

PUBLIC DISCLOSURE

November 3, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bank of Alabama
Certificate Number: 2832

120 North Street East
Talladega, Alabama 35160

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

10 10th Street Northeast, Suite 900
Atlanta, Georgia 30309-3849

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

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INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment areas' credit needs.
- The bank originated a majority of its small business and home mortgage loans in the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among businesses of different sizes and individuals of different income levels.
- The institution did not receive any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas. The institution met these needs through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the assessment areas.

DESCRIPTION OF INSTITUTION

First Bank of Alabama (First Bank) is a state non-member bank headquartered in Talladega, Alabama. FirstBanc of Alabama, Inc., Talladega, Alabama, a one-bank holding company, wholly owns First Bank. The bank does not have any subsidiaries or affiliates. The bank received a Satisfactory rating at its previous FDIC CRA Performance Evaluation, dated May 10, 2022, based on the Federal Financial Institutions Examination Council (FFIEC) Interagency Intermediate Small Bank examination procedures.

First Bank has experienced changes in its branch network since the previous evaluation. Currently, the bank operates 14 full-service branch locations, including its main office, throughout seven counties in the state of Alabama. On October 1, 2022, First Bank acquired the Heflin and Ranburne branches from Southern States Bank. Additionally, the Anniston branch was opened on May 1, 2024, and the Childersburg branch was opened on June 23, 2025. No branches have been closed since the previous evaluation.

The institution offers a full range of banking products and services. First Bank's business strategy continues to focus on the commercial and consumer residential real estate markets. The consumer loan products include auto loans, residential loans, home equity loans, personal installment loans, credit cards, and quick installment loans (Buy Now, Pay Later) through Quilo. Also, to better serve the needs of its customers, the bank offers consumers small-dollar, short-term loans in amounts of \$2,000 or less. Additionally, in August 2025, the bank allocated \$25 million to a promotional 30-year first mortgage product targeted to assist low- and moderate-income families with purchasing or refinancing a residence. The commercial loan products include commercial real estate, agricultural, term, and working capital loans, and lines of credit. Various consumer and commercial deposit products and services are available, which include checking, savings, and certificates of deposit as well as individual retirement accounts. In addition, the bank offers investment and insurance services through its third-party provider. First Bank also offers internet and mobile banking, mobile check deposit, electronic bill pay, automated clearinghouse services, and deposit-taking ATMs at each branch.

According to the September 30, 2025 Consolidated Reports of Condition and Income (Call Report), First Bank reported total assets of \$1.1 billion, total loans of \$735.8 million, total deposits of \$997.6 million, and total securities of \$234.9 million. As shown in the following table, commercial loans, which include loans secured by non-farm, non-residential properties and commercial and industrial loans, represent the largest portion of the loan portfolio at 59.8 percent. This is followed by home mortgage loans, which include 1-4 family residential and multifamily properties, at 24.7 percent of the loan portfolio.

Loan Portfolio Distribution as of 9/30/2025		
Loan Category.	\$(000s)	%
Construction, Land Development, and Other Land Loans	86,616	11.8
Secured by Farmland	9,611	1.3
Secured by 1-4 Family Residential Properties	152,525	20.7
Secured by Multifamily (5 or more) Residential Properties	28,998	4.0
Secured by Nonfarm Nonresidential Properties	313,023	42.5
Total Real Estate Loans	590,773	80.3
Commercial and Industrial Loans	127,604	17.3
Agricultural Production and Other Loans to Farmers	1,820	0.2
Consumer Loans	13,972	2.0
Obligations of State and Political Subdivisions in the U.S.	2,241	0.3
Other Loans	986	0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	1,574	0.2
Total Loans	735,822	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial or legal impediments that would limit the institution’s ability to meet the credit needs of its assessment areas. However, during the evaluation timeframe, there were two Federal Emergency Management Agency (FEMA) declared disasters impacting the assessment areas, and they may have been a lending impediment. The national declared disasters were DR-4710-AL Alabama Severe Storms, Straight-line Winds, and Tornadoes, declared on May 5, 2023; and DR-4684-AL Alabama Severe Storms, Straight-line Winds, and Tornadoes, declared on January 15, 2023.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas in which examiners will evaluate the bank’s CRA performance. First Bank designated three assessment areas, one of which has been modified slightly since the previous evaluation. The Alabama Non-Metropolitan Statistical Area (MSA) Assessment Area was expanded to include Coosa County, while continuing to include Clay, Cleburne, Talladega, and Randolph counties. The Chilton County Assessment Area remains unchanged since 2021, which includes all of Chilton County, and the Anniston-Oxford MSA Assessment Area continues to consist of portions of Calhoun County. The following table provides details on the bank’s designated assessment areas.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of Census Tracts	# of Branches
Alabama Non-MSA	Clay, Cleburne, Coosa, Talladega, and Randolph Counties	41	12
Anniston-Oxford MSA	Portion of Calhoun County	20	1
Chilton County	Chilton County	12	1

Source: Bank Data and 2020 Census Data

The evaluation includes separate discussions for each of the three assessment areas. Refer to the individual assessment area sections for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated May 10, 2022, to the current evaluation dated November 3, 2025. Examiners used Intermediate Small Institution Examination Procedures to evaluate First Bank’s CRA performance. As described in the Appendices, these procedures include the Lending and Community Development Tests. Examiners evaluated the bank’s lending data, deposit activity, and number of branches for each assessment area to determine their respective weighting for the overall conclusions and ratings. The Alabama Non-MSA Assessment Area contained a significant majority of the deposits, branches, and loans originated during the evaluation period, followed by the Anniston-Oxford MSA Assessment Area. The Chilton County Assessment Area received the least weight due to the limited lending and deposit activity. As such, the Alabama Non-MSA Assessment Area received the most weight in determining the overall rating. Examiners conducted a full-scope review of performance in each assessment area. The following table details the bank’s loans, deposits, and branches by assessment area that were analyzed during this evaluation.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans*		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Alabama Non-MSA	52,828	80.2	900,906	88.6	12	85.8
Anniston-Oxford MSA	12,156	18.4	87,945	8.7	1	7.1
Chilton County	922	1.4	27,417	2.7	1	7.1
Total	65,906	100.0	1,016,268	100.0	14	100.0

Source: 2022, 2023, 2024 HMDA Data; Bank Data; FDIC Summary of Deposits (6/30/2025).
**Community development loans not included in totals.*

Activities Reviewed

The CRA regulation requires a review of a bank’s lending performance in its assessment areas with respect to home mortgage, small business, and small farm lending, if significant. Based upon First Bank’s business strategy, loan portfolio mix, and the number and dollar volume of loans originated during the evaluation period, examiners determined the major lending focus continues to be commercial lending, followed by home mortgage lending. Consequently, small business lending

will be given the most weight, followed by home mortgage loans in determining the conclusions and overall rating. Small farm and consumer loans were not evaluated as they do not represent major product lines for the bank. Bank records and discussions with management indicate that the lending focus and product mix remained consistent throughout the evaluation period.

