

PUBLIC DISCLOSURE

March 25, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**NobleBank & Trust
1509 Quintard Avenue
Anniston, Alabama 36201**

RSSD ID NUMBER: 3385744

**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 Lending Test is rated: Satisfactory .

The Community Development Test is rated: Outstanding .

The following table indicates the performance level of NobleBank & Trust with respect to the Lending and Community Development Tests.

PERFORMANCE LEVELS	NobleBank & Trust	
	PERFORMANCE TESTS	
	Lending Test	Community Development Test
Outstanding		X
Satisfactory	X	
Needs to Improve		
Substantial Noncompliance		

*Note: The Lending Test and the Community Development Test are weighted equally when arriving at an overall rating.

Major factors supporting the institution’s rating include:

- The bank’s LTD ratio is reasonable.
- A majority of loans were made inside the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- Considering the bank’s asset size, capacity, and the availability of community development (CD) opportunities, the level of qualified CD loans, investments, donations, and services reflects excellent responsiveness to CD needs in its assessment areas.
- Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

INSTITUTION

SCOPE OF EXAMINATION

The CRA Performance Evaluation assesses the bank's record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined assessment areas (AAs). NobleBank & Trust's CRA performance evaluation was based on CRA activities within its AAs using the Interagency Intermediate Small Institution Examination Procedures. Under these procedures, institutions meeting the threshold size are evaluated using two separately rated tests: a Lending Test and a CD Test that includes an evaluation of CD loans, investments, and services in light of community needs within its AAs and the capacity of the bank.

NobleBank & Trust's CRA rating was determined by conducting a full-scope review of one of its three AAs: Anniston, Alabama, which is in an MSA. When determining the overall rating, the greatest weight was placed on performance in the Anniston AA as it includes the majority of the bank's lending and deposits as well as the majority of its branches. Limited-scope reviews were conducted on the remaining two AAs. The ratings in the limited-scope review AAs did not affect the overall CRA rating for the bank. AA details are described in the *Description of Institution* section for each AA.

Given the bank's asset size and offices located in an MSA, it submits annual reports regarding its residential real estate loan originations and applications, pursuant to the HMDA. These loans are referred to as HMDA-reportable loans in this evaluation. Based on asset size, the bank is not required to report small business/small farm loan data. 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. CRA small farm loans were not considered in the overall assessment due to minimal lending volume.

The Lending Test evaluation included an analysis of the bank's average LTD ratio from March 31, 2018 through December 31, 2022. It also included an analysis of small business loans using sampling guidelines and an analysis of the universe of HMDA-reportable loans, all originated from January 1, 2021 through December 31, 2022. Although HMDA-reportable loans represented a higher volume (both by number and dollar), the bank's strategic focus is on small business lending, so this loan product was given greater weight in evaluating lending performance, followed by HMDA-reportable lending.

For the CD test, the examination covered CD loans, qualified investments, and CD services from July 1, 2018 through September 30, 2023. The CRA defines a CD activity as having a primary purpose of providing any of the following: affordable housing or community services for LMI persons; promoting economic development through the financing of small businesses; or revitalizing or stabilizing LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies that benefit the AA or a larger statewide or regional area that includes the AAs.

As part of this evaluation, one community contact was made with a local economic development representative who is familiar with the economic and demographic characteristics as well as CD opportunities in Anniston AA. Information obtained from the contact was used to establish a context for the communities in which the bank operates and to gather information on its performance. Specific information obtained from the community contact is included in the applicable section of the evaluation for each AA. The contact did not identify any unmet credit needs.

DESCRIPTION OF INSTITUTION

NobleBank is community bank headquartered in Anniston, Alabama. The bank is a wholly-owned subsidiary of Noble Bancshares, Inc., which is also headquartered in Anniston, Alabama.

Branch Offices

The bank operates six branches in its AAs: zero branches in low-income tracts, three branches in moderate-income tracts, one branch in a middle-income tract, and two branches in upper-income tracts. Six branches have ATMs and there is one stand-alone ATM in the bank’s AA. The bank has not opened or closed any branches during the review period; however, one branch was opened in the period between the previous exam and the current review period.

Loan Portfolio

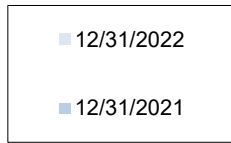
According to the December 31, 2022 Report of Condition, assets totaled \$399.8 million, an increase of approximately \$174.2 million (77.3 percent) since the previous CRA evaluation conducted on December 3, 2018.

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

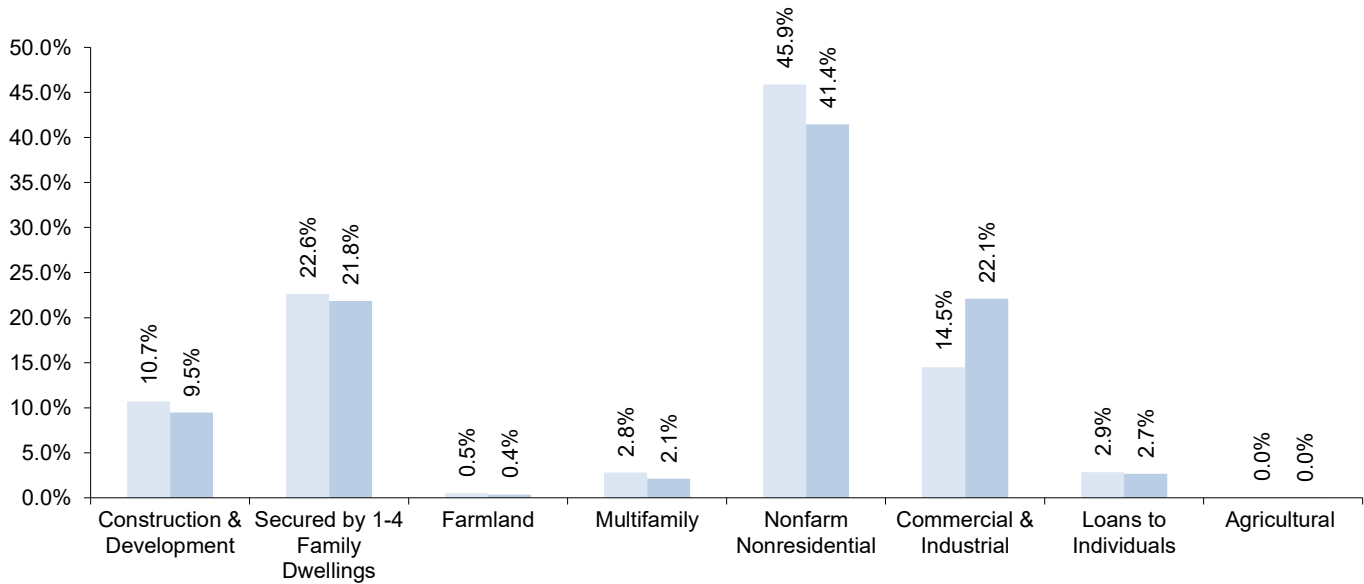
COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2022		12/31/2021		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	24,990	10.7%	20,664	9.5%	20.9%
Secured by One- to Four- Family Dwellings	52,787	22.6%	47,715	21.8%	10.6%
Other Real Estate: Farmland	1,259	0.5%	827	0.4%	52.2%
Multifamily	6,570	2.8%	4,614	2.1%	42.4%
Nonfarm nonresidential	107,052	45.9%	90,570	41.4%	18.2%
Commercial and Industrial	33,865	14.5%	48,265	22.1%	-29.8%
Loans to Individuals	6,677	2.9%	5,831	2.7%	14.5%
Agricultural Loans	99	0.0%	19	0.0%	421.1%
Total	\$233,299	100.00%	\$218,505	100.00%	6.8%

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

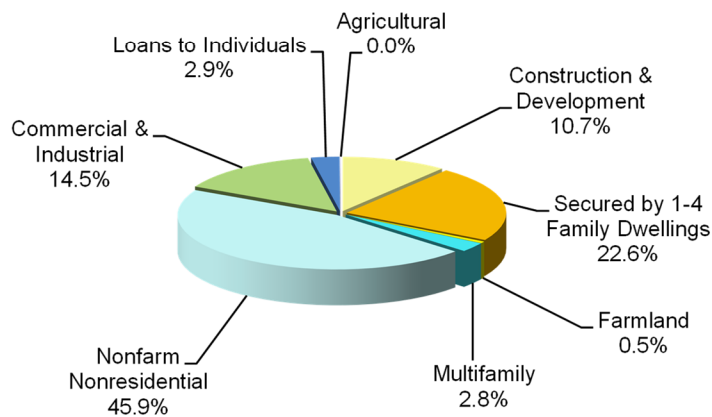
As shown, the loan portfolio experienced an increase of \$14.8 million (or 6.8 percent) between 2021 and 2022. As of December 31, 2022, loans secured by nonfarm nonresidential made up the largest percentage of the loan portfolio at 45.9 percent, followed by loans secured by one- to four-family dwellings at 22.6 percent of total loans, and loans secured by commercial and industrial at 14.5 percent.



Loan Portfolio Trend



Loan Portfolio as of 12/31/2022



Credit Products

NobleBank offers a variety of consumer and commercial loan products to meet the credit needs of individuals and businesses in its AAs. The bank offers the following types of credit products: personal loans (including installment loans, secured and unsecured lines of credit, home equity lines of credit, automobile, land, and construction), agricultural loans, commercial loans (including SBA loans, lines of credit, vehicle/equipment loans, commercial real estate, and construction loans), mortgage loans in-house (single family and multifamily), and mortgage loans for sale on the secondary market.

Assessment Areas

For purposes of the CRA, NobleBank has defined the following three AAs:

- Anniston (Anniston, AL MSA) – entire county (Calhoun)
- Birmingham (Birmingham, AL MSA) – includes parts of Jefferson, St. Clair, and Shelby Counties, which are three of the six counties that comprise the MSA
- Cleburne-Talladega (non MSA) – includes all of Cleburne County and part of Talladega County

COVID-19 Response

NobleBank & Trust actively participated in the Paycheck Protection Program (PPP) in 2021. In the small business loan sample, the bank originated 69 PPP loans in 2021 for a total dollar amount of \$3.5 million; 69.6 percent of the PPP loans were inside the bank's AAs. The volume of PPP lending led to an increase in overall small business lending during the review period. For comparison, the small business loan sample for the review period included 94 non-PPP small business loans originations totaling 15.8 million; 79.8 percent of the non-PPP small business loans were in the bank's AAs.

NobleBank & Trust complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AAs. The bank received an "Outstanding" rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated December 3, 2018 under the Small Bank Examination Procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

NobleBank & Trust's overall performance rating for the Lending Test is satisfactory. The bank's LTD ratio is reasonable, and a majority of the loans by number and dollar amount were originated inside the AAs. The geographic distribution of loans is reasonable and the distribution of loans by business revenue size and borrower income level is reasonable. The bank has not received any CRA-related complaints since the previous examination. Performance context information such as demographics, economic conditions, competition, and business strategy and opportunities was considered in evaluating lending performance. Details on the distribution of small business lending and HMDA-reportable lending can be found in the full-scope AA section of this report.

Loan-to-Deposit Ratio

NobleBank & Trust's average LTD ratio for the 20 quarters ending December 31, 2022 is 67.7 percent, which is considered reasonable given the bank's size, financial condition, and AA credit needs. The bank's average LTD ratio was compared with average LTD ratios of four depository institutions of comparable asset size with branch offices in the bank's AAs. The average LTD ratios for these institutions ranged from 46.9 percent to 105 percent. Considering that the bank's average LTD ratio is only lower than one of the comparator financial institutions, performance is deemed reasonable given performance factors. The bank experienced a steady decline in its LTD

ratio beginning in the fourth quarter of 2020 while the COVID-19 pandemic continued to affect the U.S. economy. However, the ratio started rising in the fourth quarter of 2022. Performance has not yet returned to pre-pandemic levels but is improving. The bank’s LTD ratio ranged from a high of 79.5 percent as of June 30, 2020 to a low of 59.0 percent as of March 31, 2022.

