%	0	0.0%	22.9%	0	0.0%	22.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	10	100%	733	100%	100.0%	4	100%	100%	294	100%	100%	4	100%	100%	259	100%	100%	2	100%	100%	180	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.7%	0	0.0%	2.7%	0	0.0%	2.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	10.4%	0	0.0%	18.9%	0	0.0%	13.9%	0	0.0%	15.4%	0	0.0%	18.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	64.5%	0	0.0%	62.2%	0	0.0%	64.4%	0	0.0%	76.9%	0	0.0%	63.2%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	24.3%	0	0.0%	16.2%	0	0.0%	19.4%	0	0.0%	7.7%	0	0.0%	18.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	2	0.6%	211	0.4%	0.7%	1	0.7%	0.4%	128	0.6%	0.2%	0	0.0%	0.8%	0	0.0%	0.4%	1	0.9%	0.9%	83	0.5%	0.6%
	Moderate	52	14.4%	6,562	12.3%	10.4%	23	16.1%	10.8%	2,781	12.7%	10.3%	16	14.8%	9.9%	2,015	14.4%	7.4%	13	11.8%	10.4%	1,766	10.1%	9.6%
	Middle	252	69.8%	36,824	69.2%	64.5%	98	68.5%	64.4%	15,605	71.5%	63.7%	74	68.5%	66.6%	8,931	64.0%	67.4%	80	72.7%	62.0%	12,288	70.5%	59.7%
	Upper	55	15.2%	9,604	18.1%	24.3%	21	14.7%	24.5%	3,308	15.2%	25.7%	18	16.7%	22.7%	2,999	21.5%	24.8%	16	14.5%	26.6%	3,297	18.9%	30.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	361	100%	53,201	100%	100.0%	143	100%	100%	21,822	100%	100%	108	100%	100%	13,945	100%	100%	110	100%	100%	17,434	100%	100%

Originations &amp; Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: AL Decatur

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending															
		2022, 2023, 2024					2022					2023					2024					
		Bank				Total Businesses	Count		Dollar			Count		Dollar			Agg	Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Bank \$ 000s	Agg \$ %		
SMALL BUSINESSES	Low	4	1.3%	49	0.1%	1.1%	2	1.6%	1.3%	33	0.2%	3.4%	1	1.1%	0.9%	8	0.0%	3.8%	1	1.1%	8	0.1%
	Moderate	43	14.0%	5,734	11.0%	17.3%	21	16.9%	14.1%	3,959	19.0%	14.5%	16	17.6%	14.4%	1,387	8.5%	12.9%	6	6.5%	388	2.6%
	Middle	230	74.9%	41,687	80.0%	65.3%	85	68.5%	66.4%	15,082	72.2%	70.8%	67	73.6%	66.9%	13,849	84.9%	70.8%	78	84.8%	12,756	85.6%
	Upper	30	9.8%	4,627	8.9%	16.3%	16	12.9%	16.6%	1,809	8.7%	10.8%	7	7.7%	17.2%	1,069	6.6%	12.3%	7	7.6%	1,749	11.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.6%	0	0.0%	0.5%	0	0.0%	0.7%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Total	307	100%	52,097	100%	100.0%	124	100%	100%	20,883	100%	100%	91	100%	100%	16,313	100%	100%	92	100%	14,901	100%
SMALL FARM		Total Farms																				
	Low	0	0.0%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.1%	0	0.0%	0.5%	0	0.0%	0	0.0%
	Moderate	6	20.7%	1,627	44.2%	5.6%	6	42.9%	12.8%	1,627	77.4%	38.9%	0	0.0%	6.6%	0	0.0%	10.4%	0	0.0%	0	0.0%
	Middle	23	79.3%	2,055	55.8%	72.3%	8	57.1%	73.4%	474	22.6%	54.6%	10	100.0%	83.5%	1,146	100.0%	85.0%	5	100.0%	435	100.0%
	Upper	0	0.0%	0	0.0%	21.5%	0	0.0%	13.8%	0	0.0%	6.5%	0	0.0%	7.7%	0	0.0%	3.9%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.1%	0	0.0%	0.2%	0	0.0%	0	0.0%
Total	29	100%	3,682	100%	100.0%	14	100%	100%	2,101	100%	100%	10	100%	100%	1,146	100%	100%	5	100%	435	100%	

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Decatur

Product Type	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Families by Family Income	Count		Dollar			Count			Dollar			Count			Dollar			
		Count	%	\$ (000s)	\$ %		Bank	%	Agg	Bank	\$ %	Agg	Bank	%	Agg	Bank	\$ %	Agg	Bank	%	Agg	Bank	\$ %	Agg
HOME PURCHASE	Low	8	6.1%	862	3.1%	22.0%	4	7.5%	5.5%	464	4.6%	2.9%	2	4.9%	8.3%	210	2.5%	4.2%	2	5.4%	5.3%	188	2.0%	2.5%