For the Lending Test, examiners reviewed all small business loans originated in 2024. In total, the bank originated 183 small business loans totaling \$32.1 million during this timeframe. Examiners reviewed the universe of small business loans to evaluate the Assessment Area Concentration criterion. The Geographic Distribution criterion was evaluated using the 123 small business loans inside the bank's assessment areas, which totaled \$16.6 million. Additionally, examiners reviewed a random sample of 89 small business loans totaling \$12.1 million to evaluate the Borrower Profile criterion, as income data was not readily available for the universe of loans. The bank is not subject to CRA small business loan data collection and reporting requirements; therefore, examiners did not compare the bank's performance to aggregate small business lending data. Instead, examiners compared the bank's small business lending performance to the 2024 D&B business demographic data.

For the Lending Test, examiners also reviewed all loans subject to the Home Mortgage Disclosure Act (HMDA) for 2022, 2023, and 2024. The 2022 HMDA Loan Application Register included 191 originated loans totaling \$41.7 million, the 2023 HMDA Loan Application Register included 166 originated loans totaling \$34.9 million, and the 2024 HMDA Loan Application Register included 145 originated loans totaling \$27.9 million. Examiners reviewed the universe of HMDA loans to evaluate the Assessment Area Concentration criterion. All loans within the assessment areas were reviewed to evaluate the Geographic Distribution and Borrower Profile criteria. Examiners compared the bank's 2022, 2023, and 2024 home mortgage lending performance to respective HMDA aggregate data, and demographic data based on the 2020 U.S. Census data.

Examiners reviewed the number and dollar volume of small business and home mortgage loans. While the tables throughout this evaluation present both the number and dollar volume of loans, examiners emphasized performance by number of loans, as the number of loans is a better indicator of the number of businesses and individuals served.

For the Community Development Test, examiners reviewed data provided by management on community development loans, qualified investments, and community development services since the previous CRA evaluation. Additionally, qualified investments purchased prior to the previous evaluation and have an outstanding book value as of the current evaluation date were considered.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test is rated Satisfactory. The bank's performance under the Loan-to-Deposit Ratio, Assessment Area Concentration, Geographic Distribution, and Borrower Profile criteria supports this conclusion.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution’s size, financial condition, and the assessment areas’ credit needs. The average net loan-to-deposit ratio, calculated from Call Report data, averaged 70.8 percent over the previous 14 calendar quarters from June 30, 2022, to September 30, 2025. The ratio ranged from a low of 66.2 percent as of December 31, 2024, to a high of 74.9 percent as of September 30, 2023. Examiners noted the bank’s ratio has exhibited a declining trend since the highest percentage noted in 2023. The downward movement reflects that the loan growth has not kept pace with the deposit growth.

The average net loan-to-deposit ratio was compared to three similarly situated institutions. Examiners selected these institutions based on their similar area, asset size, branch network, and lending focus. As shown in the following table, the bank’s ratio remains within a moderate range relative to the similarly situated institutions, suggesting a continued capacity to fund lending activities through core deposits.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 9/30/2025 (\$000s)	Average Net Loan-to-Deposit Ratio (%)
First Bank of Alabama, Talladega, Alabama	1,124,896	70.8
Peoples Bank of Alabama, Cullman, Alabama	1,424,720	68.8
Metro Bank, Pell City, Alabama	1,149,778	55.3
SouthPoint Bank, Birmingham, Alabama	1,596,315	103.8

Source: Reports of Condition and Income 6/30/2022 – 9/30/2025

Assessment Area Concentration

The bank originated a majority of home mortgage and small business loans by number volume within the assessment areas. While overall the bank originated a majority of home mortgage and small business loans by dollar volume outside of the assessment areas, examiners emphasized performance by number volume. The following table illustrates the combined assessment area concentration analysis.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	126	66.0	65	34.0	191	16,150	38.7	15,575	61.3	41,725
2023	110	66.3	56	33.7	166	16,615	47.6	18,306	52.4	34,921
2024	111	76.6	34	23.4	145	16,530	59.3	11,323	40.7	27,853
Subtotal	347	69.1	155	31.9	502	49,295	47.2	55,204	52.8	104,499
Small Business	123	67.2	60	32.8	183	16,611	51.7	15,530	48.3	32,141
Total	470	68.6	215	31.4	685	65,906	48.2	70,734	51.8	136,640

Source: Bank Data; Due to rounding, totals may not equal 100.0%.

Geographic Distribution

Overall, the geographic distribution of small business and home mortgage loans reflects reasonable dispersion throughout the assessment areas. The bank's reasonable performance in the Alabama Non-MSA and Anniston-Oxford MSA Assessment Areas supports this conclusion. The bank's poor performance in the Chilton County Assessment Area received the least weight due to limited lending in the area. While this is not a new assessment area, the bank is still developing its footprint within this area. For this criterion, examiners focused on the percentage of small business and home mortgage loans in the low- and moderate-income census tracts.

Borrower Profile

Overall, the distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration to businesses of different sizes and individuals of different income levels. The bank's overall reasonable performance in the Alabama Non-MSA and Anniston-Oxford MSA Assessment Areas supports this conclusion. The bank's poor performance in the Chilton County Assessment Area received the least weight due to limited lending. While this is not a new assessment area, the bank is still developing its footprint within this area. For this criterion, examiners focused on the percentage of small business loans to operations with gross annual revenues of \$1 million or less, and percentage of home mortgage loans to low- and moderate-income borrowers.

Response to Complaints

The bank has not received any CRA-related complaints since its previous CRA evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

Overall, First Bank demonstrated adequate responsiveness to the community development needs of the institution-wide assessment area through community development loans, qualified investments, and community development services. Examiners considered First Bank's capacity and the need and availability of such opportunities for community development in reaching this conclusion. A majority of First Bank's community development loans, qualified investments, and community development services by number volume were in the Alabama Non-MSA Assessment Area. Additionally, comparable banks are used in the analysis to help provide perspective on a bank's performance. For this evaluation, examiners reviewed the activities of two similarly situated institutions also evaluated using Intermediate Small Bank Examination Procedures.