Assessment Area Concentration

The bank originated a majority of loans (79.4 percent by number) of its total loans to borrowers and businesses residing in or located within the bank’s AAs. The table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside of the bank’s AAs.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	9	69.2	\$395	45.5	4	30.8	\$473	54.5
Home Purchase - Conventional	104	83.2	\$10,858	58.9	21	16.8	\$7,572	41.1
Multi-Family Housing	11	78.6	\$4,723	89.5	3	21.4	\$552	10.5
Other Purpose Closed-End	8	100.0	\$477	100.0	0	0.0	\$0	0.0
Refinancing	41	82.0	\$4,679	63.4	9	18.0	\$2,702	36.6
Total HMDA related	173	82.4	\$21,132	65.2	37	17.6	\$11,299	34.8
Small Business	123	75.5	\$15,481	80.4	40	24.5	\$3,770	19.6
Total Small Bus. related	123	75.5	\$15,481	80.4	40	24.5	\$3,770	19.6
TOTAL LOANS	296	79.4	\$36,613	70.8	77	20.6	\$15,069	29.2

Note: Affiliate loans not included

As reflected in the above table, 82.4 percent (by number) and 65.2 percent (by dollars) of HMDA-reportable loans were originated within the bank’s AAs. Additionally, 75.5 percent (by number) and 80.4 percent (by dollars) of a sample of small business loans were originated within the bank’s AAs. This level of lending indicates the bank’s willingness to originate loans that meet the credit needs of its AAs.

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

For this analysis, the geographic and borrower distribution of small business lending and HMDA-reportable lending was compared to available demographic and aggregate information, as applicable. Performance context information was also taken into consideration. Considering these factors, the overall geographic distribution of small business loans and HMDA-reportable loans reflects a reasonable dispersion throughout the AAs, given the opportunity and competition in these markets. The overall distribution of lending to borrowers reflects reasonable penetration to businesses of different sizes and among individuals of different income levels, given the product lines offered. The analyses of small business lending and HMDA-reportable lending within each AA are discussed in detail later in this report. Performance context was taken into consideration.

COMMUNITY DEVELOPMENT TEST

The bank’s CD Test rating is outstanding. Considering its capacity, the level of competition, and the need for and availability of opportunities in the AAs, the bank demonstrates excellent responsiveness to CD needs through a combination of CD loans, investments, qualified donations, and CD services. The bank’s performance is summarized in the following table with additional descriptions of activities below.

Summary of Community Development Activities							
AA	Loans		Investments		Contributions		Service Hours
	#	\$	#	\$	#	\$	
Anniston	2	\$1,170,209	0	\$0	24	\$234,045	674
Birmingham	2	\$5,000,000	0	\$0	2	\$14,000	213
Cleburne-Talladega	1	\$1,309,787	0	\$0	4	\$24,000	159
BSRA Includes*	0	\$0	7	\$3,860,000	11	\$57,143	143
Anniston AA/Cleburne – Talladega AA/ Birmingham AA	0		7	\$3,860,000			108
BSRA Doesn't Include AAs - In Alabama**	15	\$113,605	14	\$9,227,221	1	\$600	35
Outside Alabama***	1	\$8,914	1	\$1,000,000	0	\$0	0
Total	21	\$7,602,514	22	\$14,087,221	42	\$329,788	1,224

*Broader Statewide or Regional Area (BSRA) that includes one or more of the bank’s AAs. The BSRA activities above benefitted one or more of Anniston AA, Birmingham AA, Cleburne-Talladega AA. Conclusions in these AAs were positively impacted by BSRA totals.

**BSRA in Alabama that does not include one or more of the bank’s AAs.

***Benefitted states that are outside the bank’s AAs and do not include the state of Alabama

During the review period, the bank originated 21 CD loans totaling \$7.6 million; 22 qualified investments totaling \$14.1 million; 42 qualified donations totaling \$329,788; and engaged in 1,224 hours of CD services. Activities qualified for a variety of CD purposes, including affordable housing and community services for LMI people, promoting economic development, and revitalization and stabilization.

Some CD activities were noted as particularly responsive to AA needs. One loan for \$1.2 million was provided to an organization supporting revitalization and stabilization efforts essential to the emergency infrastructure of Calhoun County, including LMI portions in the Anniston AA. Sixteen of the 21 loans totaling \$124,535.83 were loan participation pools from the Alabama Multifamily Loan Consortium (AMLC) in which the bank financed pro rata shares of permanent mortgages for affordable multifamily housing developments. The mission of AMLC includes facilitating the development and preservation of affordable housing for LMI persons and combating community deterioration.¹ The AMLC loans primarily benefit the broader statewide or regional area that does

¹Alabama Multifamily Loan Consortium Celebrates 20th Anniversary. Alabama Housing Finance Authority, https://apt.ahfa.com/Articles/alabama_multifamily_loan_consortium_celebrates_20th_anniversary.aspx. Accessed 14 Mar. 2024.

not include one or more of the bank's AAs. Also, the bank made two loans totaling \$5 million to an organization that provides community services to LMI individuals in the Birmingham AA. The primary purpose of the entity is to place vulnerable children into families via adoption and foster care services and provide shelter, food, and essentials for children and families in need. Lastly, the bank made one CD loan for \$1.31 million that funded transportation needs for LMI students in the Cleburne – Talladega AA, which included the purchase of 16 new 72-passenger school buses.

Of the \$14.1 million in investments, the majority are municipal bonds, which all have a CD purpose of benefiting LMI geographies and individuals. Five investments totaling approximately \$2.9 million support economic development, including a \$1.0 million investment in a certified low-income credit union to fund capital for expansion and development, and four investments support school boards serving LMI students in the broader statewide or regional area that includes the Anniston and Cleburne-Talladega AAs. In addition, three investments totaling approximately \$3.6 million support affordable housing for LMI individuals benefiting the broader statewide or regional area.

Of the total contribution amount, \$234,045 benefited the Anniston AA, including \$74,000 in donations to an organization that provides financial assistance to LMI individuals for utilities, rent, transportation, prescriptions, and other needs with the goal of preventing homelessness; \$85,000 in donations to an organization that provides educational and other services to LMI students in Oxford City School District; \$37,000 in donations to a 501(c)(3) non-profit charitable organization dedicated to assisting homeless and low-income individuals and families with securing safe, decent, affordable shelter; and \$34,500 in donations to a university that provides services to LMI individuals. In the Birmingham and Cleburne AAs, the bank made donations of \$14,000 and \$24,000 in nonprofit organizations that provide services to LMI individuals and supports small businesses, educational entities, workforce development programs, and wellness providers.

Of the 1,224 CD service hours, 674 benefited the Anniston AA. The remaining service hours benefited the Birmingham AA and the broader statewide or regional areas that include the Anniston, Cleburne-Talladega, and Birmingham AAs. A majority of the hours were focused on fundraising efforts for organizations that benefit LMI individuals and small businesses. Staff also provided technical expertise by serving as board or committee members, primarily at organizations with a primary purpose of CD, and engaged in providing community services targeted to LMI individuals and small businesses.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

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 – ANNISTON, ALABAMA
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ANNISTON ASSESSMENT AREA

Overview

The AA has changed since the previous examination. As noted previously, the AA includes all of Calhoun County, which makes up the Anniston – Oxford, AL MSA. The previous Anniston AA included Calhoun County and parts of Cleburne and Talladega counties, which are not in an MSA. In 2019, the bank added tracts in Cleburne County to comprise a full county prior to the opening of a new branch in 2020 in Heflin, Alabama, which is located in Cleburne County. As a result, the two non MSA counties, Cleburne and Talladega, are no longer part of the Anniston AA, and became the new Cleburne-Talladega AA.

Population and Income Characteristics

According to the 2020 US Census, the population in the AA totaled 116,441 people, which is a decrease of 0.2 percent since 2015. For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income (MFI) for the relevant area. The following table sets forth the estimated MFI for 2021 and 2022 for the Anniston – Oxford, AL MSA. It also provides a breakdown of the estimated annual income based on income-level (low, moderate, middle, and upper).

**Borrower Income Levels
Anniston-Oxford, AL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2021	\$63,700	0	- \$31,849	\$31,850	- \$50,959	\$50,960	- \$76,439	\$76,440	- & above
2022	\$68,800	0	- \$34,399	\$34,400	- \$55,039	\$55,040	- \$82,559	\$82,560	- & above

The HUD estimated MFI for the Anniston-Oxford, AL MSA was \$63,700 in 2021 and \$68,800 in 2022, reflecting an increase of \$5,100 or 8.0 percent. According to 2022 Census data, there were 29,120 families in the AA. Of those families, 20.8 percent were low-income, 17.4 percent were moderate-income, 20.3 percent were middle-income, and 41.5 percent were upper-income. Of the total families, 10.7 percent had incomes below the poverty level.

Housing Characteristics

According to 2022 Census data, there were 53,722 total housing units in the AA, of which 58.4 percent were owner-occupied, 24.6 percent were rental units, and 17.0 percent were vacant. In the AA, the median age of housing stock was 47 years, the median housing value was \$121,628, and the median monthly gross rent was \$720. Comparatively for the state of Alabama, the median age of housing stock was lower than the AA at 36 years and the median housing value at \$149,600 and the median monthly gross rent at \$811 were both higher than the AA. The housing affordability ratio, defined as the median household income divided by the median housing value, was 41.2 in the AA compared to the state of Alabama at 34.8. A higher ratio means the housing is considered more affordable, while a lower ratio means the housing is considered less affordable; therefore, data indicates that housing is more affordable in the AA than for the state of Alabama.

Economic Conditions and Employment

According to the Bureau of Labor Statistics data for 2022, the industries that employed the most people in the AA were manufacturing (7,135), retail trade (6,109), accommodation and food services (4,603), and health care and social assistance (3,984).

Anniston Army Depot is the largest employer in Calhoun County with more than 4,000 employees. The Depot is under the jurisdiction of the U.S. Army Materiel Command and is a maintenance complex recognized for vehicle and weapons expertise. Major tenants include the Anniston Munitions Center and the Defense Logistics Agency Distribution, which store and ship defense materials.² Along with Anniston Army Depot, several companies related to the automotive industry are among the largest manufacturing employers, including: New Flyer, which manufactures transit buses; Bridgewater Interiors, which makes automotive seating systems; International Automotive Components, which makes interior automotive systems; General Dynamics Land Systems, which builds armored vehicles; and BAE Systems, which performs military vehicle rehabilitation.³

Calhoun County also is the home of the Federal Emergency Management Agency's (FEMA) Center for Domestic Preparedness (CDP). Training provided by the CDP is federally funded at no cost to state, local, tribal, and territorial emergency response professionals or their agencies.⁴ The CDP is also a major economic driver in the area; recent economic research shows the CDP contributes \$255 million annually to the economy of Calhoun County and has a \$290 million annual economic impact on the state of Alabama.⁵ Calhoun County also has a new federal courthouse, which opened in May 2022, and is home to the United States District Court for the Northern District of Alabama and the Bankruptcy Court of Northern Alabama as well as provides workspace for the United States Marshal Service and the United States Attorney's Office.⁶

Also in Anniston is McClellan, once an Army base and now a 10,000-acre master-planned community offering residential, commercial, industrial, retail, education, technology, and research development. It is managed by the McClellan Development Authority, a non-profit corporation charged with future economic development. Amenities include a public golf course, athletic fields, an aquatic and wellness center and gymnasiums with programs for all ages.⁷

The Anniston AA is also home to two institutions of higher learning: Jacksonville State University and Gadsden State - Ayers Campus. Jacksonville State University is a public university that offers 95 academic programs at the bachelor's, master's and doctoral levels, including more than 40 online programs. The Gadsden State - Ayers Campus serves approximately 700 students, offers general studies as well as accounting, computer science, office administration and child development, and is home to two programs not offered at other Gadsden State campuses - the Mobility Nursing Program and the Alabama Federation for Advanced Manufacturing Education, also known as FAME.⁸

The city of Oxford redeveloped its historic downtown and the Choccolocco Park-Oxford Sport Complex hosts sports events, including college softball and all levels of baseball. In the summer of 2022, the Choccolocco

² Spotlight on Calhoun & Talladega: Economic Engines. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-economic-engines/>. Accessed 13 Mar. 2024.

³ Spotlight on Calhoun & Talladega: Economic Engines. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-economic-engines/>. Accessed 13 Mar. 2024.

⁴ Center for Domestic Preparedness. *Federal Emergency Management Agency*, <https://www.fema.gov/node/center-domestic-preparedness>. Accessed 18 Mar. 2024

⁵ Spotlight on Calhoun & Talladega: Economic Engines. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-economic-engines/>. Accessed 13 Mar. 2024.

⁶ Spotlight on Calhoun & Talladega: Community Development. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-community-development/>. Accessed 12 Mar. 2024.