	Moderate	21	16.0%	3,301	12.0%	16.6%	8	15.1%	19.5%	1,144	11.4%	13.8%	6	14.6%	21.7%	873	10.6%	16.4%	7	18.9%	19.0%	1,284	13.9%	13.3%
	Middle	32	24.4%	6,531	23.8%	21.2%	13	24.5%	21.7%	2,616	26.1%	19.7%	10	24.4%	23.6%	1,840	22.3%	22.8%	9	24.3%	23.4%	2,075	22.5%	22.1%
	Upper	51	38.9%	13,132	47.8%	40.1%	19	35.8%	33.0%	4,148	41.4%	42.5%	16	39.0%	25.0%	3,824	46.3%	34.4%	16	43.2%	25.3%	5,160	56.0%	33.4%
	Unknown	19	14.5%	3,667	13.3%	0.0%	9	17.0%	20.3%	1,657	16.5%	21.1%	7	17.1%	21.4%	1,509	18.3%	22.2%	3	8.1%	27.0%	501	5.4%	28.7%
	Total	131	100%	27,493	100%	100.0%	53	100%	100%	10,029	100%	100%	41	100%	100%	8,256	100%	100%	37	100%	100%	9,208	100%	100%
REFINANCE	Low	21	14.9%	1,167	8.0%	22.0%	5	9.3%	9.9%	217	3.0%	4.8%	9	21.4%	12.9%	617	20.8%	7.3%	7	15.6%	9.2%	333	7.5%	4.1%
	Moderate	27	19.1%	1,731	11.8%	16.6%	9	16.7%	18.6%	576	8.0%	14.1%	10	23.8%	20.5%	564	19.0%	14.7%	8	17.8%	16.6%	591	13.4%	11.0%
	Middle	25	17.7%	2,983	20.4%	21.2%	14	25.9%	22.1%	1,756	24.3%	20.4%	2	4.8%	19.8%	222	7.5%	19.3%	9	20.0%	20.5%	1,005	22.7%	16.4%
	Upper	50	35.5%	6,687	45.8%	40.1%	17	31.5%	35.8%	3,186	44.1%	44.5%	17	40.5%	31.4%	1,293	43.6%	39.0%	16	35.6%	29.1%	2,208	50.0%	35.5%
	Unknown	18	12.8%	2,045	14.0%	0.0%	9	16.7%	13.6%	1,496	20.7%	16.3%	4	9.5%	15.4%	267	9.0%	19.6%	5	11.1%	24.6%	282	6.4%	33.0%
	Total	141	100%	14,613	100%	100.0%	54	100%	100%	7,231	100%	100%	42	100%	100%	2,963	100%	100%	45	100%	100%	4,419	100%	100%
HOME IMPROVEMENT	Low	3	7.5%	95	3.5%	22.0%	2	13.3%	7.1%	75	8.2%	3.8%	0	0.0%	8.4%	0	0.0%	3.9%	1	8.3%	5.6%	2.0%	2.4%	3.8%
	Moderate	12	30.0%	694	25.3%	16.6%	6	40.0%	12.4%	349	38.1%	11.1%	2	15.4%	16.1%	125	12.4%	12.1%	4	33.3%	15.3%	220	26.9%	11.0%
	Middle	5	12.5%	413	15.1%	21.2%	0	0.0%	24.1%	0	0.0%	21.5%	4	30.8%	25.6%	353	35.0%	20.4%	1	8.3%	28.7%	60	7.3%	24.7%
	Upper	14	35.0%	1,154	42.1%	40.1%	2	13.3%	52.9%	125	13.6%	60.8%	7	53.8%	47.4%	532	52.7%	60.2%	5	41.7%	42.9%	497	60.8%	52.0%
	Unknown	6	15.0%	387	14.1%	0.0%	5	33.3%	3.4%	367	40.1%	2.9%	0	0.0%	2.5%	0	0.0%	3.4%	1	8.3%	7.5%	2.0%	2.4%	8.5%
	Total	40	100%	2,743	100%	100.0%	15	100%	100%	916	100%	100%	13	100%	100%	1,010	100%	100%	12	100%	100%	817	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	22.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	9.1%	0	0.0%	0.4%
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	12.5%	0	0.0%	3.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.1%	0	0.0%	4.5%	0	0.0%	0.6%	0	0.0%	12.5%	0	0.0%	5.3%	0	0.0%	9.1%	0	0.0%	1.8%
	Unknown	4	100.0%	2,843	100.0%	0.0%	2	100.0%	95.5%	2,172	100.0%	99.4%	2	100.0%	75.0%	671	100.0%	90.9%	0	0.0%	81.8%	0	0.0%	97.8%
	Total	4	100%	2,843	100%	100.0%	2	100%	100%	2,172	100%	100%	2	100%	100%	671	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	1	2.9%	20	0.4%	22.0%	0	0.0%	1.2%	0	0.0%	1.2%	0	0.0%	7.9%	0	0.0%	3.3%	1	7.1%	8.7%	20	0.7%	4.6%
	Moderate	3	8.6%	80	1.7%	16.6%	3	20.0%	12.9%	80	6.8%	8.1%	0	0.0%	18.3%	0	0.0%	12.8%	0	0.0%	19.9%	0	0.0%	12.1%
	Middle	3	8.6%	170	3.6%	21.2%	2	13.3%	23.4%	70	5.9%	17.8%	1	16.7%	29.3%	100	12.7%	26.4%	0	0.0%	18.9%	0	0.0%	13.5%
	Upper	28	80.0%	4,506	94.3%	40.1%	10	66.7%	59.1%	1,030	87.3%	71.0%	5	83.3%	42.9%	686	87.3%	55.4%	13	92.9%	48.5%	2,790	99.3%	65.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.5%	0	0.0%	1.9%	0	0.0%	1.6%	0	0.0%	2.1%	0	0.0%	4.1%	0	0.0%	4.5%
	Total	35	100%	4,776	100%	100.0%	15	100%	100%	1,180	100%	100%	6	100%	100%	786	100%	100%	14	100%	100%	2,810	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Decatur

