PUBLIC DISCLOSURE

May 11, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community Bank of Mississippi
Certificate Number: 8879

1905 Community Bank Way
Flowood, Mississippi 39232

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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.

PERFORMANCE LEVELS	**PERFORMANCE TESTS**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			
* *The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.*			

The Lending Test is rated High Satisfactory.

- Lending levels reflect excellent responsiveness to assessment areas' credit needs.
- A high percentage of loans are made in the institution's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs.
- The institution is a leader in making community development (CD) loans.
- The institution exhibits a good record of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices

The Investment Test is rated Low Satisfactory.

- The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits adequate responsiveness to credit and CD needs.

- The institution rarely uses innovative and/or complex investments to support CD initiatives.

The Service Test is rated High Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas.
- To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its retail delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The institution is a leader in providing CD services.

DESCRIPTION OF INSTITUTION

Community Bank of Mississippi (CBM) operates as a state-chartered retail commercial bank headquartered in Flowood, Mississippi. Community Bancshares of Mississippi, located in Brandon, Mississippi, a one-bank holding company, wholly owns CBM as well as additional subsidiaries and affiliates that provide investment and financial services. However, this evaluation does not consider any affiliate or subsidiary activities. The bank received a "Satisfactory" rating at its previous FDIC CRA Evaluation dated February 28, 2023, using Large Bank CRA Procedures.

The bank operates 55 full-service branches and 4 limited-service branches located throughout Alabama, Florida, Mississippi, and Tennessee. CBM opened one branch in Alabama (Gulf Shores) and three branches in Mississippi (Laurel, Flowood, and Starkville) during the evaluation period.

CBM offers a wide array of standard loan products to consumers and businesses, primarily focusing on home mortgage and commercial lending. CBM offers a full line of standard checking and savings deposit account products to consumers and businesses as well as various alternative delivery systems including mobile deposits, e-statements, telephone banking, mobile banking, and ATMs. It also offers hours and days of service consistent with area and industry norms.

As of December 31, 2025, assets totaled \$5.0 billion, which included total loans and leases of \$3.3 billion. Total deposits equaled \$4.6 billion as of the same date. Since the previous evaluation, total assets increased 8.8 percent, total loans increased 27.4 percent, and total deposits increased 10.6 percent. As reflected in the following table, home mortgage loans represent the largest portion of the loan portfolio.

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	371,823	11.1
Secured by Farmland	193,690	5.8
Secured by 1-4 Family Residential Properties	1,407,658	42.1
Secured by Multifamily (5 or more) Residential Properties	106,150	3.2
Secured by Nonfarm Nonresidential Properties	897,837	26.9
Total Real Estate Loans	**2,977,158**	**89.1**
Commercial and Industrial Loans	288,141	8.6
Agricultural Production and Other Loans to Farmers	3,904	0.1
Consumer Loans	73,576	2.2
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(0)	(0.0)
Total Loans	**3,342,779**	**100.0**
Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0 percent.		

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet its assessment areas' credit needs.

DESCRIPTION OF ASSESSMENT AREAS

CBM continues to operate in four rated areas: Alabama, Florida, Mississippi, and Memphis Multi-State MSA. The bank currently maintains three assessment areas in Alabama, three assessment areas in Florida, and four assessment areas in Mississippi, and one assessment area in the Memphis Multi-State MSA. Please refer to the rated areas and individual assessment areas for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation, dated February 28, 2023, to the current evaluation dated May 11, 2026. To assess performance, examiners applied the Federal Financial Institutions Examination Council (FFIEC) Large Bank CRA Procedures, which include the Lending, Investment, and Service Tests. The appendix lists the tests' criteria. Please refer to the rated area sections for details regarding which assessment areas examiners evaluated using full-scope and limited-scope procedures.

The following table shows that CBM originated a majority of its loans, deposits, and branches in Mississippi. Consequently, examiners weighed records in Mississippi heaviest when arriving at applicable conclusions and ratings. Examiners generally weighed performance in each rated area consistent with that area's lending level as reflected in the following table.