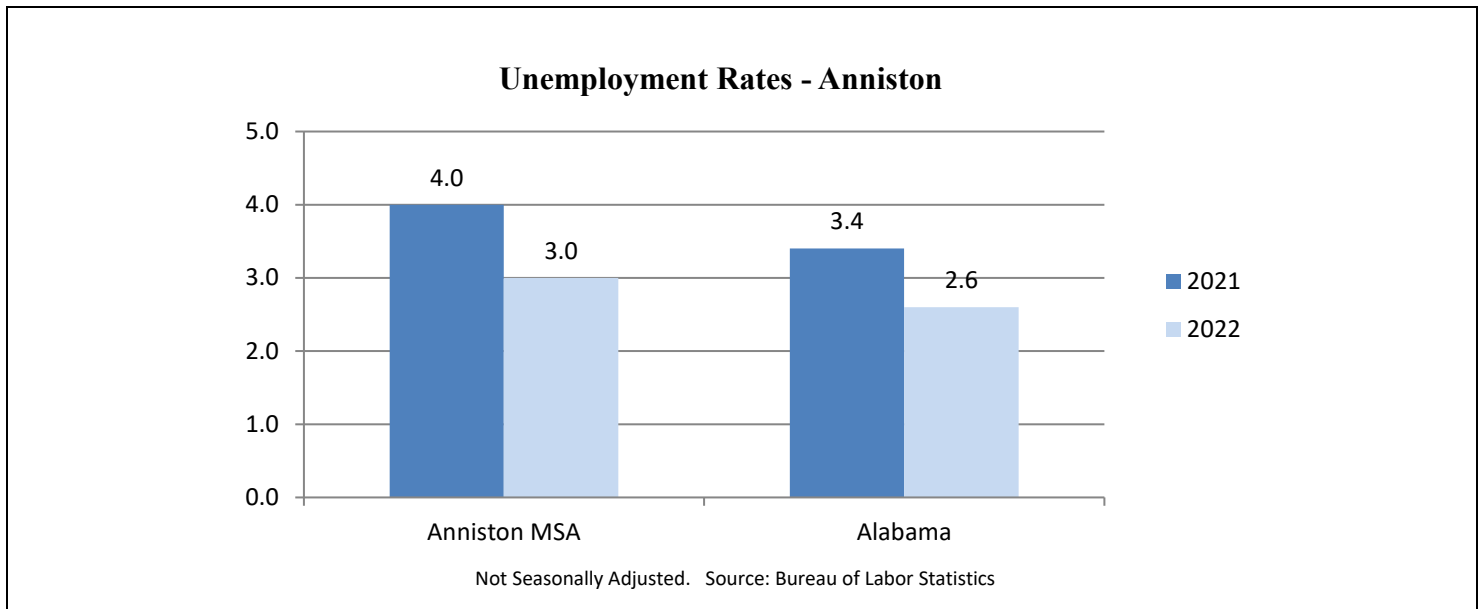
⁷ Spotlight on Calhoun & Talladega: Economic Engines. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-economic-engines/>. Accessed 13 Mar. 2024.

⁸ Spotlight on Calhoun & Talladega: Higher Education. *Business Alabama*, <https://businessalabama.com/spotlight-on-calhoun-talladega-higher-education/>. Accessed 13 Mar. 2024.

Monsters, a new summer collegiate baseball team in the Sunbelt Baseball League, located in Oxford. The Monsters took part in the Sunbelt Baseball League for the 2022 season, which is partially funded by Major League Baseball.⁹

Residents in Calhoun County and seven other counties in the state of Alabama were impacted by severe storms, and tornadoes on March 25 and March 26, 2021, and Calhoun County was one of the eight counties that was designated eligible for FEMA’s Individual Assistance program under the major disaster declaration signed by President Biden on April 26, 2021 for damage and losses from the March tornadoes.¹⁰

The following table shows the unemployment rates for the Anniston MSA and the state of Alabama for 2021 and 2022. The table shows that the unemployment rate for the AA decreased from 4.0 percent in 2021 to 3.0 percent in 2022. The unemployment rate for the state of Alabama experienced a similar trend, decreasing from 3.4 percent in 2021 to 2.6 percent in 2022.



Competition

According to the June 30, 2022, FDIC Summary of Deposits Report, NobleBank & Trust ranks 4th out of 10 financial institutions operating in the AA with a 12.8 percent deposit market share. The top financial institution by deposit market share is Southern States Bank with 19.2 percent deposit market share, followed by Regions Bank with 18.9 percent, and Wells Fargo with 15.6 percent.

HMDA-reportable lending is competitive with 220 HMDA reporters operating in the AA in 2022. NobleBank & Trust ranked 16th with 1.7 percent of all HMDA-reportable loans in 2022. Fairway Independent Mortgage Corporation had the largest share of HMDA-reportable loan originations and purchases at 7.7 percent, followed by Rocket Mortgage, LLC at 7.1 percent. Large lenders including PennyMac, Regions Bank, and Ameris Bank are also active HMDA lenders in the AA.

⁹ Choccolocco Monsters in the Park. *Choccolocco Park*, <https://choccoloccopark.com/blog/choccolocco-monsters-in-the-park>. Accessed 14 Mar. 2024.

¹⁰ Eight Counties Can Apply for FEMA Disaster Assistance from the March Tornadoes. *Federal Emergency Management Agency*, <https://www.fema.gov/press-release/20210427/eight-counties-can-apply-fema-disaster-assistance-march-tornadoes>. Accessed 14 Mar. 2024.

Community Contact

As part of the CRA examination, information was obtained from a local economic development representative operating in the AA. The contact discussed economic conditions, general housing, and CD needs for the AA. The contact indicated that since the pandemic, the biggest need in the AA is affordable housing. According to the contact, the AA did not experience tremendous unemployment during the pandemic. Manufacturing companies in the AA were growing and the focus was primarily on getting people back to work and attracting new employees through job fairs and other recruiting efforts. The contact stated that financial institutions in the area consisting of small community and regional banks are meeting the general banking and credit needs of businesses. Some of the locally-owned manufacturers deal with the local community banks. The larger manufacturers/multinational organizations tend to work with the regional/larger banks. In addition, financial institutions are responsive to the special credit needs of small businesses (e.g., SBA 504 loans). Businesses also have other options for obtaining unique financing. The East Alabama Regional Planning Commission has a revolving loan fund and Jacksonville State University has a Small Business Development Center (SBDC) located in Anniston; both assist current and prospective small business owners in the AA.

The contact mentioned that one of the biggest challenges is retaining young talent in the Anniston AA, primarily due to a lack of affordable housing. There are CD projects underway in the downtown/Main Street area of The City of Oxford and Anniston. Both projects involve revitalizing the area (e.g., with restaurants, shopping, etc.). The contact stated that these are great opportunities for local financial institutions to participate.

Overall, the contact noted there is a good distribution of both community and regional/large banks that do well at meeting the needs of businesses in the area. When asked what banks are responsive to the CD and credit needs of the community, the contact mentioned NobleBank & Trust and several other community banks in the AA.

Assessment Area Demographics

The following tables provide demographic characteristics of the bank's AA used to analyze the bank's CRA performance. The first table is based on 2021 FFIEC census data and 2021 Dun and Bradstreet (D&B) information used for the analysis of 2021 CRA performance. The second table is based on 2022 FFIEC census data and 2022 D&B information used for analysis of 2022 CRA performance. As shown in the tables, in 2021 the AA had a total of 31 tracts, including three low-income tracts, seven moderate-income tracts, 14 middle-income tracts, three upper-income tracts, and four tracts with unknown income. In 2022, the total number of tracts increased to 38 and changes included: low-income tracts decreased to one, moderate-income tracts increased to nine, middle-income tracts increased to 18, upper-income tracts increased to six, and the unknown income tracts remained at four.

Combined Demographics Report - 2021

Assessment Area: Anniston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	9.7%	1,248	4.1%	717	57.5%	6,999	22.9%
Moderate-income	7	22.6%	4,888	16.0%	1,262	25.8%	4,963	16.2%
Middle-income	14	45.2%	20,718	67.7%	2,554	12.3%	6,386	20.9%
Upper-income	3	9.7%	3,420	11.2%	430	12.6%	12,233	40.0%
Unknown-income	4	12.9%	307	1.0%	79	25.7%	0	0.0%
Total Assessment Area	31	100.0%	30,581	100.0%	5,042	16.5%	30,581	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,560	983	3.2%	27.6%	1,449	40.7%	1,128	31.7%
Moderate-income	10,235	4,731	15.2%	46.2%	3,716	36.3%	1,788	17.5%
Middle-income	32,612	21,618	69.3%	66.3%	6,781	20.8%	4,213	12.9%
Upper-income	5,463	3,694	11.8%	67.6%	1,077	19.7%	692	12.7%
Unknown-income	1,426	153	0.5%	10.7%	952	66.8%	321	22.5%
Total Assessment Area	53,296	31,179	100.0%	58.5%	13,975	26.2%	8,142	15.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	186	4.9%	165	4.8%	18	6.1%	3	10.0%
Moderate-income	1,190	31.5%	1,049	30.4%	130	43.9%	11	36.7%
Middle-income	2,032	53.8%	1,894	54.9%	127	42.9%	11	36.7%
Upper-income	297	7.9%	281	8.1%	12	4.1%	4	13.3%
Unknown-income	74	2.0%	64	1.9%	9	3.0%	1	3.3%
Total Assessment Area	3,779	100.0%	3,453	100.0%	296	100.0%	30	100.0%
Percentage of Total Businesses:			91.4%		7.8%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	1.3%	1	1.3%	0	0.0%	0	0.0%
Moderate-income	12	15.2%	12	15.2%	0	0.0%	0	0.0%
Middle-income	59	74.7%	59	74.7%	0	0.0%	0	0.0%
Upper-income	6	7.6%	6	7.6%	0	0.0%	0	0.0%
Unknown-income	1	1.3%	1	1.3%	0	0.0%	0	0.0%
Total Assessment Area	79	100.0%	79	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:			100.0%		0.0%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

Combined Demographics Report - 2022

Assessment Area: Anniston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.6%	576	2.0%	107	18.6%	6,052	20.8%
Moderate-income	9	23.7%	4,539	15.6%	739	16.3%	5,076	17.4%
Middle-income	18	47.4%	16,598	57.0%	1,822	11.0%	5,905	20.3%
Upper-income	6	15.8%	7,205	24.7%	390	5.4%	12,087	41.5%
Unknown-income	4	10.5%	202	0.7%	52	25.7%	0	0.0%
Total Assessment Area	38	100.0%	29,120	100.0%	3,110	10.7%	29,120	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,702	609	1.9%	35.8%	673	39.5%	420	24.7%
Moderate-income	10,938	4,538	14.5%	41.5%	4,017	36.7%	2,383	21.8%
Middle-income	29,482	18,334	58.4%	62.2%	6,280	21.3%	4,868	16.5%
Upper-income	10,688	7,555	24.1%	70.7%	2,074	19.4%	1,059	9.9%
Unknown-income	912	334	1.1%	36.6%	158	17.3%	420	46.1%
Total Assessment Area	53,722	31,370	100.0%	58.4%	13,202	24.6%	9,150	17.0%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	112	3.0%	99	2.9%	11	3.9%	2	5.9%
Moderate-income	765	20.5%	692	20.2%	67	23.8%	6	17.6%
Middle-income	2,093	56.0%	1,925	56.3%	148	52.5%	20	58.8%
Upper-income	728	19.5%	670	19.6%	55	19.5%	3	8.8%
Unknown-income	37	1.0%	33	1.0%	1	0.4%	3	8.8%
Total Assessment Area	3,735	100.0%	3,419	100.0%	282	100.0%	34	100.0%
Percentage of Total Businesses:			91.5%		7.6%		0.9%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	1.3%	1	1.3%	0	0.0%	0	0.0%
Moderate-income	10	13.0%	10	13.0%	0	0.0%	0	0.0%
Middle-income	44	57.1%	44	57.1%	0	0.0%	0	0.0%
Upper-income	22	28.6%	22	28.6%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	77	100.0%	77	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:			100.0%		0.0%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

Lending performance was evaluated using an analysis of a sample of small business loans and the universe of HMDA-reportable loans originated from January 1, 2021 through December 31, 2022. During that time, NobleBank & Trust originated 113 HMDA-reportable loans and the sample of small business loans included 60 loans in the AA. As noted previously, small business lending received greater weight for the Lending Test evaluation in the AA.

Geographic Distribution of Loans

The overall geographic distribution of loans reflects reasonable dispersion throughout the AA. For this analysis, the geographic distribution of small business loans and HMDA-reportable loans was compared to available demographic information. HMDA-reportable lending was also compared to the aggregate performance of lenders in the AA. Performance context issues were taken into consideration.