Community Development Loans

During the evaluation period, First Bank originated 56 community development loans totaling \$11.9 million. This level of lending activity represents 1.8 percent of average total loans, and 1.2 percent of average total assets since the previous evaluation. First Bank's community development lending ratios are lower than the similarly situated institutions' ratios. Specifically, the similarly situated institutions' community development loans totaled 3.4 and 7.3 percent of average total loans, and 1.6 and 4.5 percent of average total assets. Although the dollar volume of community development loans is lower than the bank's performance at the previous evaluation of \$27.7 million, there is a significant increase in the number volume of loans since previous evaluation of 35 loans, which shows effort. While community development opportunities are generally limited, First Bank

demonstrated its responsiveness to the credit needs in the assessment areas. Refer to the Community Development Loans section of each assessment area for further details. The following table illustrates the bank’s community development lending by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	5	1,628	1	100	-	-	1	100	7	1,828
2023	10	1,694	3	562	-	-	5	371	18	2,627
2024	8	305	5	3,136	2	410	6	950	21	4,801
Year-to-Date 2025	6	1,289	1	1,100	-	-	3	275	10	2,664
Total	29	4,916	10	4,898	2	410	15	1,696	56	11,920

Source: Bank Data from July 1, 2022, through July 31, 2025

As shown in the following table, the bank exhibited the strongest performance in the Alabama Non-MSA Assessment Area, which received the greatest weight among the three assessment areas. The bank also made 24 community development loans totaling \$3.5 million outside of the assessment areas, but within a broader statewide or regional area that includes the bank’s assessment areas.

Community Development Lending by Assessment Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama Non-MSA	6	1,525	7	4,662	2	410	14	1,596	29	8,193
Anniston-Oxford MSA	-	-	3	236	-	-	-	-	3	236
Chilton County	-	-	-	-	-	-	-	-	-	-
Statewide Activities	1	1,232	-	-	-	-	-	-	1	1,232
Regional Activities	22	2,159	-	-	-	-	1	100	23	2,259
Total	29	4,916	10	4,898	2	410	15	1,696	56	11,920

Source: Bank Data

The following are examples of the bank’s lending activities that benefited broader statewide or regional areas that include the bank’s assessment areas.

- The bank continues to participate in the Alabama Multi-Family Loan Consortium (AMLC). The AMLC is a non-profit organization that provides financing for affordable housing throughout Alabama. During the review period, the bank participated in 17 loans, with the bank’s portion totaling \$2.0 million. The loans provided financing for 1,077 housing units for low- and moderate-income individuals.
- In 2023, the bank originated a \$1.2 million loan to purchase two mobile home parks containing a total of 80 lots in Anniston and Talladega. The purpose of the loan was to preserve naturally occurring affordable housing within the assessment areas. The monthly rents, ranging from \$300 to \$600, are significantly below the area’s fair market rents for housing, making them accessible to low- and moderate-income individuals.

Qualified Investments

First Bank made 282 qualified investments totaling \$19.8 million. The bank’s qualified investments equate to 1.9 percent of average total assets, and 9.5 percent of average total securities since the previous evaluation. The bank’s dollar volume of qualified investments exceeds its performance from the previous evaluation of \$13.7 million. Additionally, First Bank’s level of qualified investment activity exceeds the ratios of the similarly situated institutions. Specifically, the similarly situated institutions’ qualified investments totaled 0.8 and 0.1 of average total assets, and 2.2 and 0.8 percent of average total securities. The qualified investments include 28 investments totaling \$19.2 million, and \$596,000 in donations that supported community services and economic development. The qualified investments provided since the previous evaluation are responsive to the community development opportunities. The following table presents the number of qualified investments by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	4	2,302	2	818	22	16,040	28	19,160
2022	-	-	-	-	-	-	-	-	-	-
2023	-	-	-	-	-	-	-	-	-	-
2024	-	-	-	-	-	-	-	-	-	-
Subtotal	-	-	4	2,302	2	818	22	16,040	28	19,160
Qualified Grants & Donations	-	-	211	506	43	90	-	-	254	596
Total	-	-	215	2,808	45	908	22	16,040	282	19,756

Source: Bank Data

Community Development Services

During the evaluation period, First Bank’s directors, management, and staff participated in 47 community development activities by serving on multiple Boards and committees, or by providing financial and technical expertise to various community development organizations. The number of community development services increased from the prior CRA performance evaluation when the bank had 34 community development services. The bank’s level of community development services is comparable to that of the similarly situated institutions, which reported 43 and 57 services. Overall, the community development services were responsive to the needs of the assessment areas. The following tables illustrate the number of community development services by activity year, purpose, and assessment area.

Community Development Services by Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	-	9	4	-	13
2023	-	16	3	-	19
2024	-	13	2	-	15
Total	-	38	9	-	47
<i>Source: Bank Data</i>					

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Alabama Non-MSA	-	33	3	-	36
Anniston-Oxford MSA	-	1	6	-	7
Chilton County	-	3	-	-	3
Statewide Activities		1			1
Total	-	38	9	-	47
<i>Source: Bank Data</i>					

In addition to the services noted above, First Bank offers a checking and savings account with no required minimum opening deposit or monthly services charges. This product is beneficial to low- and moderate-income individuals within the assessment areas.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

ALABAMA NON-MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ALABAMA NON-MSA

The Alabama Non-MSA Assessment Area consists of Clay, Coosa, Cleburne, Talladega, and Randolph counties in its entirety. The bank operates 12 full-service branches and six standalone ATMs in the assessment area.

Economic and Demographic Data

According to the 2020 U.S. Census data, the assessment area reflects the following income designations: 1 low-, 8 moderate-, 23 middle-, and 9 upper-income census tracts. The following table illustrates the most recent demographic characteristics of the assessment area.

Demographic Information of the Assessment Area							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #	
Geographies (Census Tracts)	41	2.4	19.5	56.1	22.0	0.0	
Population by Geography	143,795	2.2	17.4	56.4	24.1	0.0	
Housing Units by Geography	70,474	2.3	15.4	60.1	22.2	0.0	
Owner-Occupied Units by Geography	41,266	0.9	13.6	60.5	25.0	0.0	
Occupied Rental Units by Geography	14,134	7.4	27.5	48.3	16.8	0.0	
Vacant Units by Geography	15,074	1.4	8.9	70.3	19.5	0.0	
Businesses by Geography	8,597	1.3	16.9	59.0	22.8	0.0	
Farms by Geography	354	0.0	6.5	67.2	26.3	0.0	
Family Distribution by Income Level	37,094	21.4	17.3	19.6	41.7	0.0	
Household Distribution by Income Level	55,400	24.5	15.9	15.7	44.0	0.0	
Alabama Non-MSA Median Family Income	\$55,763	Median Housing Value				\$ 114,458	
		Median Gross Rent				\$648	
		Families Below Poverty Level				13.6%	
<i>Source: 2020 Census and 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>							

The assessment area’s largest industries are non-classifiable establishments at 17.3 percent, followed by other services (except Public Administration) at 11.4 percent, retail trade at 10.8 percent, construction at 7.4 percent, and administrative support and waste management/remediation services at 7.1 percent. The largest employers within the assessment area based on the largest number of employees include the following: Wellborn Cabinet, Inc., Koch Foods, Inc., Nemak, Coosa Valley Medical Center, Bell L E Construction Co., Madix, Inc., and Dixie Group, Inc.