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022						2023						2024					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	3	30.0%	133	18.1%	22.0%	1	25.0%	5.7%	24	8.2%	2.7%	2	50.0%	14.5%	109	42.1%	14.4%	0	0.0%	10.4%	0	0.0%	6.8%
	Moderate	2	20.0%	203	27.7%	16.6%	0	0.0%	18.6%	0	0.0%	10.3%	1	25.0%	21.7%	115	44.4%	16.2%	1	50.0%	25.0%	88	48.9%	21.0%
	Middle	1	10.0%	100	13.6%	21.2%	1	25.0%	30.0%	100	34.0%	30.1%	0	0.0%	27.7%	0	0.0%	32.2%	0	0.0%	25.0%	0	0.0%	23.1%
	Upper	2	20.0%	247	33.7%	40.1%	1	25.0%	37.1%	155	52.7%	50.4%	0	0.0%	31.3%	0	0.0%	33.9%	1	50.0%	33.3%	92	51.1%	44.4%
	Unknown	2	20.0%	50	6.8%	0.0%	1	25.0%	8.6%	15	5.1%	6.5%	1	25.0%	4.8%	35	13.5%	3.3%	0	0.0%	6.3%	0	0.0%	4.7%
	Total	10	100%	733	100%	100.0%	4	100%	100%	294	100%	100%	4	100%	100%	259	100%	100%	2	100%	100%	180	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	22.0%	0	0.0%	5.4%	0	0.0%	2.4%	0	0.0%	7.7%	0	0.0%	1.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.2%	0	0.0%	5.4%	0	0.0%	6.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	89.2%	0	0.0%	91.1%	0	0.0%	92.3%	0	0.0%	99.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	36	10.0%	2,277	4.3%	22.0%	12	8.4%	6.8%	780	3.6%	3.3%	13	12.0%	9.5%	936	6.7%	4.9%	11	10.0%	6.6%	561	3.2%	2.9%
	Moderate	65	18.0%	6,009	11.3%	16.6%	26	18.2%	18.2%	2,149	9.8%	13.0%	19	17.6%	20.7%	1,677	12.0%	15.7%	20	18.2%	18.3%	2,183	12.5%	12.2%
	Middle	66	18.3%	10,197	19.2%	21.2%	30	21.0%	22.0%	4,542	20.8%	18.9%	17	15.7%	23.2%	2,515	18.0%	22.1%	19	17.3%	22.8%	3,140	18.0%	19.8%
	Upper	145	40.2%	25,726	48.4%	40.1%	49	34.3%	35.9%	8,644	39.6%	41.7%	45	41.7%	29.3%	6,335	45.4%	36.5%	51	46.4%	28.7%	10,747	61.6%	33.9%
	Unknown	49	13.6%	8,992	16.9%	0.0%	26	18.2%	17.2%	5,707	26.2%	23.1%	14	13.0%	17.4%	2,482	17.8%	20.7%	9	8.2%	23.6%	803	4.6%	31.2%
	Total	361	100%	53,201	100%	100.0%	143	100%	100%	21,822	100%	100%	108	100%	100%	13,945	100%	100%	110	100%	100%	17,434	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: AL Decatur

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending																			
		2022, 2023, 2024					2022						2023						2024							
		Bank				Total Businesses	Count			Dollar			Agg	Count			Dollar			Agg	Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg	Bank		Agg		Bank	Agg	Bank	Agg		Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
SMALL BUSINESS	Revenue	\$1 Million or Less	130	42.3%	11,893	22.8%	91.0%	58	46.8%	55.6%	5,747	27.5%	39.3%	40	44.0%	53.1%	3,990	24.5%	34.2%	32	34.8%	2,156	14.5%			
		Over \$1 Million	172	56.0%	39,789	76.4%	7.6%	65	52.4%		15,111	72.4%		51	56.0%		12,323	75.5%		56	60.9%	12,355	82.9%			
		Total Rev. available	302	98.4%	51,682	99.2%	98.6%	123	99.2%		20,858	99.9%		91	100.0%		16,313	100.0%		88	95.7%	14,511	97.4%			
		Rev. Not Known	5	1.6%	415	0.8%	1.4%	1	0.8%		25	0.1%		0	0.0%		0	0.0%		4	4.3%	390	2.6%			
		Total	307	100%	52,097	100%	100%	124	100%		20,883	100%		91	100%		16,313	100%		92	100%	14,901	100%			
	Loan Size	\$100,000 or Less	182	59.3%	8,894	17.1%		71	57.3%	89.1%	3,534	16.9%	28.3%	54	59.3%	90.9%	2,697	16.5%	31.4%	57	62.0%	2,663	17.9%			
		\$100,001 - \$250,000	61	19.9%	9,596	18.4%		26	21.0%	5.8%	4,109	19.7%	19.3%	17	18.7%	4.7%	2,845	17.4%	17.9%	18	19.6%	2,642	17.7%			
		\$250,001 - \$1 Million	64	20.8%	33,607	64.5%		27	21.8%	5.1%	13,240	63.4%	52.4%	20	22.0%	4.4%	10,771	66.0%	50.7%	17	18.5%	9,596	64.4%			