Small Business Lending

The following table shows the geographic distribution of small business loans made in the AA in 2021 and 2022. Based on performance across the two years of analysis, the geographic distribution of the bank’s small business loans reflects reasonable dispersion throughout the bank’s AA.

Geographic Distribution of Small Business Loans

Assessment Area: Anniston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	2	5.3%	66	2.6%	4.9%	0	0.0%	0	0.0%	3.0%
	Moderate	10	26.3%	403	16.2%	31.5%	3	13.6%	233	11.3%	20.5%
	Middle	23	60.5%	1,995	80.0%	53.8%	11	50.0%	1,370	66.5%	56.0%
	Upper	2	5.3%	22	0.9%	7.9%	8	36.4%	456	22.1%	19.5%
	Unknown	1	2.6%	8	0.3%	2.0%	0	0.0%	0	0.0%	1.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0	0.0%	
	<i>Total</i>	38	100%	2,494	100%	100%	22	100%	2,060	100%	100%

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

Within the 2021 small business loan sample, the bank originated a total of 38 loans, including two loans (5.3 percent) in low-income tracts, which is higher than the percentage of total businesses located in low-income tracts at 4.9 percent. Also, the bank originated 10 loans (26.3 percent) in moderate-income tracts, which is lower than the percentage of total businesses located in these tracts at 31.5 percent. This reflects reasonable performance in 2021. Within the sample in 2022, the bank originated zero loans in low-income tracts, which is lower than the percentage of total businesses located in these tracts at 3.0 percent. The bank originated three loans (13.6 percent) in moderate-income tracts, which is also lower than the percentage of total businesses located in these tracts at 20.5 percent. This reflects poor performance in 2022.

Residential Real Estate (HMDA) Lending

The following tables show the geographic distribution of HMDA-reportable loans in 2021 and 2022 in the AA. The table includes demographic information and a comparison of bank lending to the aggregate lending activity reported by all HMDA lenders within the AA. As presented, the bank’s lending performance for geographic distribution of HMDA lending reflects excellent dispersion throughout the bank’s AA.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Anniston

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data															
		2021							2022								
		Count			Dollar				Owner Occupied Units %	Count			Dollar				Owner Occupied Units %
		Bank #	Agg %	Bank %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Bank #		Agg %	Bank %	Bank \$ (000s)	Agg \$ %	Bank \$ %			
HOME PURCHASE	Low	4	8.7%	0.6%	204	6.2%	0.2%	3.2%	1	5.3%	0.5%	19	0.9%	0.2%	1.9%		
	Moderate	21	45.7%	14.3%	968	29.2%	10.2%	15.2%	5	26.3%	11.2%	406	19.8%	8.3%	14.5%		
	Middle	18	39.1%	71.8%	1,733	52.3%	74.6%	69.3%	6	31.6%	61.3%	537	26.2%	58.6%	58.4%		
	Upper	3	6.5%	13.0%	409	12.3%	14.6%	11.8%	7	36.8%	26.7%	1,090	53.1%	32.9%	24.1%		
	Unknown	0	0.0%	0.3%	0	0.0%	0.3%	0.5%	0	0.0%	0.2%	0	0.0%	0.1%	1.1%		
	<i>Total</i>	<i>46</i>	<i>100%</i>	<i>100%</i>	<i>3,314</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>19</i>	<i>100%</i>	<i>100%</i>	<i>2,052</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
REFINANCE	Low	0	0.0%	0.1%	0	0.0%	0.0%	3.2%	0	0.0%	0.8%	0	0.0%	0.5%	1.9%		
	Moderate	2	22.2%	8.4%	110	11.7%	7.0%	15.2%	3	18.8%	10.2%	272	22.3%	9.1%	14.5%		
	Middle	7	77.8%	77.7%	827	88.3%	79.4%	69.3%	9	56.3%	61.7%	715	58.6%	60.4%	58.4%		
	Upper	0	0.0%	13.6%	0	0.0%	13.5%	11.8%	4	25.0%	27.1%	233	19.1%	29.9%	24.1%		
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.5%	0	0.0%	0.2%	0	0.0%	0.1%	1.1%		
	<i>Total</i>	<i>9</i>	<i>100%</i>	<i>100%</i>	<i>937</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>16</i>	<i>100%</i>	<i>100%</i>	<i>1,220</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
HOME IMPROVEMENT	Low	0	0.0%	2.2%	0	0.0%	0.7%	3.2%	0	0.0%	3.1%	0	0.0%	1.6%	1.9%		
	Moderate	0	0.0%	12.1%	0	0.0%	8.7%	15.2%	0	0.0%	11.2%	0	0.0%	11.0%	14.5%		
	Middle	4	100.0%	71.4%	202	100.0%	78.0%	69.3%	2	66.7%	58.2%	62	57.4%	55.6%	58.4%		
	Upper	0	0.0%	12.1%	0	0.0%	9.0%	11.8%	1	33.3%	27.6%	46	42.6%	31.8%	24.1%		
	Unknown	0	0.0%	2.2%	0	0.0%	3.6%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.1%		
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>202</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>108</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
MULTI FAMILY	Low	0	0.0%	4.3%	0	0.0%	0.4%	15.5%	0	0.0%	9.1%	0	0.0%	3.0%	5.9%		
	Moderate	2	40.0%	30.4%	658	32.0%	11.7%	22.3%	0	0.0%	13.6%	0	0.0%	7.0%	46.7%		
	Middle	2	40.0%	34.8%	1,212	59.0%	27.9%	36.9%	4	100.0%	59.1%	1,437	100.0%	30.4%	25.5%		
	Upper	0	0.0%	8.7%	0	0.0%	26.6%	8.0%	0	0.0%	18.2%	0	0.0%	59.6%	21.3%		
	Unknown	1	20.0%	21.7%	184	9.0%	33.4%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	0.6%		
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>2,054</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>1,437</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
OTHER PURPOSE LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	3.2%	0	0.0%	4.5%	0	0.0%	2.9%	1.9%		
	Moderate	0	0.0%	9.5%	0	0.0%	7.4%	15.2%	0	0.0%	4.5%	0	0.0%	2.1%	14.5%		
	Middle	0	0.0%	81.0%	0	0.0%	87.4%	69.3%	0	0.0%	53.7%	0	0.0%	60.0%	58.4%		
	Upper	0	0.0%	9.5%	0	0.0%	5.2%	11.8%	0	0.0%	37.3%	0	0.0%	34.9%	24.1%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.1%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Anniston

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data															
		2021							2022								
		Count			Dollar				Owner Occupied Units	Count			Dollar				Owner Occupied Units
		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	Bank %		Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	7.7%	0	0.0%	1.4%	3.2%	0	0.0%	0.0%	0	0.0%	0.0%	1.9%		
	Moderate	0	0.0%	11.5%	0	0.0%	5.0%	15.2%	0	0.0%	6.3%	0	0.0%	4.9%	14.5%		
	Middle	1	50.0%	69.2%	26	66.7%	88.5%	69.3%	3	60.0%	59.4%	118	49.6%	45.9%	58.4%		
	Upper	1	50.0%	11.5%	13	33.3%	5.1%	11.8%	2	40.0%	34.4%	120	50.4%	49.2%	24.1%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.1%		
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>39</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>238</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	3.2%	0	0.0%	2.1%	0	0.0%	1.3%	1.9%		
	Moderate	0	0.0%	22.0%	0	0.0%	17.8%	15.2%	0	0.0%	19.1%	0	0.0%	11.4%	14.5%		
	Middle	0	0.0%	72.0%	0	0.0%	77.0%	69.3%	0	0.0%	66.0%	0	0.0%	75.6%	58.4%		
	Upper	0	0.0%	4.0%	0	0.0%	4.0%	11.8%	0	0.0%	12.8%	0	0.0%	11.7%	24.1%		
	Unknown	0	0.0%	2.0%	0	0.0%	1.1%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.1%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
HMDA TOTALS	Low	4	6.1%	0.5%	204	3.1%	0.1%	3.2%	1	2.1%	0.9%	19	0.4%	0.4%	1.9%		
	Moderate	25	37.9%	11.7%	1,736	26.5%	8.9%	15.2%	8	17.0%	10.8%	678	13.4%	8.4%	14.5%		
	Middle	32	48.5%	74.3%	4,000	61.1%	75.4%	69.3%	24	51.1%	61.2%	2,869	56.8%	57.7%	58.4%		
	Upper	4	6.1%	13.1%	422	6.4%	14.3%	11.8%	14	29.8%	26.9%	1,489	29.5%	33.3%	24.1%		
	Unknown	1	1.5%	0.4%	184	2.8%	1.3%	0.5%	0	0.0%	0.2%	0	0.0%	0.1%	1.1%		
	<i>Total</i>	<i>66</i>	<i>100%</i>	<i>100%</i>	<i>6,546</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>47</i>	<i>100%</i>	<i>100%</i>	<i>5,055</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

As shown in the table above, the bank originated four HMDA-reportable loans (6.1 percent) in low-income tracts. Bank performance was above both the percentage of owner-occupied units (3.2 percent) and aggregate lending (0.5 percent). Also, the bank originated 25 HMDA-reportable loans (37.9 percent) in moderate-income tracts. Bank performance was also above the percentage of owner-occupied units (15.2 percent) and aggregate lending (11.7 percent). For 2021, bank performance was excellent. In 2022, the bank originated one HMDA-reportable loan (2.1 percent) in low-income tracts. Bank performance was above both the percentage of owner-occupied units (1.9 percent) and the aggregate lending (0.9 percent). Also, the bank originated eight HMDA-reportable loans (17.0 percent) in moderate-income tracts. This performance was above the percentage of owner-occupied units (14.5 percent) and aggregate lending (10.8 percent). For 2022, bank performance was excellent. Given performance across both years, overall performance is excellent.

Lending to Businesses of Different Sizes and Borrowers of Different Income Levels

The overall distribution of the bank’s HMDA-reportable loans by borrower income and small business loans by business revenues reflects reasonable penetration throughout the bank’s AA. For this analysis, the distribution of small business loans across business revenue sizes and HMDA-reportable loans across borrower income levels was compared to available demographic information. Performance context was also taken into consideration. As previously noted, performance in small business lending carried more weight than performance in HMDA lending.

Small Business Lending

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated by NobleBank & Trust in 2021 and 2022 in the AA. The distribution of the bank’s small business loans reflects reasonable penetration among businesses of different sizes.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Anniston

		Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	33	86.8%	1,384	55.5%	91.4%	15	68.2%	1,627	79.0%	91.5%
	Over \$1 Million	4	10.5%	1,097	44.0%	7.8%	7	31.8%	433	21.0%	7.6%
	Total Rev. available	37	97.4%	2,482	99.5%	99.2%	22	100.0%	2,060	100.0%	99.1%
	Rev. Not Known	1	2.6%	12	0.5%	0.8%	0	0.0%	0	0.0%	0.9%
	Total	38	100%	2,494	100%	100%	22	100%	2,060	100%	100%
Loan Size	\$100,000 or Less	35	92.1%	972	39.0%		17	77.3%	774	37.6%	
	\$100,001 - \$250,000	0	0.0%	0	0.0%		4	18.2%	785	38.1%	
	\$250,001 - \$1 Million	3	7.9%	1,522	61.0%		1	4.5%	501	24.3%	
	Total	38	100%	2,494	100%		22	100%	2,060	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	32	97.0%	913	66.0%		11	73.3%	498	30.6%	
	\$100,001 - \$250,000	0	0.0%	0	0.0%		3	20.0%	628	38.6%	
	\$250,001 - \$1 Million	1	3.0%	472	34.1%		1	6.7%	501	30.8%	
	Total	33	100%	1,384	100%		15	100%	1,627	100%	

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

Of the 38 small business loans originated by the bank in 2021, 33 loans (86.8 percent) were to businesses with annual gross revenues of \$1 million or less, which is below the 91.4 percent of total businesses in the AA considered to be small businesses. However, of those 38 loans made to small businesses, 35 (92.1 percent) were originated to small businesses in amounts of \$250,000 or less. This demonstrates the bank’s willingness to lend to small businesses in smaller loan amounts. Additionally, of the 214 loans made to small businesses in 2021, 167 (78.0 percent) were made as part of the PPP, and all 167 of those were made to small businesses in amounts of \$250,000 or less. In 2021, bank performance in small business lending was reasonable.