Examiners used the FFIEC-updated median family income (MFI) figures to analyze home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income MFI categories for the Alabama Non-MSA Assessment Area.

Median Family Income Ranges					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2022	\$ 63,200	< \$31,600	\$31,600 to < \$ 50,560	\$50,560 to < \$ 75,840	>=\$75,840
2023	\$ 65,700	< \$32,850	\$32,850 to < \$52,560	\$52,560 to < \$78,840	>= \$78,840
2024	\$ 67,600	< \$33,800	\$33,800 to < \$54,080	\$54,080 to < \$81,120	>= \$81,120
<i>Source: FFIEC</i>					

Competition

The market for competitive financial services within the assessment area is highly competitive. According to FDIC Deposit Market Share data as of June 30, 2025, 11 financial institutions operated 31 offices within the assessment area. First Bank ranked first, holding 42.3 percent of total deposits. The remaining institutions include FirstState Bank, Southern States Bank, Cadence Bank, Metro Bank, Regions Bank, Renasant Bank, Wells Fargo Bank, N.A., PNC Bank, N.A., Noble Bank & Trust, and Truist Bank, accounting for a combined 57.7 percent of deposits.

There is a moderate level of competition for small business loans within the assessment area. First Bank is not required to collect small business data; therefore, the Lending Test analysis does not include a comparison to aggregate performance. However, the 2024 aggregate data show that 65 lenders reported 1,515 small business loans originated or purchased within the assessment area. The top three lenders, by number of loans, included American Express National Bank, JP Morgan Chase Bank, NA, and Capital One, N.A, and accounted for 44.5 percent of all reported small business lending.

In addition, significant competition exists in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to the 2024 Peer Mortgage Data, 254 institutions reported 2,872 originated and purchased residential mortgage loans in the assessment area. By number of loans, First Bank ranked fifth, holding a 3.2 percent market share, indicating a very small presence relative to the overall market. The top three lenders by number of loans included PennyMac Loan Services, LLC, 21st Mortgage Corporation, and Rocket Mortgage, LLC, which collectively accounted for 14.9 percent of all reported mortgage loans.

Community Contact

As part of the CRA evaluation process, examiners contact third parties active in the assessment area to help identify the credit and community development needs and opportunities of the assessment area. For this CRA evaluation, examiners conducted an interview with a representative from a community-based, non-profit organization that provides low- and moderate-income individuals with opportunities to become financially literate and gainfully employed. The contact noted difficulty for low- and moderate-income individuals to acquire basic needs because they are either unemployed or underemployed, do not know anything about home ownership or buying a vehicle, and do not save money. The difficulty is because of limited financial knowledge and limited access

to transportation, childcare, and affordable housing. As a result, the contact identified a significant need for financial literacy education to serve and educate low- and moderate-income individuals.

Credit and Community Development Needs and Opportunities

Considering the community contact information, demographics, and economic data, examiners determined affordable home mortgage loans represent the primary credit need of the area. Also, workforce development via financial literacy classes, job readiness skills, and gainful employment with a living wage would be critical to the bank’s ability to grant home mortgage loans to low- and moderate-income individuals. The percentage of borrowers with low-income (21.4 percent) compared to the bank’s lending penetration to such borrowers (5.5 percent), and the information obtained from the community contact support the conclusion that there is a need for affordable home mortgage lending. Furthermore, the relatively high number of low- and moderate-income families combined with the assessment area’s poverty rate indicates a need for affordable housing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ALABAMA NON-MSA

LENDING TEST

First Bank demonstrated satisfactory performance under the Lending Test within the assessment area. The reasonable Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The reasonable small business and home mortgage lending performance supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank’s performance in the low-income census tract was comparable to demographic data, but the bank’s lending in the moderate-income census tracts was significantly below the demographic data. However, given the level of competition in the assessment area, the lending performance is reasonable.

Geographic Distribution of Small Business Loans Alabama Non-MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	1.3	1	1.1	64	0.5
Moderate	16.9	6	6.5	962	8.1
Middle	59.0	54	58.1	7,398	62.4
Upper	22.8	32	34.4	3,436	29.0
NA	0.0	0	0.0	0	0.0
Total	100.0	93	100.0	11,860	100.0

Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Although the bank originated no loans within the low-income census tract in 2024, the bank's performance in the low-income census tract was higher than the demographic data and aggregate data in 2022 and 2023. For the moderate-income census tracts, the bank's performance was below both the demographic and aggregate data in 2024. However, the bank's performance was similar to demographic and aggregate data in 2022 and 2023. Given the bank's overall performance, the distribution of home mortgage loans is reasonable. See the following table for details.

Geographic Distribution of Home Mortgage Loans Alabama Non-MSA						
Tract Income Level	% of Owner-Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	0.9	0.5	2	1.9	90	0.7
2023	0.9	0.6	4	4.2	145	1.0
2024	0.9	0.4	0	0.0	0	0.0
Moderate						
2022	13.6	10.5	10	9.4	640	4.8
2023	13.6	12.8	15	15.6	1,435	9.9
2024	13.6	12.3	3	3.3	240	1.8
Middle						
2022	60.5	56.6	69	64.5	8,065	61.0
2023	60.5	58.6	57	59.4	9,990	69.0
2024	60.5	57.1	62	68.1	9,557	72.1
Upper						
2022	25.0	32.4	26	24.3	4,420	33.5
2023	25.0	28.0	20	20.8	2,919	20.2
2024	25.0	30.2	26	28.6	3,467	26.1
NA						
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.2	0	0.0	0	0.0
2024	0.0	0.1	0	0.0	0	0.0
Total						
2022	100.0	100.0	107	100.0	13,215	100.0
2023	100.0	100.0	96	100.0	14,489	100.0
2024	100.0	100.0	91	100.0	13,264	100.0

Source: 2020 Census; Bank Data; 2022, 2023, and 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels. The bank’s reasonable penetration of small business and home mortgage loans supports this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank’s lending performance to businesses with revenues of \$1 million or less trailed demographic data. However, the bank granted 28.2 percent of its loans by number to the smallest revenue category, and it maintained a meaningful level of lending across the other smaller revenue categories. Considering these lending patterns and the composition of businesses within the assessment area, the bank’s performance is reasonable.

