



PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust
Charter Number 10697

111 South Main Street
Atmore, AL 36504

Office of the Comptroller of the Currency

3595 Grandview Parkway, Suite 655
Birmingham, AL 35243

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

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 2
Discriminatory or Other Illegal Credit Practices Review..... 3
Lending Test 6
State Rating..... 4
 State of Alabama..... 4
Appendix A: Scope of Examination..... Appendix A-1
Appendix B: Summary of MMSA and State Ratings..... Appendix B-1
Appendix C: Definitions and Common Abbreviations..... Appendix C-1
Appendix D: Tables of Performance Data..... Appendix D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the First National Bank and Trust's (FNB&T, bank) reasonable loan-to-deposit (LTD) ratio, substantial majority of lending occurring inside the assessment areas (AAs), a reasonable geographic distribution of loans, and a reasonable distribution of loans to borrowers of different income levels and businesses of different sizes.
- The bank did not receive any Community Reinvestment Act (CRA) complaints during the review period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

The bank's quarterly average LTD ratio for the twelve consecutive quarters between January 1, 2020, and December 31, 2022, was 64.5 percent, with a quarterly high ratio of 73.4 percent and a quarterly low ratio of 55.5 percent. We compared the bank's LTD ratio to seven other banks located in the area. The quarterly average LTD ratio for banks in this peer group was 53.7 percent for the same period, ranging from 37.9 percent to 81.8 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 72.0 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	135	67.2	66	32.8	201	16,570	54.3	13,964	45.7	30,534
Small Business	151	77.0	45	22.9	196	28,683	72.2	11,058	27.8	39,741
Total	286	72.0	111	27.9	397	45,253	64.4	25,022	35.6	70,275

Source: 01/01/2020-12/31/2022 Bank Data; Due to rounding, totals may not equal 100.0%.

Description of Institution

FNB&T is a nationally chartered bank, established in 1915, and headquartered in Atmore, Alabama. The bank is wholly owned by First Suncoast Trust Bancshares, Inc., a one-bank holding company. The bank is a single-state institution, with four office locations and five automated teller machines (ATMs) in Atmore, Excel, and Mobile, Alabama. FNB&T is a Community Development Financial Institution (CDFI) and offers traditional loan and deposit products and services, in addition to online banking, online bill-pay, mobile deposit services, and instant issue debit cards.

FNB&T has two AAs, the entirety of Monroe and Escambia counties, which combine to form the non-metropolitan statistical area (MSA) Monroe/Escambia County AA, and Mobile County, which is part of the Mobile, AL MSA, and referred to as the Mobile, AL MSA AA. Both AAs meet regulatory requirements and do not reflect illegal discrimination, or arbitrarily exclude low- or moderate-income (LMI) areas. There have been no changes to the bank's AAs since the prior CRA exam report dated September 9, 2020, which rated the bank's overall CRA performance as Satisfactory. There are no legal or financial constraints that prohibit the bank from meeting the credit needs of its AAs, and there have been no public comments or complaints regarding the bank's CRA performance.

As of December 31, 2022, the bank reported total assets of \$208.6 million and a leverage capital ratio of 10.9 percent. The loan portfolio totaled \$129.8 million, representing 62.2 percent of total assets. The bank's primary loan products were home mortgage and small business loans.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted review of the bank's CRA performance using Small Bank performance criteria, which includes a Lending Test. Our evaluation period was January 1, 2020, through December 31, 2022. To evaluate lending performance, we reviewed home mortgage and small business loans, the bank's primary loan products. As the bank was not a Home Mortgage Disclosure Act (HMDA) reporter within our evaluation period, we based our lending analysis on a sample of home mortgage loans.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on its performance in all AAs. We placed equal weight on lending performance with home mortgage loans and small business loans. Refer to the "Scope" section under the State of Alabama Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Alabama

CRA rating for the State of Alabama¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of loans in the state.
- The bank exhibited reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank did not receive any CRA-related complaints during our evaluation period.

Description of Institution's Operations in Alabama

FNB&T operates only in Alabama. The information provided in the "Description of Institution" section of this Performance Evaluation describes the institution's operations in Alabama.

FNB&T has four branch locations. Two branches are in Escambia County, and one is in Monroe County, for a total of three locations in the Monroe/Escambia County AA. In 2022, the bank held a 7.9 percent deposit market share in this AA. The bank has one branch in Mobile County, in the Mobile, AL MSA AA, and in 2022, held 0.2 percent deposit market share in the AA. Competition from large and regional banks is high in both AAs.