Of the 22 small business loans originated by the bank in 2022, 15 loans (68.2 percent) were to businesses with annual gross revenues of \$1 million or less, which is below the 91.5 percent of total businesses in the AA considered to be small businesses. However, of those 22 loans made to small businesses, 21 (95.5 percent) were originated to small businesses in amounts of \$250,000 or less, which demonstrates the bank’s willingness to lend to small businesses in smaller loan amounts. In 2022, bank performance in small business lending was reasonable.

Residential Real Estate (HMDA) Lending

The following tables show the distribution of the bank’s 2021 and 2022 HMDA-reportable loans by the income level of the borrowers within the AA. The table also includes a comparison of the bank’s HMDA-reportable lending to the aggregate HMDA lenders within the AA. As described, the bank’s HMDA-reportable lending by borrower income reflects poor dispersion throughout the bank’s AA.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Anniston

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2021							2022						
		Count			Dollar			Families by Family Income %	Count			Dollar			Families by Family Income %
		Bank #	Agg %	Bank \$ (000s)	Agg %	Bank \$ %	Bank #		Agg %	Bank \$ (000s)	Agg %	Bank \$ %			
HOME PURCHASE	Low	1	2.2%	7.2%	30	0.9%	4.4%	22.9%	0	0.0%	8.2%	0	0.0%	5.1%	20.8%
	Moderate	5	10.9%	25.3%	155	4.7%	20.4%	16.2%	1	5.3%	24.7%	56	2.7%	20.0%	17.4%
	Middle	3	6.5%	23.9%	310	9.4%	24.6%	20.9%	3	15.8%	20.9%	520	25.3%	21.5%	20.3%
	Upper	6	13.0%	22.0%	659	19.9%	29.4%	40.0%	6	31.6%	24.2%	661	32.2%	31.7%	41.5%
	Unknown	31	67.4%	21.6%	2,160	65.2%	21.3%	0.0%	9	47.4%	22.0%	815	39.7%	21.7%	0.0%
	<i>Total</i>	<i>46</i>	<i>100%</i>	<i>100%</i>	<i>3,314</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>19</i>	<i>100%</i>	<i>100%</i>	<i>2,052</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	6.5%	0	0.0%	3.5%	22.9%	2	12.5%	11.2%	67	5.5%	6.1%	20.8%
	Moderate	1	11.1%	14.2%	18	1.9%	10.7%	16.2%	2	12.5%	23.0%	121	9.9%	18.5%	17.4%
	Middle	2	22.2%	22.7%	174	18.6%	20.4%	20.9%	1	6.3%	25.6%	42	3.4%	24.4%	20.3%
	Upper	0	0.0%	30.2%	0	0.0%	37.7%	40.0%	3	18.8%	28.3%	115	9.4%	36.3%	41.5%
	Unknown	6	66.7%	26.4%	745	79.5%	27.6%	0.0%	8	50.0%	11.9%	875	71.7%	14.8%	0.0%
	<i>Total</i>	<i>9</i>	<i>100%</i>	<i>100%</i>	<i>937</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>16</i>	<i>100%</i>	<i>100%</i>	<i>1,220</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	5.5%	0	0.0%	1.7%	22.9%	0	0.0%	15.3%	0	0.0%	11.6%	20.8%
	Moderate	1	25.0%	14.3%	26	12.9%	9.8%	16.2%	1	33.3%	21.4%	36	33.3%	20.8%	17.4%
	Middle	2	50.0%	24.2%	100	49.5%	29.6%	20.9%	2	66.7%	21.4%	72	66.7%	18.9%	20.3%
	Upper	0	0.0%	52.7%	0	0.0%	57.1%	40.0%	0	0.0%	37.8%	0	0.0%	46.6%	41.5%
	Unknown	1	25.0%	3.3%	76	37.6%	1.9%	0.0%	0	0.0%	4.1%	0	0.0%	2.2%	0.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>202</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>108</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.9%	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.2%	0	0.0%	0.0%	0	0.0%	0.0%	17.4%
	Middle	0	0.0%	4.3%	0	0.0%	0.7%	20.9%	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Upper	0	0.0%	4.3%	0	0.0%	0.2%	40.0%	0	0.0%	4.5%	0	0.0%	1.6%	41.5%
	Unknown	5	100.0%	91.3%	2,054	100.0%	99.1%	0.0%	4	100.0%	95.5%	1,437	100.0%	98.4%	0.0%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>2,054</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>1,437</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	11.9%	0	0.0%	6.1%	22.9%	0	0.0%	13.4%	0	0.0%	9.5%	20.8%
	Moderate	0	0.0%	4.8%	0	0.0%	4.1%	16.2%	0	0.0%	17.9%	0	0.0%	11.6%	17.4%
	Middle	0	0.0%	31.0%	0	0.0%	23.7%	20.9%	0	0.0%	25.4%	0	0.0%	20.3%	20.3%
	Upper	0	0.0%	50.0%	0	0.0%	65.4%	40.0%	0	0.0%	37.3%	0	0.0%	55.1%	41.5%
	Unknown	0	0.0%	2.4%	0	0.0%	0.6%	0.0%	0	0.0%	6.0%	0	0.0%	3.5%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Anniston

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data															
		2021							2022								
		Count			Dollar				Families by Family Income	Count			Dollar				Families by Family Income
		Bank #	Agg %	%	Bank \$ (000s)	Agg \$ %	\$ %	Bank #		Agg %	%	Bank \$ (000s)	Agg \$ %	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	23.1%	13	33.3%	13.0%	22.9%	0	0.0%	12.5%	0	0.0%	9.3%	20.8%		
	Moderate	1	50.0%	23.1%	26	66.7%	7.9%	16.2%	1	20.0%	28.1%	29	12.2%	23.3%	17.4%		
	Middle	0	0.0%	19.2%	0	0.0%	15.3%	20.9%	3	60.0%	28.1%	164	68.9%	20.5%	20.3%		
	Upper	0	0.0%	26.9%	0	0.0%	30.5%	40.0%	1	20.0%	25.0%	45	18.9%	44.7%	41.5%		
	Unknown	0	0.0%	7.7%	0	0.0%	33.3%	0.0%	0	0.0%	6.3%	0	0.0%	2.3%	0.0%		
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>39</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>238</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
PURPOSE NOT APPLICABLE	Low	0	0.0%	2.0%	0	0.0%	1.9%	22.9%	0	0.0%	4.3%	0	0.0%	3.8%	20.8%		
	Moderate	0	0.0%	4.0%	0	0.0%	3.0%	16.2%	0	0.0%	4.3%	0	0.0%	5.0%	17.4%		
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.9%	0	0.0%	2.1%	0	0.0%	3.9%	20.3%		
	Upper	0	0.0%	4.0%	0	0.0%	4.8%	40.0%	0	0.0%	0.0%	0	0.0%	0.0%	41.5%		
	Unknown	0	0.0%	90.0%	0	0.0%	90.3%	0.0%	0	0.0%	89.4%	0	0.0%	87.3%	0.0%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
HMDA TOTALS	Low	2	3.0%	6.9%	43	0.7%	3.9%	22.9%	2	4.3%	9.4%	67	1.3%	5.2%	20.8%		
	Moderate	8	12.1%	19.5%	225	3.4%	15.3%	16.2%	5	10.6%	23.4%	242	4.8%	18.5%	17.4%		
	Middle	7	10.6%	23.0%	584	8.9%	21.9%	20.9%	9	19.1%	22.0%	798	15.8%	21.1%	20.3%		
	Upper	6	9.1%	26.4%	659	10.1%	32.3%	40.0%	10	21.3%	25.6%	821	16.2%	31.7%	41.5%		
	Unknown	43	65.2%	24.3%	5,035	76.9%	26.5%	0.0%	21	44.7%	19.6%	3,127	61.9%	23.5%	0.0%		
	<i>Total</i>	<i>66</i>	<i>100%</i>	<i>100%</i>	<i>6,546</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>47</i>	<i>100%</i>	<i>100%</i>	<i>5,055</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

For 2021, the bank originated two (3.0 percent) HMDA-reportable loans to low-income borrowers, which is below the percentage of low-income families in the AA at 22.9 percent, and below aggregate lending at 6.9 percent. As a result, bank performance to low-income borrowers was poor in 2021. Lending to moderate-income borrowers at 12.1 percent was less than the percentage of moderate-income families in the AA at 16.2 percent and below aggregate lending at 19.5 percent. This represents poor performance to moderate-income borrowers in 2021.

The bank originated two (4.3 percent) HMDA-reportable loans to low-income borrowers in 2022, which is below the percentage of low-income families in the AA at 20.8 percent and below aggregate lending at 9.4 percent. As a result, bank performance to low-income borrowers was poor in 2022. Lending to moderate-income borrowers at 10.6 percent was less than the percentage of moderate-income families in the AA at 17.4 percent and below aggregate lending at 23.4 percent. This represents poor performance to moderate-income borrowers in 2022.

COMMUNITY DEVELOPMENT TEST

Considering the bank’s capacity, the level of competition, and the need for and availability of opportunities in the Anniston AA, the bank demonstrates excellent responsiveness to CD needs through a combination loans, qualified investments, donations, and services.

CD activities demonstrated responsiveness to the Anniston AA needs as follows:

- Of the 21 CD loans totaling \$7.6 million, the bank made one loan for \$1.2 million to an organization supporting revitalization and stabilization efforts essential to the emergency infrastructure of Calhoun County, including LMI portions in the Anniston AA.
- Of the 22 investments totaling \$14.1 million, \$3,860,000 benefited the broader statewide or regional area that includes the Anniston, Cleburne – Talladega, and Birmingham AAs. All of these investments are municipal bonds which have a CD purpose, benefiting school boards and universities serving the needs of LMI students. Four of the investments totaling \$1,875,000 support economic development activities for improvements to educational facilities in Calhoun and Cleburne counties in the Anniston and Cleburne-Talladega AAs. Three investments totaling \$1,985,000 support community services for LMI students in Calhoun and Cleburne counties.
- The bank made 24 contributions totaling \$234,045 to CD organizations that benefited the Anniston AA, including \$74,000 in donations to an organization that provides financial assistance to LMI individuals to assist with utilities, rent, transportation, prescriptions, and other needs with the goal of preventing homelessness; \$85,000 in donations to an organization that provides educational and other services to LMI students in the Oxford City school district; \$37,000 in donations to a 501(c)(3) non-profit charitable organization dedicated to assisting homeless and low-income individuals and families in securing safe, decent, affordable shelter; and \$34,500 in donations to a university that provides services to LMI individuals.
- Bank staff contributed 674 hours of CD services serving the Anniston AA, the majority of the services were geared towards fundraising efforts for organizations that benefit LMI individuals and small businesses. Bank staff also provided technical expertise by serving as board or committee members, primarily with organizations engaged in providing community services targeted to LMI individuals and small business owners.

METROPOLITAN AREA – BIRMINGHAM, ALABAMA
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. The limited-scope review revealed the bank's CRA performance in this AA is *Not Consistent* with the AA that received a full-scope review. Refer to the tables in Appendix B for information regarding this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA

The AA has not changed since the previous examination. The Birmingham AA includes parts of Jefferson, St. Clair and Shelby Counties, which are three of six counties that comprise the Birmingham, AL MSA. According to the 2020 US Census, the population of the AA was 988,848 which is a 4.3 percent increase since 2015. In 2022, the AA consisted of 26 low-income tracts, 53 moderate-income tracts, 55 middle-income tracts, 69 upper-income tracts, and seven tracts with unknown incomes. In 2022, 37.9 percent of families were LMI and 9.7 percent of families lived below the poverty level. NobleBank & Trust has a small presence in the Birmingham AA. The bank operates one branch office with an ATM in this AA. According to the FDIC Deposit Market Share Report as of June 30, 2022, there were 41 financial institutions operating 259 branch offices in the AA, and the bank ranked 34th with a deposit market share of 0.1 percent. Regions Bank had the highest deposit market share at 33.2 percent followed by PNC Bank at 17.8 percent and ServisFirst Bank at 10.8 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA

For the Lending Test, NobleBank & Trust received an overall rating of Satisfactory. Performance in the Birmingham AA was consistent with the overall Lending Test rating. The geographic distribution of small business loans and HMDA-reportable loans reflect reasonable dispersion throughout the AA. The distribution of borrowers reflects reasonable penetration to businesses of different revenue sizes and borrowers of different income levels.