		Total	307	100%	52,097	100%		124	100%	100%	20,883	100%	100%	91	100%	100%	16,313	100%	100%	92	100%	14,901	100%			
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	100	76.9%	3,869	32.5%		41	70.7%		1,582	27.5%		33	82.5%		1,369	34.3%		26	81.3%	918	42.6%			
		\$100,001 - \$250,000	19	14.6%	2,737	23.0%		11	19.0%		1,609	28.0%		4	10.0%		635	15.9%		4	12.5%	493	22.9%			
		\$250,001 - \$1 Million	11	8.5%	5,287	44.5%		6	10.3%		2,556	44.5%		3	7.5%		1,986	49.8%		2	6.3%	745	34.6%			
		Total	130	100%	11,893	100%		58	100%		5,747	100%		40	100%		3,990	100%		32	100%	2,156	100%			
SMALL FARM	Revenue	\$1 Million or Less	17	58.6%	1,475	40.1%	96.9%	6	42.9%	33.0%	294	14.0%	29.7%	7	70.0%	47.3%	896	78.2%	71.1%	4	80.0%	285	65.5%			
		Over \$1 Million	10	34.5%	2,147	58.3%	2.6%	7	50.0%		1,777	84.6%		2	20.0%		220	19.2%		1	20.0%	150	34.5%			
		Total Rev. available	27	93.1%	3,622	98.4%	99.5%	13	92.9%		2,071	98.6%		9	90.0%		1,116	97.4%		5	100.0%	435	100.0%			
		Not Known	2	6.9%	60	1.6%	0.5%	1	7.1%		30	1.4%		1	10.0%		30	2.6%		0	0.0%	0	0.0%			
		Total	29	100%	3,682	100%	100%	14	100%		2,101	100%		10	100%		1,146	100%		5	100%	435	100%			
	Loan Size	\$100,000 or Less	16	55.2%	710	19.3%		7	50.0%	85.3%	278	13.2%	34.3%	6	60.0%	83.5%	282	24.6%	27.5%	3	60.0%	150	34.5%			
		\$100,001 - \$250,000	9	31.0%	1,385	37.6%		4	28.6%	9.2%	615	29.3%	27.7%	3	30.0%	13.2%	485	42.3%	45.9%	2	40.0%	285	65.5%			
		\$250,001 - \$500,000	4	13.8%	1,587	43.1%		3	21.4%	5.5%	1,208	57.5%	38.0%	1	10.0%	3.3%	379	33.1%	26.6%	0	0.0%	0	0.0%			
		Total	29	100%	3,682	100%		14	100%	100%	2,101	100%	100%	10	100%	100%	1,146	100%	100%	5	100%	435	100%			
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	70.6%	491	33.3%		5	83.3%		159	54.1%		4	57.1%		182	20.3%		3	75.0%	150	52.6%			
		\$100,001 - \$250,000	4	23.5%	605	41.0%		1	16.7%		135	45.9%		2	28.6%		335	37.4%		1	25.0%	135	47.4%			
		\$250,001 - \$500,000	1	5.9%	379	25.7%		0	0.0%		0	0.0%		1	14.3%		379	42.3%		0	0.0%	0	0.0%			
		Total	17	100%	1,475	100%		6	100%		294	100%		7	100%		896	100%		4	100%	285	100%			

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Geographic Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Franklin

Product Type	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar			Count		Dollar					
		Count #	%	Dollar \$ (000s)	%		Bank #	%	Agg %	Bank \$ (000s)	%	Agg %	Bank #	%	Agg %	Bank \$ (000s)	%	Agg %	Bank #	%	Agg %			
HOME PURCHASE	Low	1	6.3%	166	4.7%	5.3%	1	16.7%	7.0%	166	13.6%	7.5%	0	0.0%	5.9%	0	0.0%	4.4%	0	0.0%	5.1%	0	0.0%	4.3%
	Moderate	1	6.3%	400	11.3%	10.0%	0	0.0%	6.1%	0	0.0%	5.7%	1	14.3%	6.3%	400	25.4%	8.9%	0	0.0%	7.7%	0	0.0%	7.6%
	Middle	14	87.5%	2,974	84.0%	72.4%	5	83.3%	79.6%	1,056	86.4%	79.2%	6	85.7%	74.2%	1,177	74.6%	74.3%	3	100.0%	76.5%	741	100.0%	78.3%
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	7.4%	0	0.0%	7.6%	0	0.0%	13.7%	0	0.0%	12.3%	0	0.0%	10.7%	0	0.0%	9.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	16	100%	3,540	100%	100.0%	6	100%	100%	1,222	100%	100%	7	100%	100%	1,577	100%	100%	3	100%	100%	741	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	5.3%	0	0.0%	5.4%	0	0.0%	3.9%	0	0.0%	5.7%	0	0.0%	12.7%	0	0.0%	4.3%	0	0.0%	4.6%
	Moderate	2	10.0%	123	6.7%	10.0%	1	12.5%	9.3%	75	7.4%	7.0%	0	0.0%	8.9%	0	0.0%	7.9%	1	20.0%	3.4%	48	23.5%	1.5%
	Middle	18	90.0%	1,701	93.3%	72.4%	7	87.5%	73.2%	937	92.6%	76.7%	7	100.0%	76.4%	608	100.0%	71.9%	4	80.0%	79.3%	156	76.5%	76.5%