Distribution of Small Business Loans by Gross Annual Revenue Category Alabama non-MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	60.6	20	28.2	1,366	16.1
\$100,000 - \$249,999	18.6	10	14.1	500	5.9
\$250,000 - \$499,999	4.3	10	14.1	1,156	13.6
\$500,000 - \$1,000,000	2.2	8	11.3	571	6.7
Subtotal <= \$1,000,000	85.7	48	67.6	3,593	42.4
>\$1,000,000	2.4	23	32.4	4,879	57.6
Revenue Not Available	11.9	0	0.0	0	0.0
Total	100.0	71	100.0	8,472	100.0
<i>Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. As illustrated in the following table, while the percentage of loans to low-income borrowers was below the percentage of families, it was comparable to aggregate lending data for all three years reviewed. The bank’s lending performance to moderate-income borrowers was commensurate to both the percentage of families and aggregate data, further supporting a conclusion of reasonable performance.

Distribution of Home Mortgage Loans by Borrower Income Level Alabama Non-MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	21.5	6.6	10	9.4	410	3.1
2023	21.5	5.1	7	7.3	231	1.6
2024	21.4	4.2	5	5.5	222	1.7
Moderate						
2022	17.3	17.0	19	17.8	1,035	7.8
2023	17.3	15.8	13	13.5	771	5.3
2024	17.3	14.1	16	17.6	1,079	8.1
Middle						
2022	19.6	23.4	25	23.4	2,745	20.8
2023	19.6	22.5	17	17.7	1,581	10.9
2024	19.6	23.3	18	19.8	1,661	12.5
Upper						
2022	41.5	37.2	46	43.0	7,310	55.3
2023	41.5	38.7	43	44.8	7,439	51.3
2024	41.7	36.0	42	46.2	7,140	53.8
NA						
2022	0.0	15.8	7	6.5	1,715	13.0
2023	0.0	18.0	16	16.7	4,467	30.8
2024	0.0	22.5	10	11.0	3,162	23.8
Total						
2022	100.0	100.0	107	100.0	13,215	100.0
2023	100.0	100.0	96	100.0	14,489	100.0
2024	100.0	100.0	91	100.0	13,264	100.0
<i>Source: 2020 Census; Bank Data; 2022, 2023, and 2024 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.</i>						

COMMUNITY DEVELOPMENT TEST

First Bank demonstrated adequate responsiveness to the community development needs in the Alabama Non-MSA Assessment Area through community development loans, qualified investments, and community development services.

Community Development Loans

The bank originated 29 community development loans totaling \$8.2 million within the Alabama Non-MSA Assessment Area. This performance represents 51.8 percent by number, and 68.7 percent by dollar volume of bank-wide community development loans originated during the evaluation period. Below are examples of community development loans that were originated in the assessment area.

- In 2023, the bank renewed a \$500,000 line of credit to fund payroll, facility improvements, and equipment upgrades for a board of education that serves multiple schools located in distressed or underserved nonmetropolitan middle-income areas.
- In 2024, the bank originated a \$340,000 loan for a business to purchase and renovate a commercial building located in a distressed/underserved nonmetropolitan middle-income census tract. The loan allowed the borrower to rehabilitate a formerly vacant restaurant property and prepare it for lease to a new business, supporting the retention of existing residents/businesses and attraction of new commercial activity in the assessment area.
- In 2024 and 2025, the bank originated two loans totaling \$2.1 million to help a college located within a moderate-income census tract continue providing education and community services to low- and moderate-income areas/individuals surrounding the college.

Qualified Investments

First Bank provided 223 qualified investments and donations totaling \$12.5 million in the Alabama Non-MSA Assessment Area. This level of activity represents 79.1 percent by number, and 63.3 percent by dollar volume of bank-wide qualified investments. Below are examples of qualified investments and donations within this assessment area.

- The bank had six investments totaling \$5.2 million to fund capital improvements to the water, sewage, gas, and/or electric supply systems throughout the assessment area, benefiting low- and moderate-income areas/individuals within Talladega County, and stabilizing or revitalizing underserved and distressed non-metropolitan middle-income geographies in Randolph County.
- Several donations were made to sponsor academic, athletic, or extracurricular activities held for students from various schools that had a majority of the students eligible to receive free or reduced-price lunch. For example, one large \$35,000 donation was provided annually during the spring of 2022, 2023, and 2024 to sponsor a program for science, technology, engineering, and mathematics (STEM) for approximately 600 students. Additionally, in 2024, the bank sponsored two more STEM programs hosted by the Talladega Superspeedway totaling \$56,300 and serving hundreds of students.

Community Development Services

During the evaluation period, bank representatives provided 36 community development services to organizations that supported community services and economic development. This level of community development services in the assessment area represents 76.6 percent of the total community development services during the review period, and reflects an increase since the previous evaluation when the bank provided 21 services. The following are notable examples of the bank's community development services in the assessment area.

- In 2022, 2023, and 2024, a bank officer served as a Board member of a non-profit organization that provides services to low- and moderate-income individuals, such as providing food, clothing, and financial assistance with utility bills.
- In 2022, 2023, and 2024, several bank officers or employees taught financial literacy classes at different schools where a majority of students were eligible to participate in the free- or reduced-lunch program.

- In 2022, 2023, and 2024, a bank employee served as a Board member of a non-profit organization that provides meals to low- and moderate-income individuals and families.
- In 2022, 2023, and 2024, multiple bank officers or employees served as Board chair, Board member, or president of organizations promoting small business development.

ANNISTON-OXFORD MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ANNISTON- OXFORD MSA

The Anniston-Oxford MSA Assessment Area consists of a portion of Calhoun County. The bank operates one full-service branch in the assessment area, which is in a middle-income census tract.

Economic and Demographic Data

According to the 2020 U.S. Census Data, the assessment area reflects the following income designations: one low-, six moderate-, eight middle-, and four upper-income census tracts, as well as one census tract without an income designation. The following table illustrates the most recent demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Anniston-Oxford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	20	5.0	30.0	40.0	20.0	5.0
Population by Geography	58,771	3.9	20.9	48.5	24.8	1.9
Housing Units by Geography	28,733	5.9	21.4	44.5	25.0	3.2
Owner-Occupied Units by Geography	15,493	3.9	18.6	44.9	30.4	2.1
Occupied Rental Units by Geography	7,848	8.6	24.1	42.9	22.5	2.0
Vacant Units by Geography	5,392	7.8	25.4	45.9	13.1	7.8
Businesses by Geography	5,317	4.3	20.5	47.1	26.5	1.5
Farms by Geography	42	4.8	23.8	47.6	23.8	0.0
Family Distribution by Income Level	14,852	22.6	19.7	18.1	39.5	0.0
Household Distribution by Income Level	23,341	26.1	18.4	16.5	39.0	0.0
Median Family Income MSA - 11500 Anniston-Oxford, AL MSA		\$59,609	Median Housing Value		\$ 109,263	
			Median Gross Rent		\$751	
			Families Below Poverty Level		10.7%	
<i>Source: 2020 Census and 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The assessment area’s largest industries are non-classifiable establishments at 16.7 percent; followed by other services (except Public Administration) at 12.0 percent; retail trade at 10.8 percent; health care and social assistance at 9.3 percent; and professional, scientific, and technical services at 8.0 percent. According to Moody’s Economy.com, Inc., Précis Metro (Moody’s), dated November 16, 2025, the Anniston-Oxford MSA’s largest employers include the following: Anniston Army Depot, Honda Manufacturing Alabama, N.E. Alabama Regional Medical Center, Jacksonville State University, and Homeland Security Domestic Preparedness.