For the CD Test, NobleBank received an overall rating of Outstanding. CD Test performance in the Birmingham AA is consistent with the bank's overall performance. The bank made two loans totaling \$5 million to an organization that provides community services to LMI individuals. The primary purpose of the entity is to place vulnerable children into families via adoption and foster care services and provide shelter, food, and essentials for children and families in need. The bank made two contributions totaling \$14,000 to a nonprofit organization that provides services to LMI individuals and supports small businesses, educational entities, workforce development programs, and wellness providers benefiting the Birmingham AA. Bank staff contributed 213 service hours to various CD organizations that benefit LMI individuals, and organizations that benefit small businesses. Bank staff's financial expertise was used to provide financial services and technical expertise by serving as board and committee members to organizations engaged in providing community services targeted to LMI individuals and small business owners.

As previously noted in the Community Development Test under the *Institution* section, the bank also provided CD donations and services that served a BSRA that include one or more of the three counties in the AA. These activities support the consistent conclusion in this AA.

NONMETROPOLITAN AREA – CLEBURNE – TALLADEGA, ALABAMA
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. The limited-scope review revealed the bank's CRA performance in this AA is *Not Consistent* with the AA that received a full-scope review. Please refer to the tables in Appendix B for information regarding this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CLEBURNE – TALLADEGA ASSESSMENT AREA

Description of Assessment Area

This AA is new since the previous examination. The previous Anniston AA included Calhoun County, located in the Anniston - Oxford MSA, and parts of Cleburne and Talladega counties, which are non MSA. For this examination, Cleburne and Talladega counties were joined because they were not substantially beyond the boundary of an MSA. As a result, the two non MSA counties, Cleburne, and Talladega, became the new Cleburne-Talladega AA. In 2019, the bank added tracts in Cleburne County to comprise a full county ahead of the branch opening in Heflin, Alabama, in early 2020. According to the 2020 U.S. Census, the population of the AA was 97,205 which is an 0.8 percent increase since 2015. In 2022, the AA consisted of zero LMI tracts, five middle-income tracts, and three upper-income tracts. In 2022, 27.5 percent of families are LMI, and 7.4 percent of families live below the poverty level. NobleBank & Trust has a small presence in the AA. The bank operates one branch office with an ATM in this AA, which was opened in 2020. According to the FDIC Deposit Market Share Report as of June 30, 2022, there were 10 financial institutions operating 20 branch offices, and the bank ranked 10th with a deposit market share of 1.2 percent. First Bank of Alabama had the highest deposit market share at 59.1 percent followed by Regions Bank at 11.4 percent and Metro Bank at 10.5 percent.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS IN THE CLEBURNE – TALLADEGA ASSESSMENT AREA

For the Lending Test, NobleBank & Trust received an overall rating of Satisfactory. Performance in the Cleburne - Talladega AA was consistent with the overall Lending Test rating. There are no LMI tracts in the AA. The distribution of lending to businesses of different revenue sizes and borrowers of different income levels is reasonable.

For the CD Test, NobleBank received an overall rating of Outstanding. CD Test performance in the Cleburne-Talladega AA is consistent with the bank's overall performance. The bank made one CD loan in the amount of \$1.3 million that funded transportation needs for LMI students in the Cleburne - Talladega AA, which included the purchase of 16 new 72 passenger school buses. The bank made four contributions totaling \$24,000 to a nonprofit organization that provides community services for LMI individuals in the Cleburne – Talladega AA. The bank contributed 159 service hours to various CD organizations that benefit LMI individuals, and organizations that benefit small businesses. Bank staff's financial expertise was used to provide financial services and technical expertise by serving as board and committee members to organizations engaged in providing community services targeted to LMI individuals and small business owners.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
<u>Lending Test</u> : January 1, 2021 through December 31, 2022			
<u>Community Development Test</u> : July 1, 2018 through September 30, 2023			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
NobleBank & Trust, Anniston, Alabama		HMDA-reportable loans and small business loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Anniston (Anniston – Oxford MSA)	Full-scope Review	N/A	N/A
Birmingham (Birmingham MSA)	Limited-scope Review	N/A	N/A
Cleburne - Talladega	Limited-scope Review	N/A	N/A

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES
Combined Demographics Report - 2021

Assessment Area: Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	16.9%	21,614	11.4%	8,559	39.6%	45,586	24.1%
Moderate-income	46	25.1%	40,097	21.2%	8,796	21.9%	28,023	14.8%
Middle-income	42	23.0%	43,699	23.1%	4,359	10.0%	33,007	17.4%
Upper-income	62	33.9%	83,655	44.2%	3,125	3.7%	82,861	43.7%
Unknown-income	2	1.1%	412	0.2%	343	83.3%	0	0.0%
Total Assessment Area	183	100.0%	189,477	100.0%	25,182	13.3%	189,477	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	49,012	14,468	7.6%	29.5%	23,222	47.4%	11,322	23.1%
Moderate-income	82,722	36,106	19.0%	43.6%	31,633	38.2%	14,983	18.1%
Middle-income	75,687	46,250	24.4%	61.1%	21,394	28.3%	8,043	10.6%
Upper-income	129,418	92,943	48.9%	71.8%	27,554	21.3%	8,921	6.9%
Unknown-income	1,585	112	0.1%	7.1%	1,193	75.3%	280	17.7%
Total Assessment Area	338,424	189,879	100.0%	56.1%	104,996	31.0%	43,549	12.9%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,358	8.8%	2,901	8.4%	437	12.5%	20	6.3%
Moderate-income	7,921	20.7%	7,047	20.4%	808	23.1%	66	20.6%
Middle-income	8,589	22.4%	7,766	22.5%	754	21.5%	69	21.6%
Upper-income	17,914	46.7%	16,323	47.3%	1,430	40.9%	161	50.3%
Unknown-income	556	1.5%	482	1.4%	70	2.0%	4	1.3%
Total Assessment Area	38,338	100.0%	34,519	100.0%	3,499	100.0%	320	100.0%
Percentage of Total Businesses:			90.0%		9.1%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	1.5%	3	1.6%	0	0.0%	0	0.0%
Moderate-income	26	13.1%	26	13.6%	0	0.0%	0	0.0%
Middle-income	33	16.7%	32	16.8%	1	14.3%	0	0.0%
Upper-income	135	68.2%	129	67.5%	6	85.7%	0	0.0%
Unknown-income	1	0.5%	1	0.5%	0	0.0%	0	0.0%
Total Assessment Area	198	100.0%	191	100.0%	7	100.0%	0	0.0%
Percentage of Total Farms:			96.5%		3.5%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Combined Demographics Report - 2022

Assessment Area: Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	26	12.4%	14,586	7.7%	4,694	32.2%	40,933	21.7%
Moderate-income	53	25.2%	39,892	21.2%	6,950	17.4%	30,514	16.2%
Middle-income	55	26.2%	53,620	28.5%	3,748	7.0%	33,590	17.8%
Upper-income	69	32.9%	78,197	41.5%	2,182	2.8%	83,286	44.2%
Unknown-income	7	3.3%	2,028	1.1%	714	35.2%	0	0.0%
Total Assessment Area	210	100.0%	188,323	100.0%	18,288	9.7%	188,323	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	38,220	11,107	5.7%	29.1%	17,675	46.2%	9,438	24.7%
Moderate-income	84,221	37,486	19.2%	44.5%	31,909	37.9%	14,826	17.6%
Middle-income	93,908	56,667	29.1%	60.3%	27,724	29.5%	9,517	10.1%
Upper-income	124,565	87,648	45.0%	70.4%	25,575	20.5%	11,342	9.1%
Unknown-income	5,752	1,905	1.0%	33.1%	2,827	49.1%	1,020	17.7%
Total Assessment Area	346,666	194,813	100.0%	56.2%	105,710	30.5%	46,143	13.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,657	9.4%	3,145	8.9%	494	14.5%	18	4.9%
Moderate-income	6,004	15.4%	5,513	15.7%	434	12.8%	57	15.5%
Middle-income	10,151	26.0%	9,147	26.0%	924	27.2%	80	21.8%
Upper-income	18,580	47.7%	16,901	48.0%	1,471	43.3%	208	56.7%
Unknown-income	594	1.5%	514	1.5%	76	2.2%	4	1.1%
Total Assessment Area	38,986	100.0%	35,220	100.0%	3,399	100.0%	367	100.0%
Percentage of Total Businesses:			90.3%		8.7%		0.9%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	2.5%	5	2.6%	0	0.0%	0	0.0%
Moderate-income	14	6.9%	14	7.2%	0	0.0%	0	0.0%
Middle-income	61	30.2%	58	29.7%	3	42.9%	0	0.0%
Upper-income	119	58.9%	115	59.0%	4	57.1%	0	0.0%
Unknown-income	3	1.5%	3	1.5%	0	0.0%	0	0.0%
Total Assessment Area	202	100.0%	195	100.0%	7	100.0%	0	0.0%
Percentage of Total Farms:			96.5%		3.5%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Birmingham

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data													
		2021						2022							
		Count			Dollar			Owner Occupied Units %	Count			Dollar			Owner Occupied Units %
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Bank #		Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %			
HOME PURCHASE	Low	2	10.5%	2.8%	217	7.9%	1.4%	7.6%	1	7.7%	3.3%	48	2.2%	1.5%	5.7%
	Moderate	6	31.6%	13.4%	580	21.2%	7.3%	19.0%	3	23.1%	13.5%	359	16.1%	6.6%	19.2%
	Middle	3	15.8%	23.8%	398	14.6%	18.7%	24.4%	4	30.8%	32.9%	575	25.9%	26.5%	29.1%
	Upper	8	42.1%	60.0%	1,537	56.3%	72.6%	48.9%	5	38.5%	49.9%	1,241	55.8%	65.3%	45.0%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.1%	1.0%
	<i>Total</i>	<i>19</i>	<i>100%</i>	<i>100%</i>	<i>2,732</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>13</i>	<i>100%</i>	<i>100%</i>	<i>2,223</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	1.4%	0	0.0%	0.7%	7.6%	0	0.0%	2.5%	0	0.0%	1.1%	5.7%
	Moderate	2	50.0%	7.6%	298	40.7%	4.2%	19.0%	2	100.0%	13.7%	414	100.0%	7.6%	19.2%
	Middle	0	0.0%	21.7%	0	0.0%	16.1%	24.4%	0	0.0%	31.8%	0	0.0%	24.0%	29.1%
	Upper	2	50.0%	69.2%	434	59.3%	78.9%	48.9%	0	0.0%	51.9%	0	0.0%	67.3%	45.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%	0	0.0%	0.2%	0	0.0%	0.0%	1.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>732</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>414</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	2.9%	0	0.0%	1.3%	7.6%	0	0.0%	1.9%	0	0.0%	1.1%	5.7%
	Moderate	0	0.0%	7.8%	0	0.0%	4.0%	19.0%	0	0.0%	8.6%	0	0.0%	4.8%	19.2%
	Middle	0	0.0%	17.7%	0	0.0%	12.6%	24.4%	0	0.0%	24.7%	0	0.0%	18.1%	29.1%
	Upper	0	0.0%	71.6%	0	0.0%	82.1%	48.9%	0	0.0%	64.5%	0	0.0%	75.8%	45.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.1%	1.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	22.5%	0	0.0%	5.7%	19.8%	1	100.0%	20.4%	232	100.0%	11.7%	14.7%
	Moderate	0	0.0%	32.6%	0	0.0%	25.2%	28.3%	0	0.0%	35.2%	0	0.0%	19.6%	24.1%
	Middle	0	0.0%	26.1%	0	0.0%	54.5%	21.6%	0	0.0%	15.7%	0	0.0%	43.4%	26.6%
	Upper	1	100.0%	18.1%	1,000	100.0%	13.7%	28.1%	0	0.0%	25.0%	0	0.0%	24.7%	32.8%
	Unknown	0	0.0%	0.7%	0	0.0%	0.9%	2.2%	0	0.0%	3.7%	0	0.0%	0.7%	1.9%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>1,000</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>232</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	1.8%	0	0.0%	0.6%	7.6%	0	0.0%	1.0%	0	0.0%	0.5%	5.7%
	Moderate	0	0.0%	6.3%	0	0.0%	3.0%	19.0%	0	0.0%	6.8%	0	0.0%	3.1%	19.2%
	Middle	0	0.0%	15.7%	0	0.0%	11.2%	24.4%	0	0.0%	23.2%	0	0.0%	14.6%	29.1%
	Upper	0	0.0%	76.3%	0	0.0%	85.1%	48.9%	0	0.0%	68.9%	0	0.0%	81.8%	45.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	1.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Birmingham