We obtained community contacts from area nonprofit agencies to better understand local community needs. The contacts indicated a need for multifamily mixed-income housing, with opportunities for housing rehabilitation and new construction. The contacts also noted a need for small business loans, particularly for working capital, lines of credit, and real estate/equipment acquisition. Another contact described community needs that included financial literacy programs, as well as services, such as childcare for LMI families, which would help expand workforce development. We received a letter of support from the Alabama Multifamily Loan Consortium, Inc. (AMLC) stating that FNB&T is a supportive member, funding participation interests in AMLC loans. AMLC is a collaboration between the Alabama Housing Finance Authority and the Alabama Bankers Association, to provide a permanent funding source for Low Income Housing Tax Credit (LIHTC) loans.

The following tables provide demographic summary information for the Monroe/Escambia County AA.

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

Monroe/Escambia County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Monroe/Escambia County AA – 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	31.3	56.3	12.5	0.0
Population by Geography	60,152	0.0	20.3	66.0	13.7	0.0
Housing Units by Geography	27,731	0.0	22.9	63.3	13.8	0.0
Owner-Occupied Units by Geography	15,335	0.0	19.3	65.7	15.0	0.0
Occupied Rental Units by Geography	6,730	0.0	24.4	61.3	14.3	0.0
Vacant Units by Geography	5,666	0.0	30.8	59.1	10.0	0.0
Businesses by Geography	3,012	0.0	27.4	51.1	21.5	0.0
Farms by Geography	151	0.0	16.6	70.2	13.2	0.0
Family Distribution by Income Level	14,529	27.6	17.7	18.7	36.0	0.0
Household Distribution by Income Level	22,065	31.6	15.0	15.4	38.0	0.0
Median Family Income MSA – Non-MSAs – AL		\$45,454	Median Housing Value			\$89,426
			Median Gross Rent			\$564
			Families Below Poverty Level			21.8%

*Source: 2015 ACS Census and 2021 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						
Assessment Area: Monroe/Escambia County AA - 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	15.8	73.7	0.0	5.3
Population by Geography	56,529	6.6	15.7	76.1	0.0	1.6
Housing Units by Geography	28,069	7.0	16.0	74.1	0.0	2.9
Owner-Occupied Units by Geography	14,056	5.4	17.1	75.4	0.0	2.1
Occupied Rental Units by Geography	6,925	10.8	13.9	73.5	0.0	1.8
Vacant Units by Geography	7,088	6.6	16.0	72.0	0.0	5.5
Businesses by Geography	4,032	7.3	18.5	72.5	0.0	1.7
Farms by Geography	197	4.6	14.7	78.7	0.0	2.0
Family Distribution by Income Level	12,698	26.6	18.4	19.8	35.3	0.0
Household Distribution by Income Level	20,981	32.1	17.1	15.4	35.4	0.0
Median Family Income MSA – Non-MSAs – AL		\$55,960	Median Housing Value			\$103,769
			Median Gross Rent			\$566
			Families Below Poverty Level			17.6%

Source: 2020 ACS Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Alabama

We selected the non-MSA Monroe/Escambia County AA for the full-scope evaluation. The Mobile, AL MSA AA received a limited-scope review. FNB&T opened the Mobile, AL branch in September 2019, and while we saw increases in lending and deposit operations over our evaluation period, the total volume did not support a meaningful analysis.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Monroe/Escambia County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

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

In 2020-2021, 15.0 percent of the bank's home mortgage loans were made in moderate-income CTs, which exceeds the peer aggregate level (12.8 percent), but is slightly lower than the percentage of owner-occupied housing units in the AA (19.3 percent). There were no low-income CTs in the AA for these years.

In 2022, 15.0 percent of the bank's home mortgage loans were made in low-income CTs, which significantly exceeds aggregate peer lending levels (2.4 percent) and the percentage of owner-occupied housing units (5.4 percent). The bank originated 20.0 percent of home mortgage loans in moderate-income CTs, which is in-line with peer aggregate lending levels (23.3 percent) and exceeds the percentage of owner-occupied housing units (17.1 percent).

Small Loans to Businesses

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

In 2020-2021, the bank originated 20.0 percent of loans to small businesses in moderate-income CTs, which is below the peer aggregate level (28.9 percent) and the percentage of businesses (27.4 percent). There were no low-income census tracts in the AA for these years.

In 2022, the bank originated no small business loans in low-income CTs although peer aggregate lending levels totaled 7.1 percent and the percentage of businesses totaled 7.3 percent. The bank originated 5.0 percent of small business loans in moderate-income CTs, which was below peer aggregate levels (19.4 percent) and the percentage of businesses (18.5 percent). The bank originated 10.0 percent of loans in CTs where income was not available.