In addition, Moody’s noted that the economy in the Anniston-Oxford MSA has seen very little growth recently. The area relies heavily on car manufacturing, specifically in the local Honda plant, which remains the biggest source of stability for jobs. However, the area is struggling because the population is shrinking and younger workers are moving away, making it hard for businesses to find employees. The housing market is also slow, with fewer home sales due to high interest rates and the lack of population growth.

Examiners used the FFIEC-updated MFI figures to analyze home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income MFI categories for the Anniston-Oxford MSA Assessment Area.

Estimated Median Family Income Ranges Anniston-Oxford MSA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2022	\$ 68,800	< \$ 34,400	\$ 34,400 to < \$55,040	\$55,040 to < \$85,560	≥ \$82,560
2023	\$ 74,100	< \$37,050	\$37,050 to < \$59,280	\$59,280 to < \$88,920	≥ \$88,920
2024	\$ 73,600	< \$36,800	\$36,800 to < \$58,880	\$58,880 to < \$88,320	≥ \$88,320
<i>Source: FFIEC</i>					

Competition

The market for competitive financial services within the assessment area is highly competitive. According to FDIC Deposit Market Share data as of June 30, 2025, 10 financial institutions operated 30 offices within the assessment area. First Bank ranked ninth, holding 3.7 percent of total deposits. The remaining institutions include Regions Bank, Southern States, Noble Bank & Trust, Wells Fargo Bank, N.A., Farmers and Merchants Bank, Investar Bank, N.A., Truist Bank, PNC Bank, N.A., and Woodforest National Bank, accounting for a combined 96.3 percent of deposits.

There is a moderate level of competition for small business loans within the assessment area. First Bank is not required to collect small business data; therefore, the Lending Test analysis does not include a comparison to aggregate performance. However, the 2024 aggregate data show that 60 lenders reported 1,284 small business loans originated or purchased within the assessment area. The top three lenders, by number of loans, include American Express National Bank, JP Morgan Chase Bank, NA, and Synchrony Bank, and they accounted for 53.0 percent of all reported small business lending.

In addition, significant competition exists in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to the 2024 Peer Mortgage Data, 153 institutions reported 1,168 originated and purchased residential mortgage loans in the assessment area. By number of loans, First Bank ranked 19th, holding a 1.5 percent market share, indicating a very small presence relative to the overall market. The top three lenders by number of loans included Rocket Mortgage, LLC, PennyMac Loan Services, LLC, and United Wholesale Mortgage, LLC, which collectively accounted for 17.4 percent of all reported mortgage loans.

Community Contact

Examiners conducted an interview with a representative from a community-based, non-profit organization that provides low- and moderate-income individuals with opportunities to become financially literate and gainfully employed. The contact noted difficulty for low- and moderate-income individuals to acquire basic needs because they are either unemployed or underemployed, do not know anything about home ownership or buying a vehicle, and do not save money. The difficulty is because of limited financial knowledge and limited access to transportation, childcare, and affordable housing. As a result, the contact identified a significant need for financial literacy to educate low- and moderate-income individuals about how to establish adequate income and credit to buy a home.

Credit and Community Development Needs and Opportunities

Considering the community contact information, demographics, and economic data, examiners identified affordable home mortgage loans represent the primary credit need of the assessment area. Additionally, workforce development via financial literacy classes, job readiness skills, and gainful employment with a living wage would be critical to the bank's ability to grant home mortgage loans to low- and moderate-income individuals. The percentage of families that are low-income (22.6 percent) and moderate-income (19.7 percent) compared to the bank's lending penetration to such borrowers (5.9 percent and 0.0 percent, respectively), and the information obtained from the community contact support the conclusion that there is a need for affordable home mortgage lending. Further, the relatively high number of low- and moderate-income families combined with the assessment area's poverty rate indicates a need for affordable housing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ANNISTON-OXFORD MSA

LENDING TEST

First Bank demonstrated satisfactory performance under the Lending Test within the assessment area. The bank's reasonable Geographic Distribution and Borrower Profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's reasonable small business and home mortgage performance supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank did not originate any small business loans in the low-income census tract. However, demographic data reflects limited opportunities to lend based on the small percentage of businesses located in that low-income tract. Additionally, the bank's lending performance in the moderate-income census tracts is comparable to demographic data.

Geographic Distribution of Small Business Loans Anniston-Oxford MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	4.3	0	0.0	0	0.0
Moderate	20.5	5	17.9	630	14.6
Middle	47.1	9	32.1	853	19.8
Upper	26.5	14	50.0	2,821	65.5
NA	1.5	0	0.0	0	0.0
Total	100.0	28	100.0	4,304	100.0

Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Although the bank did not originate any home mortgage loans in the low-income census tract for all three years reviewed, the lending opportunities were limited based on the small percentage of owner-occupied housing units in that tract. For the moderate-income census tracts, the bank's performance was below the demographic data and aggregate performance in 2024, but it was comparable or exceeded demographic data and aggregate performance in 2022 and 2023, respectively. Given the bank's overall performance, the geographic distribution of home mortgage loans is reasonable. See the following table for details.