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	12.2%	0	0.0%	12.4%	0	0.0%	8.9%	0	0.0%	7.4%	0	0.0%	12.9%	0	0.0%	17.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	20	100%	1,824	100%	100.0%	8	100%	100%	1,012	100%	100%	7	100%	100%	608	100%	100%	5	100%	100%	204	100%	100%
HOME IMPROVEMENT	Low	1	25.0%	75	31.0%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	12.0%	0	0.0%	11.5%	1	50.0%	2.9%	75	75.0%	4.1%
	Moderate	0	0.0%	0	0.0%	10.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.0%	0	0.0%	6.6%	0	0.0%	11.4%	0	0.0%	12.9%
	Middle	3	75.0%	167	69.0%	72.4%	1	100.0%	96.3%	100	100.0%	93.6%	1	100.0%	76.0%	42	100.0%	76.6%	1	50.0%	80.0%	25	25.0%	80.6%
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	3.7%	0	0.0%	6.4%	0	0.0%	8.0%	0	0.0%	5.3%	0	0.0%	5.7%	0	0.0%	2.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	4	100%	242	100%	100.0%	1	100%	100%	100	100%	100%	1	100%	100%	42	100%	100%	2	100%	100%	100	100%	100%
MULTI FAMILY		Multi-Family Units																						
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	1	100.0%	166	100.0%	77.6%	1	100.0%	77.8%	166	100.0%	92.7%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	2.6%	0	0.0%	22.2%	0	0.0%	7.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	166	100%	100.0%	1	100%	100%	166	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	11.8%	0	0.0%	10.4%	0	0.0%	4.8%	0	0.0%	1.1%
	Moderate	0	0.0%	0	0.0%	10.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.8%	0	0.0%	2.6%
	Middle	0	0.0%	0	0.0%	72.4%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	82.4%	0	0.0%	83.5%	0	0.0%	81.0%	0	0.0%	90.0%
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	5.9%	0	0.0%	6.1%	0	0.0%	9.5%	0	0.0%	6.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Franklin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg	Bank	Agg	Dollar	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	22.7%	0	0.0%	19.9%			
	Moderate	1	100.0%	29	100.0%	10.0%	1	100.0%	16.7%	29	100.0%	25.8%	0	0.0%	4.8%	0	0.0%	4.5%	0	0.0%	2.8%			
	Middle	0	0.0%	0	0.0%	72.4%	0	0.0%	66.7%	0	0.0%	61.5%	0	0.0%	71.4%	0	0.0%	59.1%	0	0.0%	63.0%			
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	16.7%	0	0.0%	12.7%	0	0.0%	23.8%	0	0.0%	13.6%	0	0.0%	14.3%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	1	100%	29	100%	100.0%	1	100%	100%	29	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%			
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Moderate	0	0.0%	0	0.0%	10.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Middle	0	0.0%	0	0.0%	72.4%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%			
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%			
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	100%	0	0.0%	100%			
HMDA TOTALS	Low	2	4.8%	241	4.2%	5.3%	1	5.9%	5.5%	166	6.6%	5.4%	0	0.0%	6.1%	0	0.0%	6.2%	1	10.0%	5.5%	75	7.2%	4.7%
	Moderate	4	9.5%	552	9.5%	10.0%	2	11.8%	7.1%	104	4.1%	5.9%	1	6.7%	6.5%	400	18.0%	8.1%	1	10.0%	6.6%	48	4.6%	6.0%
	Middle	36	85.7%	5,008	86.3%	72.4%	14	82.4%	77.9%	2,259	89.3%	79.4%	14	93.3%	75.2%	1,827	82.0%	74.6%	8	80.0%	77.0%	922	88.2%	77.9%
	Upper	0	0.0%	0	0.0%	12.3%	0	0.0%	9.5%	0	0.0%	9.3%	0	0.0%	12.2%	0	0.0%	11.1%	0	0.0%	10.9%	0	0.0%	11.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	42	100%	5,801	100%	100.0%	17	100%	100%	2,529	100%	100%	15	100%	100%	2,227	100%	100%	10	100%	100%	1,045	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans  
Assessment Area: AL Franklin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending															