Bank management stated the high level of competition from other financial institutions, as well as the smaller percentage of businesses located within the LMI CTs contributed to the bank's performance. The majority of businesses are located in the middle-income CTs in this AA, which are designated as distressed or underserved CTs.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

In 2020-2021, the bank originated 12.5 percent of loans to low-income borrowers, which significantly exceeded the peer aggregate level (4.1 percent) but was below the percentage of low-income families (27.6 percent). The bank originated 20.0 percent of loans to moderate-income borrowers, which exceeded both the peer aggregate level (13.9 percent) and the percentage of moderate-income families (17.7 percent).

In 2022, the bank originated 15.0 percent of loans to low-income borrowers, which is significantly higher than the peer aggregate level (7.8 percent), but below the percentage of low-income families in the AA (26.6 percent). The bank originated 10.0 percent of loans to moderate-income borrowers, which was below both the peer aggregate level (20.0 percent) and the percentage of moderate-income families (18.4 percent).

Small Loans to Businesses

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

In 2020-2021, the bank originated 75.0 percent of loans to businesses with gross revenues equal to or less than \$1 million, which significantly exceeded the peer aggregate level (40.6 percent) and was in-line with the percentage of businesses (76.2 percent).

In 2022, the bank originated 65.0 percent of loans to businesses with gross revenues equal to or less than \$1 million, which significantly exceeded the peer aggregate level (47.2 percent) but was below the percentage of businesses (82.0 percent).

Responses to Complaints

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

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Mobile, AL MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage, small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Alabama	Full-Scope	Monroe/Escambia County AA
Alabama	Limited-Scope	Mobile, AL MSA AA

Appendix B: Summary of MMSA and State Ratings

RATINGS	First National Bank and Trust, 10697
Overall Bank:	Lending Test Rating
First National Bank and Trust	Satisfactory
State:	
Alabama	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Monroe/ Escambia County AA	40	3,365	100.0	1,139	0.0	0.0	0.0	19.3	15.0	12.8	65.7	62.5	61.8	15.0	22.5	25.4	0.0	0.0	0.0
Total	40	3,365	100.0	1,139	0.0	0.0	0.0	19.3	15.0	12.8	65.7	62.5	61.8	15.0	22.5	25.4	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Monroe/ Escambia County AA	20	2,265	100.0	923	5.4	15.0	2.4	17.1	20.0	23.3	75.4	65.0	73.6	0.0	0.0	0.0	2.1	0.0	0.8
Total	20	2,265	100.0	923	5.4	15.0	2.4	17.1	20.0	23.3	75.4	65.0	73.6	0.0	0.0	0.0	2.1	0.0	0.8

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Monroe/ Escambia County AA	40	3,365	100.0	1,139	27.6	12.5	4.1	17.7	20.0	13.9	18.7	20.0	21.6	36.0	42.5	41.0	0.0	5.0	19.4
Total	40	3,365	100.0	1,139	27.6	12.5	4.1	17.7	20.0	13.9	18.7	20.0	21.6	36.0	42.5	41.0	0.0	5.0	19.4

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Monroe/ Escambia County AA	20	2,265	100.0	923	26.6	15.0	7.8	18.4	10.0	20.0	19.8	15.0	24.7	35.3	60.0	34.1	0.0	0.0	13.3
Total	20	2,265	100.0	923	26.6	15.0	7.8	18.4	10.0	20.0	19.8	15.0	24.7	35.3	60.0	34.1	0.0	0.0	13.3

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Monroe/ Escambia County AA	40	3,553	100.0	724	0.0	0.0	0.0	27.4	20.0	28.9	51.1	70.0	55.0	21.5	10.0	16.2	0.0	0.0	0.0
Total	40	3,553	100.0	724	0.0	0.0	0.0	27.4	20.0	28.9	51.1	70.0	55.0	21.5	10.0	16.2	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Monroe/ Escambia County AA	20	2,035	100.0	617	7.3	0.0	7.1	18.5	5.0	19.4	72.5	85.0	70.7	0.0	0.0	0.0	1.7	10.0	2.8
Total	20	2,035	100.0	617	7.3	0.0	7.1	18.5	5.0	19.4	72.5	85.0	70.7	0.0	0.0	0.0	1.7	10.0	2.8

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Monroe/ Escambia County AA	40	3,553	100.0	724	76.2	75.0	40.6	5.3	25.0	18.4	0.0
Total	40	3,553	100.0	724	76.2	75.0	40.6	5.3	25.0	18.4	0.0

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Monroe/ Escambia County AA	20	2,035	100.0	617	82.0	65.0	47.2	3.8	35.0	14.2	0.0
Total	20	2,035	100.0	617	82.0	65.0	47.2	3.8	35.0	14.2	0.0

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.