Geographic Distribution of Home Mortgage Loans Anniston-Oxford MSA						
Tract Income Level	% of Owner-Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	3.9	1.8	0	0.0	0	0.0
2023	3.9	1.6	0	0.0	0	0.0
2024	3.9	2.3	0	0.0	0	0.0
Moderate						
2022	18.6	13.7	3	16.7	135	4.8
2023	18.6	17.0	5	38.5	1,501	72.7
2024	18.6	15.9	2	11.8	121	4.1
Middle						
2022	44.9	48.4	10	55.6	2,060	73.1
2023	44.9	49.1	6	46.2	373	18.1
2024	44.9	49.3	5	29.4	447	15.1
Upper						
2022	30.4	35.8	5	27.8	625	22.2
2023	30.4	31.9	2	15.4	192	9.3
2024	30.4	31.9	10	58.8	2,398	80.9
NA						
2022	2.1	0.4	0	0.0	0	0.0
2023	2.1	0.3	0	0.0	0	0.0
2024	2.1	0.5	0	0.0	0	0.0
Total						
2022	100.0	100.0	18	100.0	2,820	100.0
2023	100.0	100.0	13	100.0	2,066	100.0
2024	100.0	100.0	17	100.0	2,966	100.0
<i>Source: 2020 Census; Bank Data; 2022, 2023, and 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>						

Borrower Profile

Overall, the distribution of borrowers reflects reasonable penetration within the assessment area. Although the home mortgage lending performance was poor, the bank's small business lending performance was reasonable, which received the most weight when determining conclusions.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. The bank's lending performance to businesses with revenues of \$1.0 million or less was commensurate with the percentage of assessment area businesses in this revenue category. The following table illustrates the distribution of loans by business revenue level.

Distribution of Small Business Loans by Gross Annual Revenue Category Anniston-Oxford MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	58.6	8	50.0	2,280	70.5
\$100,000 - \$249,999	17.2	2	12.5	111	3.4
\$250,000 - \$499,999	4.9	2	12.5	31	1.0
\$500,000 - \$1,000,000	3.1	0	0.0	0	0.0
Subtotal <= \$1,000,000	83.7	12	75.0	2,422	74.9
>\$1,000,000	3.3	4	25.0	810	25.1
Revenue Not Available	13.0	0	0.0	0	0.0
Total	100.0	16	100.0	3,232	100.0
<i>Source: 2024 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among individuals of different income levels. As illustrated in the following table, the bank originated one home mortgage loan to a low-income borrower for all three years reviewed, which is below aggregate data. It is also noted that 10.7 percent of the low-income families have incomes below the poverty level, which decreases the number of low-income families that qualify for conventional home mortgages. However, the bank only originated one home mortgage loan to a moderate-income borrower in 2022 and 2023, and it did not originate any home mortgage loans to moderate-income borrowers in 2024, which is below both the percentage of families and aggregate data.

Distribution of Home Mortgage Loans by Borrower Income Level Anniston-Oxford MSA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	22.6	10.4	1	5.6	85	3.0
2023	22.6	13.6	1	7.7	20	1.0
2024	22.6	8.1	1	5.9	48	1.6
Moderate						
2022	19.7	24.0	1	5.6	105	3.7
2023	19.7	22.1	1	7.7	69	3.3
2024	19.7	21.4	0	0.0	0	0.0
Middle						
2022	18.1	21.2	4	22.2	350	12.4
2023	18.1	21.1	1	7.7	80	3.9
2024	18.1	22.6	2	11.8	270	9.1
Upper						
2022	39.5	23.7	8	44.4	670	23.8
2023	39.5	21.3	3	23.1	164	7.9
2024	39.5	22.5	8	47.1	1,435	48.4
NA						
2022	0.0	20.8	4	22.2	1,610	57.1
2023	0.0	21.9	7	53.9	1,733	83.9
2024	0.0	25.4	6	35.3	1,213	40.9
Total						
2022	100.0	100.0	18	100.0	2,820	100.0
2023	100.0	100.0	13	100.0	2,066	100.0
2024	100.0	100.0	17	100.0	2,966	100.0
<i>Source: 2020 Census; Bank Data; 2022, 2023, and 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>						

COMMUNITY DEVELOPMENT TEST

First Bank’s community development performance demonstrates adequate responsiveness to community development needs in the assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the assessment area.

Community Development Loans

First Bank originated three community development loans totaling \$236,000 in the assessment area during the evaluation period. All three loans were for the purpose of providing community services within the assessment area..

Qualified Investments

First Bank provided 41 qualified investments, which included donations totaling \$7.2 million in the Anniston-Oxford MSA Assessment Area. This level of investments represents 14.5 percent by number, and 36.4 percent by dollar volume of bank-wide qualified investments. Below are examples of qualified investments.

- Four investments totaling \$5.5 million refinanced outstanding debt used for capital improvements to stabilize or revitalize a city that includes three moderate-income census tracts located within this assessment area.
- Throughout the review period, the bank provided two donations in 2022 and 2024 totaling \$44,000 to sponsor performing arts activities, events, and education for students attending schools where a majority of the students were eligible for free or reduced-price lunch.
- Donations were made to various non-profit organizations that provide low- and moderate-income individuals/families with transitional housing, affordable housing, or eye care treatment and glasses.

Community Development Services

During the evaluation period, bank representatives provided seven community development services to organizations that supported community services and economic development. This level of community development services in the assessment area reflects an increase since the previous evaluation, in which the bank provided two community development services. The following is a description of the community development services in the assessment area.

- An employee served as the Vice Chair of Business Development for an organization that provides support to various businesses in the assessment area.
- An employee helped promote small business development by hosting financial literacy workshops and classes to aspiring small business owners.
- An employee served as a Board member for a non-profit organization that serves children of low- and moderate-income individuals and families.

CHILTON COUNTY – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN CHILTON COUNTY

The Chilton County Assessment Area consists of Chilton County in its entirety and is part of the Birmingham-Hoover MSA. The bank operates one full-service branch in the assessment area.

Economic and Demographic Data

According to the 2020 U.S. Census Data, the assessment area includes six moderate-income census tracts, and six middle-income census tracts. The following table outlines select demographic characteristics of the assessment area based on the 2020 U.S. Census data and the 2024 D&B data.

Demographic Information of the Chilton County Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	12	0.0	50.0	50.0	0.0	0.0
Population by Geography	45,014	0.0	50.3	49.7	0.0	0.0
Housing Units by Geography	19,897	0.0	49.2	50.8	0.0	0.0
Owner-Occupied Units by Geography	12,878	0.0	48.5	51.5	0.0	0.0
Occupied Rental Units by Geography	4,262	0.0	57.7	42.3	0.0	0.0
Vacant Units by Geography	2,757	0.0	38.9	61.1	0.0	0.0
Businesses by Geography	2,729	0.0	53.7	46.3	0.0	0.0
Farms by Geography	112	0.0	58.9	41.1	0.0	0.0
Family Distribution by Income Level	12,047	28.3	21.8	20.9	29.0	0.0
Household Distribution by Income Level	17,140	31.0	15.8	18.6	34.6	0.0
Median Family Income MSA - 13820 Birmingham, Alabama MSA		\$74,058	Median Housing Value		\$ 114,470	
			Median Gross Rent		\$690	
			Families Below Poverty Level		13.3%	
<i>Source: 2020 Census and 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The assessment area’s largest industries are non-classifiable establishments at 16.9 percent, followed by construction at 13.5 percent, other services (except Public Administration) at 11.1 percent, retail trade at 9.4 percent, and administrative support and waste management/services at 7.2 percent. According to Moody’s Economy.com, Inc., Précis Metro (Moody’s), dated November 16, 2025, the Chilton County Assessment Area’s largest employers include the following: University of Alabama Birmingham, Children’s of Alabama, UAB St. Vincent’s, Alabama Power Co., and Blue Cross and Blue Shield of Alabama.