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data														
		2021							2022							
		Count			Dollar				Owner Occupied Units %	Count			Dollar			Owner Occupied Units %
		Bank #	%	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	Bank #		%	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	4.3%	0	0.0%	1.0%	7.6%	0	0.0%	4.4%	0	0.0%	1.0%	5.7%	
	Moderate	0	0.0%	12.0%	0	0.0%	6.0%	19.0%	0	0.0%	10.4%	0	0.0%	3.4%	19.2%	
	Middle	0	0.0%	19.1%	0	0.0%	13.7%	24.4%	0	0.0%	30.0%	0	0.0%	13.8%	29.1%	
	Upper	0	0.0%	64.5%	0	0.0%	79.3%	48.9%	1	100.0%	55.0%	200	100.0%	81.8%	45.0%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.1%	1.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>200</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	
PURPOSE NOT APPLICABLE	Low	0	0.0%	4.9%	0	0.0%	2.4%	7.6%	0	0.0%	2.8%	0	0.0%	0.5%	5.7%	
	Moderate	0	0.0%	29.9%	0	0.0%	21.8%	19.0%	0	0.0%	37.3%	0	0.0%	11.8%	19.2%	
	Middle	0	0.0%	33.8%	0	0.0%	32.9%	24.4%	0	0.0%	35.5%	0	0.0%	18.3%	29.1%	
	Upper	0	0.0%	31.3%	0	0.0%	42.9%	48.9%	0	0.0%	24.0%	0	0.0%	69.3%	45.0%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%	0	0.0%	0.5%	0	0.0%	0.1%	1.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	
HMDA TOTALS	Low	2	8.3%	2.2%	217	4.9%	1.4%	7.6%	2	11.8%	2.9%	280	9.1%	2.3%	5.7%	
	Moderate	8	33.3%	10.3%	878	19.7%	7.3%	19.0%	5	29.4%	12.9%	773	25.2%	7.8%	19.2%	
	Middle	3	12.5%	22.4%	398	8.9%	20.3%	24.4%	4	23.5%	31.1%	575	18.7%	26.6%	29.1%	
	Upper	11	45.8%	65.1%	2,971	66.6%	70.8%	48.9%	6	35.3%	52.8%	1,441	47.0%	63.2%	45.0%	
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.1%	0	0.0%	0.2%	0	0.0%	0.1%	1.0%	
	<i>Total</i>	<i>24</i>	<i>100%</i>	<i>100%</i>	<i>4,464</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>17</i>	<i>100%</i>	<i>100%</i>	<i>3,069</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Geographic Distribution of Small Business Loans
Assessment Area: Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	8.8%	0	0.0%	0	0.0%	9.4%
	Moderate	1	5.9%	321	12.3%	20.7%	2	14.3%	255	5.4%	15.4%
	Middle	5	29.4%	1,337	51.1%	22.4%	5	35.7%	1,791	38.3%	26.0%
	Upper	11	64.7%	961	36.7%	46.7%	7	50.0%	2,634	56.3%	47.7%
	Unknown	0	0.0%	0	0.0%	1.5%	0	0.0%	0	0.0%	1.5%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0	0.0%	
	<i>Total</i>	<i>17</i>	<i>100%</i>	<i>2,619</i>	<i>100%</i>	<i>100%</i>	<i>14</i>	<i>100%</i>	<i>4,680</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2021						2022							
		Count			Dollar			Families by Family Income %	Count			Dollar			Families by Family Income %
		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	
HOME PURCHASE	Low	0	0.0%	5.5%	0	0.0%	2.6%	24.1%	0	0.0%	6.8%	0	0.0%	2.9%	21.7%
	Moderate	1	5.3%	18.8%	75	2.7%	12.7%	14.8%	0	0.0%	19.1%	0	0.0%	12.5%	16.2%
	Middle	0	0.0%	20.0%	0	0.0%	17.7%	17.4%	0	0.0%	19.2%	0	0.0%	16.9%	17.8%
	Upper	5	26.3%	40.4%	891	32.6%	52.8%	43.7%	2	15.4%	40.0%	591	26.6%	53.7%	44.2%
	Unknown	13	68.4%	15.3%	1,766	64.6%	14.1%	0.0%	11	84.6%	14.9%	1,632	73.4%	14.1%	0.0%
	<i>Total</i>	<i>19</i>	<i>100%</i>	<i>100%</i>	<i>2,732</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>13</i>	<i>100%</i>	<i>100%</i>	<i>2,223</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	4.8%	0	0.0%	2.2%	24.1%	0	0.0%	10.0%	0	0.0%	4.9%	21.7%
	Moderate	0	0.0%	12.4%	0	0.0%	7.9%	14.8%	0	0.0%	19.1%	0	0.0%	12.9%	16.2%
	Middle	0	0.0%	18.6%	0	0.0%	14.9%	17.4%	0	0.0%	21.2%	0	0.0%	18.4%	17.8%
	Upper	0	0.0%	44.1%	0	0.0%	55.6%	43.7%	0	0.0%	36.7%	0	0.0%	50.3%	44.2%
	Unknown	4	100.0%	20.2%	732	100.0%	19.3%	0.0%	2	100.0%	12.9%	414	100.0%	13.4%	0.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>732</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>414</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	6.2%	0	0.0%	2.9%	24.1%	0	0.0%	7.2%	0	0.0%	3.3%	21.7%
	Moderate	0	0.0%	11.6%	0	0.0%	7.6%	14.8%	0	0.0%	12.9%	0	0.0%	7.8%	16.2%
	Middle	0	0.0%	17.9%	0	0.0%	12.9%	17.4%	0	0.0%	19.6%	0	0.0%	14.8%	17.8%
	Upper	0	0.0%	61.4%	0	0.0%	73.6%	43.7%	0	0.0%	56.5%	0	0.0%	69.3%	44.2%
	Unknown	0	0.0%	2.8%	0	0.0%	2.9%	0.0%	0	0.0%	3.8%	0	0.0%	4.7%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	24.1%	0	0.0%	0.0%	0	0.0%	0.0%	21.7%
	Moderate	0	0.0%	0.7%	0	0.0%	0.0%	14.8%	0	0.0%	0.0%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	17.8%
	Upper	0	0.0%	2.2%	0	0.0%	0.1%	43.7%	0	0.0%	2.8%	0	0.0%	0.3%	44.2%
	Unknown	1	100.0%	97.1%	1,000	100.0%	99.8%	0.0%	1	100.0%	97.2%	232	100.0%	99.7%	0.0%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>1,000</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>232</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	4.2%	0	0.0%	1.6%	24.1%	0	0.0%	4.7%	0	0.0%	2.1%	21.7%
	Moderate	0	0.0%	8.8%	0	0.0%	4.4%	14.8%	0	0.0%	11.4%	0	0.0%	6.0%	16.2%
	Middle	0	0.0%	14.6%	0	0.0%	10.0%	17.4%	0	0.0%	18.6%	0	0.0%	11.5%	17.8%
	Upper	0	0.0%	70.0%	0	0.0%	82.1%	43.7%	0	0.0%	60.8%	0	0.0%	76.2%	44.2%
	Unknown	0	0.0%	2.4%	0	0.0%	1.9%	0.0%	0	0.0%	4.5%	0	0.0%	4.1%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2021							2022						
		Count			Dollar			Families by Family Income	Count			Dollar			Families by Family Income
		Bank	Agg		Bank	Agg			Bank	Agg		Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	8.0%	0	0.0%	2.9%	24.1%	0	0.0%	6.5%	0	0.0%	1.7%	21.7%
	Moderate	0	0.0%	17.7%	0	0.0%	8.6%	14.8%	0	0.0%	13.1%	0	0.0%	4.4%	16.2%
	Middle	0	0.0%	11.0%	0	0.0%	6.6%	17.4%	0	0.0%	16.9%	0	0.0%	9.6%	17.8%
	Upper	0	0.0%	54.8%	0	0.0%	73.6%	43.7%	1	100.0%	53.4%	200	100.0%	75.7%	44.2%
	Unknown	0	0.0%	8.4%	0	0.0%	8.4%	0.0%	0	0.0%	10.1%	0	0.0%	8.6%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>200</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	3.0%	0	0.0%	1.6%	24.1%	0	0.0%	1.4%	0	0.0%	0.4%	21.7%
	Moderate	0	0.0%	1.4%	0	0.0%	1.6%	14.8%	0	0.0%	4.1%	0	0.0%	2.6%	16.2%
	Middle	0	0.0%	0.5%	0	0.0%	0.4%	17.4%	0	0.0%	1.4%	0	0.0%	1.2%	17.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.7%	0	0.0%	0.0%	0	0.0%	0.0%	44.2%
	Unknown	0	0.0%	95.1%	0	0.0%	96.4%	0.0%	0	0.0%	93.1%	0	0.0%	95.8%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>
HMDA TOTALS	Low	0	0.0%	5.1%	0	0.0%	2.2%	24.1%	0	0.0%	7.5%	0	0.0%	3.1%	21.7%
	Moderate	1	4.2%	14.8%	75	1.7%	9.3%	14.8%	0	0.0%	17.7%	0	0.0%	11.0%	16.2%
	Middle	0	0.0%	18.8%	0	0.0%	14.7%	17.4%	0	0.0%	19.5%	0	0.0%	15.4%	17.8%
	Upper	5	20.8%	43.3%	891	20.0%	50.3%	43.7%	3	17.6%	41.7%	791	25.8%	49.3%	44.2%
	Unknown	18	75.0%	18.0%	3,498	78.4%	23.5%	0.0%	14	82.4%	13.7%	2,278	74.2%	21.3%	0.0%
	<i>Total</i>	<i>24</i>	<i>100%</i>	<i>100%</i>	<i>4,464</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>17</i>	<i>100%</i>	<i>100%</i>	<i>3,069</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Birmingham

		Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%		
Revenue	\$1 Million or Less	10	58.8%	561	21.4%	90.0%	6	42.9%	2,142	45.8%	90.3%
	Over \$1 Million	7	41.2%	2,057	78.5%	9.1%	8	57.1%	2,538	54.2%	8.7%
	<i>Total Rev. available</i>	17	100.0%	2,619	100.0%	99.2%	14	100.0%	4,680	100.0%	99.1%
	Rev. Not Known	0	0.0%	0	0.0%	0.8%	0	0.0%	0	0.0%	0.9%
	<i>Total</i>	17	100%	2,619	100%	100%	14	100%	4,680	100%	100%
Loan Size	\$100,000 or Less	10	58.8%	402	15.3%		3	21.4%	137	2.9%	
	\$100,001 - \$250,000	4	23.5%	667	25.5%		5	35.7%	850	18.2%	
	\$250,001 - \$1 Million	3	17.6%	1,549	59.1%		6	42.9%	3,693	78.9%	
	<i>Total</i>	17	100%	2,619	100%		14	100%	4,680	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	90.0%	326	58.1%		0	0.0%	0	0.0%	
	\$100,001 - \$250,000	1	10.0%	235	41.9%		4	66.7%	702	32.8%	
	\$250,001 - \$1 Million	0	0.0%	0	0.0%		2	33.3%	1,440	67.2%	
	<i>Total</i>	10	100%	561	100%		6	100%	2,142	100%	

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Combined Demographics Report - 2021

Assessment Area: Cleburne-Talladega

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	1,273	14.3%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	1,524	17.1%
Middle-income	5	62.5%	5,325	59.6%	610	11.5%	1,784	20.0%
Upper-income	3	37.5%	3,605	40.4%	355	9.8%	4,349	48.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	8	100.0%	8,930	100.0%	965	10.8%	8,930	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Middle-income	8,726	5,843	59.5%	67.0%	1,838	21.1%	1,045	12.0%
Upper-income	6,099	3,985	40.5%	65.3%	942	15.4%	1,172	19.2%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	14,825	9,828	100.0%	66.3%	2,780	18.8%	2,217	15.0%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	543	63.1%	492	62.9%	31	58.5%	20	80.0%
Upper-income	317	36.9%	290	37.1%	22	41.5%	5	20.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	860	100.0%	782	100.0%	53	100.0%	25	100.0%
Percentage of Total Businesses:			90.9%		6.2%		2.9%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	45	90.0%	45	90.0%	0	0.0%	0	0.0%
Upper-income	5	10.0%	5	10.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	50	100.0%	50	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:			100.0%		0.0%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Combined Demographics Report - 2022