		2022, 2023, 2024					2022					2023					2024					
		Bank				Total Businesses	Count			Dollar		Count			Dollar		Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	2.2%	0	0.0%	0.8%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	3	10.7%	152	4.0%	8.5%	1	11.1%	9.4%	50	3.8%	6.7%	1	11.1%	10.4%	51	4.9%	3.5%	1	10.0%	51	3.6%
	Middle	24	85.7%	3,349	89.0%	81.2%	8	88.9%	81.8%	1,268	96.2%	83.9%	7	77.8%	80.8%	727	70.0%	84.6%	9	90.0%	1,354	96.4%
	Upper	1	3.6%	260	6.9%	6.8%	0	0.0%	4.4%	0	0.0%	8.1%	1	11.1%	8.2%	260	25.0%	11.8%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	0.6%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	28	100%	3,761	100%	100.0%	9	100%	100%	1,318	100%	100%	9	100%	100%	1,038	100%	100%	10	100%	1,405	100%
SMALL FARM					Total Farms																	
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	8.9%	0	0.0%	17.1%	0	0.0%	5.6%	0	0.0%	2.2%	0	0.0%	0	0.0%
	Moderate	1	50.0%	6	7.0%	4.5%	1	100.0%	22.2%	6	100.0%	19.4%	0	0.0%	2.8%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Middle	1	50.0%	80	93.0%	86.4%	0	0.0%	46.7%	0	0.0%	41.7%	1	100.0%	72.2%	80	100.0%	71.6%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	9.1%	0	0.0%	22.2%	0	0.0%	21.8%	0	0.0%	19.4%	0	0.0%	26.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	2	100%	86	100%	100.0%	1	100%	100%	6	100%	100%	1	100%	100%	80	100%	100%	0	0.0%	0	0.0%	

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2  
Assessment Area: AL Franklin

PRODUCT TYPE		Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																
			2022, 2023, 2024					2022					2023					2024						
			Bank				Families by Family Income	Count		Dollar			Count		Dollar			Count		Dollar				
			Count	%	Dollar \$(000s)	%		Bank	Agg	Bank	\$	%	Agg	\$	%	Bank	\$	%	Agg	Bank	\$	%	Agg	\$
HOME PURCHASE	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	4.3%	0	0.0%	2.1%	0	0.0%	3.0%	0	0.0%	1.4%	0	0.0%	3.7%	0	0.0%	1.6%
	Moderate	1	6.3%	126	3.6%	17.2%	0	0.0%	24.8%	0	0.0%	19.4%	1	14.3%	20.7%	126	8.0%	15.0%	0	0.0%	20.6%	0	0.0%	12.8%
	Middle	3	18.8%	544	15.4%	17.8%	2	33.3%	17.0%	333	27.3%	16.4%	0	0.0%	20.3%	0	0.0%	17.3%	1	33.3%	25.7%	211	28.5%	24.0%
	Upper	10	62.5%	2,189	61.8%	37.8%	3	50.0%	32.2%	696	57.0%	39.7%	5	71.4%	33.9%	963	61.1%	41.9%	2	66.7%	29.0%	530	71.5%	38.1%
	Unknown	2	12.5%	681	19.2%	0.0%	1	16.7%	21.7%	193	15.8%	22.4%	1	14.3%	22.1%	488	30.9%	24.4%	0	0.0%	21.0%	0	0.0%	23.5%
	Total	16	100%	3,540	100%	100.0%	6	100%	100%	1,222	100%	100%	7	100%	100%	1,577	100%	100%	3	100%	100%	741	100%	100%
REFINANCE	Low	1	5.0%	48	2.6%	27.2%	0	0.0%	9.8%	0	0.0%	5.0%	0	0.0%	12.2%	0	0.0%	4.7%	1	20.0%	10.3%	48	23.5%	5.0%
	Moderate	4	20.0%	290	15.9%	17.2%	1	12.5%	26.8%	95	9.4%	19.7%	2	28.6%	17.1%	166	27.3%	11.9%	1	20.0%	10.3%	29	14.2%	9.2%
	Middle	3	15.0%	183	10.0%	17.8%	2	25.0%	26.8%	130	12.8%	23.0%	1	14.3%	18.7%	53	8.7%	17.5%	0	0.0%	21.6%	0	0.0%	17.2%
	Upper	12	60.0%	1,303	71.4%	37.8%	5	62.5%	30.2%	787	77.8%	44.5%	4	57.1%	47.2%	389	64.0%	59.0%	3	60.0%	43.1%	127	62.3%	46.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.3%	0	0.0%	7.8%	0	0.0%	4.9%	0	0.0%	6.9%	0	0.0%	14.7%	0	0.0%	22.2%
	Total	20	100%	1,824	100%	100.0%	8	100%	100%	1,012	100%	100%	7	100%	100%	608	100%	100%	5	100%	100%	204	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	3.7%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	8.6%	0	0.0%	5.2%