Rated Area Breakdown of Loans, Deposits, and Branches						
Rated Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Alabama	401,217	16.5	391,216	9.0	7	12.7
Florida	312,042	12.8	392,154	9.0	6	10.9
Memphis Multi-State MSA	172,388	7.1	214,779	4.9	4	7.3
Mississippi	1,552,677	63.7	3,352,325	77.1	38	69.1
Total	**2,438,324**	**100.0**	**4,350,474**	**100.0**	**55**	**100.0**
Source: 2023-2025 HMDA Reported Data; 2023-2025 CRA Reported Data; FDIC Summary of Deposits (6/30/2025). Due to rounding, totals may not equal 100.0 percent.						

Activities Reviewed

For the Lending Test, CRA Large Bank procedures require examiners to consider a bank's reported home mortgage, small business, and small farm loans since the previous evaluation, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the assessment areas) either according to the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements:

Home Mortgage Loans

- 2023: 3,406 loans totaling $621,393,000
- 2024: 3,492 loans totaling $633,510,000
- 2025: 3,870 loans totaling $746,317,000

Small Business Loans

- 2023: 2,509 loans totaling $196,042,000
- 2024: 2,437 loans totaling $203,966,000
- 2025: 3,476 loans totaling $349,708,000

Small Farm Loans

- 2023: 171 loans totaling $18,498,000
- 2024: 227 loans totaling $23,696,000
- 2025: 325 loans totaling $42,553,000

CD Loans:
March 1, 2023 – May 11, 2026: 185 loans totaling $211,589,000

Based on an analysis of the prior data, small farm loans account for only 2.8 percent of the bank's total reportable loans in 2024, and examiners determined that they do not represent a major loan product line for any assessment area. Therefore, examiners did not analyze small farm loans.

Since no trends exist between the different years' data that materially affect applicable conclusions or ratings, this evaluation only presents loan data for 2024, the most recent year for which aggregate data exists as of this evaluation date. However, examiners included all years of reviewed loan data in the Assessment Area Concentration discussion. The applicable aggregate data served as the primary standard of comparison. Refer to each rated area section for a discussion on loan product weighting.

The scope for the Investment and Service Tests consider applicable current period CD activities, including qualified investments and CD services from the period from the prior evaluation to the current evaluation's date and. The Investment Test's scope further encompasses all prior period qualified investments, which include those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period qualified investments.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings/closings during the evaluation period. The review evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

CBM demonstrated a high satisfactory record for the Lending Test. A high percentage of loans made in the assessment areas, adequate borrower profile and geographic distribution, extensive use of innovative and flexible lending practices, excellent lending levels, and a leader level of CD loans support this conclusion. Conclusions regarding the Lending Test performance were consistent in Mississippi and the Memphis Multi-State MSA and inconsistent in Alabama and Florida, falling below the level noted for the institution overall.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. Excellent records regarding home mortgage and small business loans support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the assessment areas' credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs. For 2024, the bank originated 3,071 total reportable home mortgage loans totaling approximately $546.2 million inside its assessment areas. CBM captured a 2.5 percent market share of the total number and a 1.7 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 9th out of 1,147 total lenders in the bank's assessment areas. This ranking lands the bank in the top 0.8 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to assessment area credit needs. For 2024, the bank originated 2,058 total reportable small business loans totaling nearly $177.5 million

inside its assessment areas. CBM captured a 1.8 percent market share of the total number and a 3.5 percent market share of the total dollar volume of small business loans. This volume of activity ranks the bank 11th out of 223 total lenders in the bank's assessment areas. This ranking lands the bank in the top 4.9 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Assessment Area Concentration

A high percentage of loans are made in the institution's assessment areas. As seen in the following table, high percentages of home mortgage and small business loans, by number and dollar volume, originated in the assessment areas support this conclusion.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans					Dollar Amount of Loans $(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage										
2023	2,979	87.5	427	12.5	3,406	544,662	87.7	76,731	12.3	621,393
2024	3,071	87.9	421	12.1	3,492	546,184	86.2	87,326	13.8	633,510
2025	3,347	86.5	523	13.5	3,870	635,277	85.1	111,040	14.9	746,317
Subtotal	**9,397**	**87.3**	**1,371**	**12.7**	**10,768**	**1,726,123**	**86.3**	**275,097**	**13.7**	**2,001,220**
Small Business										
2023	2,132	85.0	377	15.0	2,509	171,136	87.3	24,906	12.7	196,042
2024	2,058	84.4	379	15.6	2,437	177,533	87.0	26,433	13.0	203,966
2025	2,950	84.9	526	15.1	3,476	306,576	87.7	43,132	12.3	349,708
Subtotal	**7,140**	**84.8**	**1,282**	**15.2**	**8,422**	**655,245**	**87.4**	**94,471**	**12.6**	**749,716**
Total	**16,537**	**86.2**	**2,653**	**13.8**	**19,190**	**2,381,368**	**86.6**	**369,568**	**13.4**	**2,750,936**
Source: HMDA Repotted Data; CRA Reported Data. Due to rounding, totals may not equal 100.0 percent.										