In addition, Moody’s noted that the economy in the Chilton County Assessment Area has slowed down recently due to little to no job growth in most sectors. However, the area remains stable thanks to its two strongest industries: healthcare and insurance. Major employers like UAB and Blue Cross Blue Shield continue to support the local economy, driven by an aging population that requires their services. While the housing market remains steady, the area faces long-term challenges due to weak population growth, which limits its ability to expand quickly as the rest of the South.

Examiners used the FFIEC-updated MFI figures to analyze home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income MFI categories for the Chilton County Assessment Area.

Estimated Median Family Income Ranges					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2022	\$ 83,300	< \$41,650	\$41,650 to < \$66,640	\$66,640 to < \$99,960	≥ \$ 99,960
2023	\$ 89,600	< \$44,800	\$44,800 to < \$71,680	\$71,680 to < \$107,520	≥ \$107,520
2024	\$ 90,900	< \$45,450	\$45,450 to < \$72,720	\$72,720 to < \$109,080	≥ \$109,080
<i>Source: FFIEC</i>					

Competition

The market for competitive financial services within the assessment area is highly competitive. According to FDIC Deposit Market Share data as of June 30, 2025, six financial institutions operated ten offices within the assessment area. First Bank ranked fifth, holding 4.5 percent of total deposits. The remaining institutions include River Bank & Trust, Regions Bank, Marion Community Bank, Truist Bank, and Woodforest National Bank, accounting for a combined 95.5 percent of deposits, reflecting a market dominated by a small number of larger or more firmly established competitors.

There is a moderate level of competition for small business loans within the assessment area. First Bank is not required to collect small business data; therefore, the Lending Test analysis does not include a comparison to aggregate performance. However, the 2024 aggregate data show that 56 lenders reported 667 small business loans originated or purchased within the assessment area. The top three lenders, by number of loans, include American Express National Bank, River Bank & Trust, and Synchrony Bank, accounting for 43.0 percent of all reported small business lending.

In addition, significant competition exists in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to the 2024 Peer Mortgage Data, 144 institutions reported 1,073 originated and purchased residential mortgage loans in the assessment area. By number of loans, First Bank ranked 61st, holding a 0.3 percent market share, indicating a very small presence relative to the overall market. The top three lenders by number of loans, included Hamilton Mortgage Corporation, 21st Mortgage Corporation, and River Bank & Trust, which collectively accounted for 21.2 percent of all reported mortgage loans.

Community Contact

Examiners conducted a community contact with a representative from a non-profit economic development organization that provides financial and technical assistance to small businesses in the area. The contact noted a limited availability of affordable housing and small dollar loans for low- and moderate-income individuals as well as difficulty for small business owners to obtain working capital. As a result, the contact identified a significant need for affordable housing and small dollar loans for low- and moderate-income individuals, and small business loans.

Credit and Community Development Needs and Opportunities

Based on demographic information and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. The number of low- and moderate-income families, at 28.3 percent and 21.8 percent, respectively, indicates a need and opportunity to provide affordable housing. Additionally, a need and opportunity exist for small business loans considering the assessment area includes 2,729 businesses, of which 53.7 percent are in low- and moderate-income areas, and 88.9 percent have gross annual revenues of \$1 million or less. The community contact further supported the need and opportunity to finance affordable housing and small business loans.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHILTON COUNTY

LENDING TEST

Due to the insufficient volume of small business and home mortgage loans originated during the review period, the bank's performance is considered poor. However, the bank's lending performance within the Chilton County Assessment Area received limited weight for the Lending Test.

Geographic Distribution

The geographic distribution of loans is poor due to the overall low level of small business and home mortgage lending within the assessment area.

Small Business Loans

The bank originated two small business loans in 2024 within the Chilton County Assessment Area, and neither were originated in the moderate-income census tracts. Given the nominal level of small business lending during the review period, the performance is poor.

Home Mortgage Loans

The bank originated one home mortgage loan in 2022, one home mortgage loan in 2023, and three home mortgage loans in 2024 within the Chilton County Assessment Area. None of the loans originated were in the moderate-income census tracts. Given the nominal level of home mortgage lending during the review period, the performance is poor.

Borrower Profile

Due to the low volume of small business and home mortgage loans within the assessment area, the bank's Borrower Profile performance is poor.

Small Business Loans

Due to the limited number of small business loans originated within the assessment area, the bank's performance is poor. Specifically, one of two small business loans totaling \$412,000 was originated to a business with revenues of \$1.0 million or less.

Home Mortgage Loans

As previously mentioned, the bank originated one home mortgage loan in 2022, one home mortgage loan in 2023, and three home mortgage loans in 2024 within the Chilton County Assessment Area. None of these loans were originated to low- or moderate-income individuals. Given the nominal level of home mortgage lending during the review period, the bank's performance is poor.

COMMUNITY DEVELOPMENT TEST

First Bank's community development performance demonstrates poor responsiveness to community development needs in the assessment area. Despite having a branch located in this area and opportunities to participate in community development activities, the bank made limited investments and provided limited services.

Community Development Loans

Examiners' review of the bank's lending activity revealed no community development loans within the Chilton County Assessment Area.

Qualified Investments

First Bank provided 18 qualified investments in the Chilton County Assessment Area, which only included donations totaling \$47,000. This level of investment represents 6.4 percent by number, and 0.2 percent by dollar volume of bank-wide qualified investments. Below are examples of qualified investments.

- In 2022, the bank made two investments by donating a total of \$38,000 to purchase a financial literacy training program to be used in 37 local schools where majority of the students were eligible for free or reduced-price lunches.
- Annual donations were made to the chamber of commerce in 2022, 2023, and 2024 to fund projects and programs that grow communities and businesses located in the six moderate-income census tracts within the assessment area.
- Multiple donations were made to non-profit organizations that provide resources and services throughout the year to low-income individuals and areas.

Community Development Services

During the evaluation period, bank representatives provided three community development services to organizations that supported community services. The Chilton County Assessment Area was excluded from the previous evaluation. The following is a notable example of the bank's community development services in the assessment area.

- In 2022, 2023, and 2024, employees presented financial literacy classes or conducted mock job interviews at different schools where a majority of students were eligible to participate in the free- or reduced-price lunch program.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

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

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

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.