	Moderate	1	25.0%	25	10.3%	17.2%	0	0.0%	25.9%	0	0.0%	23.4%	0	0.0%	8.0%	0	0.0%	7.9%	1	50.0%	22.9%	25	25.0%	12.6%
	Middle	0	0.0%	0	0.0%	17.8%	0	0.0%	18.5%	0	0.0%	9.4%	0	0.0%	20.0%	0	0.0%	16.3%	0	0.0%	25.7%	0	0.0%	18.5%
	Upper	2	50.0%	117	48.3%	37.8%	0	0.0%	40.7%	0	0.0%	47.8%	1	100.0%	72.0%	42	100.0%	75.7%	1	50.0%	40.0%	75	75.0%	62.7%
	Unknown	1	25.0%	100	41.3%	0.0%	1	100.0%	11.1%	100	100.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	2.9%	0	0.0%	1.1%
	Total	4	100%	242	100%	100.0%	1	100%	100%	100	100%	100%	1	100%	100%	42	100%	100%	2	100%	100%	100	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	17.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	37.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	33.3%	0	0.0%	19.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	1	100.0%	166	100.0%	0.0%	1	100.0%	100.0%	166	100.0%	100.0%	0	0.0%	66.7%	0	0.0%	80.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	166	100%	100.0%	1	100%	100%	166	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	0.0%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	5.9%	0	0.0%	2.4%	0	0.0%	14.3%	0	0.0%	5.9%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	17.6%	0	0.0%	9.5%	0	0.0%	9.5%	0	0.0%	3.7%
	Middle	0	0.0%	0	0.0%	17.8%	0	0.0%	12.5%	0	0.0%	8.0%	0	0.0%	5.9%	0	0.0%	3.0%	0	0.0%	28.6%	0	0.0%	28.5%
	Upper	0	0.0%	0	0.0%	37.8%	0	0.0%	75.0%	0	0.0%	81.4%	0	0.0%	64.7%	0	0.0%	80.0%	0	0.0%	42.9%	0	0.0%	59.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.5%	0	0.0%	10.6%	0	0.0%	5.9%	0	0.0%	2.7%	0	0.0%	4.8%	0	0.0%	2.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2  
Assessment Area: AL Franklin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending																	
		2022, 2023, 2024					2022					2023					2024							
		Bank			Families by Family Income %	Count		Dollar			Count		Dollar			Count		Dollar						
		Count	Dollar			Bank	Agg	Bank	S %	Agg	Bank	Agg	Bank	S %	Agg	Bank	Agg	Bank	S %	Agg				
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	16.7%	0	0.0%	7.1%	0	0.0%	23.8%	0	0.0%	18.5%	0	0.0%	13.6%	0	0.0%	9.7%
	Moderate	1	100.0%	29	100.0%	17.2%	1	100.0%	25.0%	29	100.0%	14.3%	0	0.0%	23.8%	0	0.0%	11.7%	0	0.0%	27.3%	0	0.0%	9.7%
	Middle	0	0.0%	0	0.0%	17.8%	0	0.0%	8.3%	0	0.0%	21.9%	0	0.0%	4.8%	0	0.0%	4.6%	0	0.0%	22.7%	0	0.0%	27.4%
	Upper	0	0.0%	0	0.0%	37.8%	0	0.0%	41.7%	0	0.0%	42.9%	0	0.0%	42.9%	0	0.0%	59.8%	0	0.0%	31.8%	0	0.0%	42.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	8.3%	0	0.0%	13.9%	0	0.0%	4.8%	0	0.0%	5.5%	0	0.0%	4.5%	0	0.0%	10.9%
	Total	1	100%	29	100%	100.0%	1	100%	100%	29	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	27.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	17.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	37.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	1	2.4%	48	0.8%	27.2%	0	0.0%	6.7%	0	0.0%	3.0%	0	0.0%	6.3%	0	0.0%	2.5%	1	10.0%	6.6%	48	4.6%	2.8%
	Moderate	7	16.7%	470	8.1%	17.2%	2	11.8%	24.7%	124	4.9%	18.1%	3	20.0%	18.9%	292	13.1%	13.7%	2	20.0%	17.9%	54	5.2%	11.6%
	Middle	6	14.3%	727	12.5%	17.8%	4	23.5%	20.4%	463	18.3%	17.6%	1	6.7%	18.5%	53	2.4%	16.4%	1	10.0%	24.5%	211	20.2%	22.3%
	Upper	24	57.1%	3,609	62.2%	37.8%	8	47.1%	32.0%	1,483	58.6%	39.5%	10	66.7%	41.1%	1,394	62.6%	46.6%	6	60.0%	33.9%	732	70.0%	41.1%
	Unknown	4	9.5%	947	16.3%	0.0%	3	17.6%	16.2%	459	18.1%	21.7%	1	6.7%	15.2%	488	21.9%	20.8%	0	0.0%	17.1%	0	0.0%	22.1%
	Total	42	100%	5,801	100%	100.0%	17	100%	100%	2,529	100%	100%	15	100%	100%	2,227	100%	100%	10	100%	100%	1,045	100%	100%