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Performance in Alabama, Memphis Multi-State MSA, and Mississippi proved consistent, while performance in Florida proved inconsistent, falling below the overall conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at conclusions. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts in the assessment areas when arriving at conclusions for this performance factor. Refer to the rated area and assessment area sections for a complete discussion of the geographic distribution.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Performance in Florida, Memphis Multi-State MSA, and Mississippi proved consistent with the overall conclusion. Performance in Alabama proved inconsistent, falling below the overall conclusion. Examiners considered the loan product types relative to the available comparative data and any performance context issues when arriving at conclusions. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses with gross annual revenue of $1 million or less when arriving at conclusions for this performance factor. Refer to the rated area and assessment area sections for a complete discussion of the borrower profile.

Innovative or Flexible Lending Practices

The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion. The following table shows that since the previous evaluation, CBM originated 2,940 innovative or flexible loans totaling $560.1 million. This dollar figure equates 11.6 percent of average total assets of $4.8 billion since the previous evaluation and 18.8 percent of average net loans of $3.0 billion for the same period.

Innovative or Flexible Lending Programs										
Type of Program	**2023***		**2024**		**2025**		**YTD 2026**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
FMCC/FNMA	379	94,909	429	107,978	608	119,290	175	49,447	**1,591**	**371,624**
USDA/FHA/VA	176	44,013	212	51,814	170	42,230	61	15,689	**619**	**153,746**
SBA	29	12,348	22	7,795	26	8,027	5	2,394	**82**	**30,564**
Community Home Improvement Loans	136	974	197	1,250	137	567	14	64	**484**	**2,855**
Mississippi Home Corp	41	283	65	521	44	363	14	109	**164**	**1,276**
Totals	**761**	**152,527**	**925**	**169,358**	**985**	**170,477**	**269**	**67,703**	**2,940**	**560,065**
*Source: Bank Data. *Since prior evaluation.*										

The following lists details regarding the innovative and/or flexible lending programs offered institution-wide across all assessment areas.

FMCC/FNMA (Fannie Mae & Freddie Mac) – Loans offered through these enterprises allow the bank to extend fixed-rate, fully amortizing, conventionally underwritten credit to borrowers who would not qualify under standard guidelines, those with limited down payment funds, elevated LTVs, nontraditional credit histories, or non-traditional household income, rather than declining the request or steering the borrower to a higher-cost alternative.

Government Loan Programs – Through its secondary market mortgage program, CBM offers home loans with additional flexibility and attractive terms to eligible community borrowers through the availability of FHA, USDA Rural Housing, and VA government programs. CBM also offers commercial loans through SBA programs to serve the credit needs of businesses in its assessment areas.

Community Home Improvement Loans – This product is offered to low- and moderate-income individuals to obtain small dollar mortgage loans used to improve owner-occupied homes with reduced closing costs and below market interest rates.

Mississippi Home Corp - Community Bank participates in several down payment and mortgage assistance programs that pair competitively priced 30-year fixed-rate first mortgages with deferred second mortgages and grants covering down payment and closing costs. All programs require completion of HUD-approved homebuyer education prior to closing, which supports sustainable homeownership and reduces default risk.

Community Development Loans

The institution is a leader in making CD loans. The bank demonstrated inconsistent performance in all rated areas, where performances fell below the institution's overall level. The following tables show that since the previous evaluation, CBM originated 185 CD loans totaling approximately $211.6 million. This level equates to 4.4 percent of average total assets of $4.8 billion since the previous evaluation and 7.1 percent of average net loans of $3.0 billion for the same period. These levels reflect decreases from the 8.1 percent of average total assets and 13.6 percent of average net loans reported at the previous evaluation.