Assessment Area: Cleburne-Talladega

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	1,279	14.4%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	1,165	13.1%
Middle-income	5	62.5%	5,201	58.4%	555	10.7%	2,082	23.4%
Upper-income	3	37.5%	3,706	41.6%	106	2.9%	4,381	49.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	8	100.0%	8,907	100.0%	661	7.4%	8,907	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Middle-income	9,253	5,902	57.1%	63.8%	1,656	17.9%	1,695	18.3%
Upper-income	6,007	4,428	42.9%	73.7%	747	12.4%	832	13.9%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15,260	10,330	100.0%	67.7%	2,403	15.7%	2,527	16.6%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	594	67.6%	539	67.2%	38	73.1%	17	68.0%
Upper-income	285	32.4%	263	32.8%	14	26.9%	8	32.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	879	100.0%	802	100.0%	52	100.0%	25	100.0%
	Percentage of Total Businesses:		91.2%		5.9%		2.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	19	38.8%	19	38.8%	0	0.0%	0	0.0%
Upper-income	30	61.2%	30	61.2%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	49	100.0%	49	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:		100.0%		0.0%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Cleburne-Talladega

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data													
		2021						2022							
		Count			Dollar			Owner Occupied Units %	Count			Dollar			Owner Occupied Units %
		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	
HOME PURCHASE	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%
	Moderate	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	4	80.0%	37.0%	193	53.9%	33.0%	59.5%	1	50.0%	45.7%	29	16.2%	41.5%	57.1%
	Upper	1	20.0%	63.0%	165	46.1%	67.0%	40.5%	1	50.0%	54.3%	150	83.8%	58.5%	42.9%
	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%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>358</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>179</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
REFINANCE	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%
	Moderate	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	5	100.0%	39.2%	865	100.0%	36.6%	59.5%	4	80.0%	50.7%	391	76.5%	54.1%	57.1%
	Upper	0	0.0%	60.8%	0	0.0%	63.4%	40.5%	1	20.0%	49.3%	120	23.5%	45.9%	42.9%
	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%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>865</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>511</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
HOME IMPROVEMENT	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%
	Moderate	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%	57.1%	30	100.0%	63.0%	59.5%	1	100.0%	61.3%	55	100.0%	34.4%	57.1%
	Upper	0	0.0%	42.9%	0	0.0%	37.0%	40.5%	0	0.0%	38.7%	0	0.0%	65.6%	42.9%
	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%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>30</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>55</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>
MULTI FAMILY	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%
	Moderate	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	0.0%	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%	94.2%
	Upper	0	0.0%	100.0%	0	0.0%	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	5.8%
	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>
OTHER PURPOSE LOC	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%
	Moderate	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%	53.8%	0	0.0%	59.5%	59.5%	0	0.0%	36.0%	0	0.0%	55.2%	57.1%
	Upper	0	0.0%	46.2%	0	0.0%	40.5%	40.5%	0	0.0%	64.0%	0	0.0%	44.8%	42.9%
	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Cleburne-Talladega

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data														
		2021							2022							
		Count			Dollar				Owner Occupied Units %	Count			Dollar			Owner Occupied Units %
		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	Bank #		Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %		
OTHER PURPOSE CLOSED/EXEMPT	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%	
	Moderate	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%	84.6%	0	0.0%	62.3%	59.5%	0	0.0%	66.7%	0	0.0%	79.0%	57.1%	
	Upper	0	0.0%	15.4%	0	0.0%	37.7%	40.5%	0	0.0%	33.3%	0	0.0%	21.0%	42.9%	
	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	
PURPOSE NOT APPLICABLE	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%	
	Moderate	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%	37.5%	0	0.0%	28.1%	59.5%	0	0.0%	0.0%	0	0.0%	0.0%	57.1%	
	Upper	0	0.0%	62.5%	0	0.0%	71.9%	40.5%	0	0.0%	100.0%	0	0.0%	100.0%	42.9%	
	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	
HMDA TOTALS	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%	
	Moderate	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	10	90.9%	39.0%	1,088	86.8%	35.1%	59.5%	6	75.0%	47.5%	475	63.8%	44.8%	57.1%	
	Upper	1	9.1%	61.0%	165	13.2%	64.9%	40.5%	2	25.0%	52.5%	270	36.2%	55.2%	42.9%	
	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%	
	<i>Total</i>	<i>11</i>	<i>100%</i>	<i>100%</i>	<i>1,253</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>8</i>	<i>100%</i>	<i>100%</i>	<i>745</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Geographic Distribution of Small Business Loans

Assessment Area: Cleburne-Talladega

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.0%
	Middle	13	100.0%	716	100.0%	63.1%	15	78.9%	2,260	77.6%	67.6%
	Upper	0	0.0%	0	0.0%	36.9%	4	21.1%	652	22.4%	32.4%
	Unknown	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%	
	<i>Total</i>	<i>13</i>	<i>100%</i>	<i>716</i>	<i>100%</i>	<i>100%</i>	<i>19</i>	<i>100%</i>	<i>2,912</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Cleburne-Talladega

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data															
		2021							2022								
		Count			Dollar				Families by Family Income %	Count			Dollar				Families by Family Income %
		Bank #	Agg %	Bank %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Bank #		Agg %	Bank %	Bank \$ (000s)	Agg \$ %	Bank \$ %			
HOME PURCHASE	Low	0	0.0%	2.3%	0	0.0%	1.4%	14.3%	0	0.0%	2.7%	0	0.0%	1.2%	14.4%		
	Moderate	3	60.0%	15.3%	126	35.2%	10.8%	17.1%	0	0.0%	18.1%	0	0.0%	12.7%	13.1%		
	Middle	0	0.0%	22.6%	0	0.0%	20.4%	20.0%	0	0.0%	25.6%	0	0.0%	22.4%	23.4%		
	Upper	2	40.0%	36.4%	232	64.8%	43.3%	48.7%	2	100.0%	34.5%	179	100.0%	44.6%	49.2%		
	Unknown	0	0.0%	23.4%	0	0.0%	24.1%	0.0%	0	0.0%	19.1%	0	0.0%	19.0%	0.0%		
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>358</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>179</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
REFINANCE	Low	0	0.0%	2.0%	0	0.0%	0.8%	14.3%	0	0.0%	5.7%	0	0.0%	2.3%	14.4%		
	Moderate	1	20.0%	7.3%	81	9.4%	4.0%	17.1%	0	0.0%	12.8%	0	0.0%	9.9%	13.1%		
	Middle	0	0.0%	19.3%	0	0.0%	14.4%	20.0%	1	20.0%	26.2%	120	23.5%	20.6%	23.4%		
	Upper	3	60.0%	44.3%	299	34.6%	49.6%	48.7%	4	80.0%	42.9%	391	76.5%	52.3%	49.2%		
	Unknown	1	20.0%	27.0%	485	56.1%	31.1%	0.0%	0	0.0%	12.4%	0	0.0%	14.8%	0.0%		
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>865</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>100%</i>	<i>511</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
HOME IMPROVEMENT	Low	0	0.0%	14.3%	0	0.0%	14.9%	14.3%	0	0.0%	9.7%	0	0.0%	5.8%	14.4%		
	Moderate	0	0.0%	7.1%	0	0.0%	3.6%	17.1%	0	0.0%	9.7%	0	0.0%	3.7%	13.1%		
	Middle	0	0.0%	17.9%	0	0.0%	19.8%	20.0%	0	0.0%	29.0%	0	0.0%	14.7%	23.4%		
	Upper	0	0.0%	57.1%	0	0.0%	60.3%	48.7%	1	100.0%	45.2%	55	100.0%	33.1%	49.2%		
	Unknown	1	100.0%	3.6%	30	100.0%	1.4%	0.0%	0	0.0%	6.5%	0	0.0%	42.7%	0.0%		
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>30</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>55</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	14.3%	0	0.0%	0.0%	0	0.0%	0.0%	14.4%		
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%	0	0.0%	0.0%	0	0.0%	0.0%	13.1%		
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.0%	0	0.0%	0.0%	0	0.0%	0.0%	23.4%		
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	48.7%	0	0.0%	0.0%	0	0.0%	0.0%	49.2%		
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0.0%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
OTHER PURPOSE LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	14.3%	0	0.0%	8.0%	0	0.0%	2.6%	14.4%		
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%	0	0.0%	4.0%	0	0.0%	2.5%	13.1%		
	Middle	0	0.0%	23.1%	0	0.0%	21.3%	20.0%	0	0.0%	20.0%	0	0.0%	14.9%	23.4%		
	Upper	0	0.0%	76.9%	0	0.0%	78.7%	48.7%	0	0.0%	68.0%	0	0.0%	80.0%	49.2%		
	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%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Cleburne-Talladega

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data															
		2021							2022								
		Count			Dollar				Families by Family Income	Count			Dollar				Families by Family Income
		Bank	Agg	Agg	Bank	Agg	Agg	Bank		Agg	Agg	Bank	Agg	Agg			
#	%	%	\$ (000s)	\$ %	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	%				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	15.4%	0	0.0%	2.4%	14.3%	0	0.0%	0.0%	0	0.0%	0.0%	14.4%		
	Moderate	0	0.0%	23.1%	0	0.0%	20.3%	17.1%	0	0.0%	6.7%	0	0.0%	9.6%	13.1%		
	Middle	0	0.0%	7.7%	0	0.0%	2.2%	20.0%	0	0.0%	33.3%	0	0.0%	32.3%	23.4%		
	Upper	0	0.0%	53.8%	0	0.0%	75.1%	48.7%	0	0.0%	60.0%	0	0.0%	58.1%	49.2%		
	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%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	14.3%	0	0.0%	0.0%	0	0.0%	0.0%	14.4%		
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%	0	0.0%	0.0%	0	0.0%	0.0%	13.1%		
	Middle	0	0.0%	25.0%	0	0.0%	26.2%	20.0%	0	0.0%	33.3%	0	0.0%	20.0%	23.4%		
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	48.7%	0	0.0%	0.0%	0	0.0%	0.0%	49.2%		
	Unknown	0	0.0%	75.0%	0	0.0%	73.8%	0.0%	0	0.0%	66.7%	0	0.0%	80.0%	0.0%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
HMDA TOTALS	Low	0	0.0%	2.5%	0	0.0%	1.2%	14.3%	0	0.0%	3.9%	0	0.0%	1.6%	14.4%		
	Moderate	4	36.4%	11.4%	207	16.5%	7.6%	17.1%	0	0.0%	15.7%	0	0.0%	11.6%	13.1%		
	Middle	0	0.0%	20.9%	0	0.0%	17.6%	20.0%	1	12.5%	25.9%	120	16.1%	21.7%	23.4%		
	Upper	5	45.5%	40.7%	531	42.4%	46.4%	48.7%	7	87.5%	38.3%	625	83.9%	46.6%	49.2%		
	Unknown	2	18.2%	24.5%	515	41.1%	27.3%	0.0%	0	0.0%	16.3%	0	0.0%	18.5%	0.0%		
	<i>Total</i>	<i>11</i>	<i>100%</i>	<i>100%</i>	<i>1,253</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>8</i>	<i>100%</i>	<i>100%</i>	<i>745</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX B – LIMITED SCOPE AA DEMOGRAPHIC AND LENDING TABLES (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Cleburne-Talladega

		Bank Lending & Demographic Data									
		2021					2022				
		Count		Dollar		Total Businesses	Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	12	92.3%	595	83.1%	90.9%	15	78.9%	940	32.3%	91.2%
	Over \$1 Million	1	7.7%	120	16.8%	6.2%	4	21.1%	1,972	67.7%	5.9%
	<i>Total Rev. available</i>	13	100.0%	716	100.0%	97.1%	19	100.0%	2,912	100.0%	97.2%
	Rev. Not Known	0	0.0%	0	0.0%	2.9%	0	0.0%	0	0.0%	2.8%
	<i>Total</i>	13	100%	716	100%	100%	19	100%	2,912	100%	100%
Loan Size	\$100,000 or Less	10	76.9%	330	46.1%		11	57.9%	431	14.8%	
	\$100,001 - \$250,000	3	23.1%	385	53.8%		5	26.3%	741	25.4%	
	\$250,001 - \$1 Million	0	0.0%	0	0.0%		3	15.8%	1,740	59.8%	
	<i>Total</i>	13	100%	716	100%		19	100%	2,912	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	10	83.3%	330	55.5%		11	73.3%	431	45.9%	
	\$100,001 - \$250,000	2	16.7%	265	44.5%		4	26.7%	509	54.1%	
	\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%	0	0.0%	
	<i>Total</i>	12	100%	595	100%		15	100%	940	100%	

Originations & Purchases

Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2022 FFIEC Census Data; 2016-2020 ACS data; 2021 & 2022 D&B information

APPENDIX C – 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 NobleBank & Trust prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **March 25, 2024**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX D – GLOSSARY

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

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

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

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

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

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

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

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

APPENDIX D – GLOSSARY (Continued)

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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.

APPENDIX D – GLOSSARY (Continued)

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.