Originations & Purchases  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Small Business & Small Farm Lending By Revenue & Loan Size  
Assessment Area: AL Franklin

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending																			
		2022, 2023, 2024					2022						2023						2024							
		Bank				Total Businesses	Count			Dollar			Agg	Count			Dollar			Agg	Count			Dollar		
		Count	%	Dollar	%		Bank	%	Agg	%	Bank	%		Agg	%	Bank	%	Agg	%		Bank	%	Agg	%		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
SMALL BUSINESS	Revenue	\$1 Million or Less	12	42.9%	946	25.2%	88.6%	3	33.3%	56.7%	75	5.7%	45.9%	4	44.4%	60.7%	495	47.7%	35.1%	5	50.0%	376	26.8%			
		Over \$1 Million	14	50.0%	2,615	69.5%	9.2%	5	55.6%		1,143	86.7%		4	44.4%		443	42.7%		5	50.0%	1,029	73.2%			
		Total Rev. available	26	92.9%	3,561	94.7%	97.8%	8	88.9%		1,218	92.4%		8	88.9%		938	90.4%		10	100.0%	1,405	100.0%			
		Rev. Not Known	2	7.1%	200	5.3%	2.2%	1	11.1%		100	7.6%		1	11.1%		100	9.6%		0	0.0%	0	0.0%			
		Total	28	100%	3,761	100%	100%	9	100%		1,318	100%		9	100%		1,038	100%		10	100%	1,405	100%			
	Loan Size	\$100,000 or Less	17	60.7%	940	25.0%		6	66.7%	92.2%	306	23.2%	41.4%	5	55.6%	88.4%	288	27.7%	30.2%	6	60.0%	346	24.6%			
		\$100,001 - \$250,000	7	25.0%	1,177	31.3%		2	22.2%	5.6%	304	23.1%	27.9%	3	33.3%	7.3%	490	47.2%	25.0%	2	20.0%	383	27.3%			
		\$250,001 - \$1 Million	4	14.3%	1,644	43.7%		1	11.1%	2.2%	708	53.7%	30.7%	1	11.1%	4.3%	260	25.0%	44.8%	2	20.0%	676	48.1%			
		Total	28	100%	3,761	100%		9	100%	100%	1,318	100%	100%	9	100%	100%	1,038	100%	100%	10	100%	1,405	100%			
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	75.0%	432	45.7%		3	100.0%		75	100.0%		2	50.0%		117	23.6%		4	80.0%	240	63.8%			
		\$100,001 - \$250,000	2	16.7%	254	26.8%		0	0.0%		0	0.0%		1	25.0%		118	23.8%		1	20.0%	136	36.2%			
		\$250,001 - \$1 Million	1	8.3%	260	27.5%		0	0.0%		0	0.0%		1	25.0%		260	52.5%		0	0.0%	0	0.0%			
		Total	12	100%	946	100%		3	100%		75	100%		4	100%		495	100%		5	100%	376	100%			
SMALL FARM	Revenue	\$1 Million or Less	1	50.0%	6	7.0%	100.0%	1	100.0%	60.0%	6	100.0%	57.2%	0	0.0%	69.4%	0	0.0%	88.1%	0	0.0%	0	0.0%			
		Over \$1 Million	1	50.0%	80	93.0%	0.0%	0	0.0%		0	0.0%		1	100.0%		80	100.0%		0	0.0%	0	0.0%			
		Total Rev. available	2	100.0%	86	100.0%	100.0%	1	100.0%		6	100.0%		1	100.0%		80	100.0%		0	0.0%	0	0.0%			
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%			
		Total	2	100%	86	100%	100%	1	100%		6	100%		1	100%		80	100%		0	0.0%	0	0.0%			
	Loan Size	\$100,000 or Less	2	100.0%	86	100.0%		1	100.0%	93.3%	6	100.0%	63.9%	1	100.0%	86.1%	80	100.0%	39.5%	0	0.0%	0	0.0%			
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	4.4%	0	0.0%	16.6%	0	0.0%	8.3%	0	0.0%	26.4%	0	0.0%	0	0.0%			
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	2.2%	0	0.0%	19.5%	0	0.0%	5.6%	0	0.0%	34.1%	0	0.0%	0	0.0%			
		Total	2	100%	86	100%		1	100%	100%	6	100%	100%	1	100%	100%	80	100%	100%	0	0.0%	0	0.0%			
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	6	100.0%		1	100.0%		6	100.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%			
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%			
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%			
		Total	1	100%	6	100%		1	100%		6	100%		0	0.0%		0	0.0%		0	0.0%	0	0.0%			

Originations & Purchases  
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue  
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information