Community Development Lending
Institution

Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
2023*	20	15,033	0	0	17	33,577	7	18,246	**44**	**66,856**
2024	29	20,108	1	190	11	26,020	12	17,503	**53**	**63,821**
2025	54	11,807	0	0	17	46,873	13	17,938	**84**	**76,618**
YTD 2026	1	176	0	0	1	1,818	2	2,300	**4**	**4,294**
Total	**104**	**47,124**	**1**	**190**	**46**	**108,288**	**34**	**55,987**	**185**	**211,589**

*Source: Bank Data. *Since prior evaluation.*

Community Development Loans By Rated Area
Institution

Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Alabama	10	11,370	1	190	5	27,231	3	6,006	**19**	**44,797**
Florida	11	12,513	0	0	1	1,069	2	3,636	**14**	**17,218**
Memphis Multi-State MSA	50	8,395	0	0	4	8,284	1	4,610	**55**	**21,289**
Mississippi	33	14,846	0	0	36	71,704	28	41,735	**97**	**128,285**
Total	**104**	**47,124**	**1**	**190**	**46**	**108,288**	**34**	**55,987**	**185**	**211,589**

Source: Bank Data.

The CD loans reflect good responsiveness to the assessment areas' CD needs. As seen in the previous table, a majority of the dollar volume of all CD loans promoted economic development. However, the institution also provided a notable level of activity in two of the three remaining categories, further demonstrating good responsiveness to a variety of CD needs.

INVESTMENT TEST

The institution demonstrated a low satisfactory record for the Investment Test. The adequate level of qualified investments and adequate responsiveness to CD needs support this conclusion. Conclusions regarding all four rated areas proved consistent with the institution's overall performance.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. As seen in the following table, CBM made use of 679 qualified investments totaling \$50.8 million. The total dollar amount equates to 1.0 percent of average total assets of \$4.8 billion since the previous evaluation and 4.1 percent of average securities of \$1.3 billion for the same period. The bank's level of qualified investments compare favorably to similarly situated institutions and reflect a slight increase from the 0.7 percent of average total assets and 2.8 percent of average securities reported in the previous evaluation.

Qualified Investments by Rated Area Institution										
Rated Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Alabama	10	4,913	41	62	1	200	3	518	**55**	**5,693**
Florida	24	3,382	55	2,460	3	250	4	275	**86**	**6,367**
Memphis Multi-State MSA	4	1,983	12	<1	1	247	2	407	**19**	**2,637**
Mississippi	104	15,406	363	832	5	2,451	47	17,451	**519**	**36,140**
Total	**142**	**25,684**	**471**	**3,354**	**10**	**3,148**	**56**	**18,651**	**679**	**50,837**
Source: Bank Data.										

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to credit and CD needs. CBM utilized qualified investments that showed responsiveness to a variety of CD needs as illustrated by activity in all four CD purpose categories.

Community Development Initiatives

CBM rarely uses innovative and/or complex investments to support CD initiatives. Refer to the State of Florida section for details.

SERVICE TEST

CBM demonstrated a high satisfactory record for the Service Test. The leader level of CD services and changes in branch locations combined with adequate records regarding accessibility of delivery systems and reasonableness of business hours and services support this conclusion. The Service Test performance in all rated areas is consistent with the overall conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas. As seen in the following table, CBM's level of branches in low-income census tracts rises 5.1 percentage points above the population in these tracts, reflecting an adequate level. The bank's level of branches in moderate-income census tracts is similar to the population percentage in these tracts, also reflecting an adequate level.

Branch and ATM Distribution by Geography Income Level
Institution

Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	129	9.6	335,032	6.9	1	1.8	1	1.9	0	0.0	0	0.0
Moderate	310	23.1	1,039,644	21.3	12	21.8	11	20.8	1	25.0	0	0.0
Middle	453	33.7	1,758,354	35.9	24	43.6	24	45.3	1	25.0	0	0.0
Upper	408	30.3	1,711,227	35.0	17	30.9	16	30.2	2	50.0	0	0.0
NA	45	3.4	49,031	1.0	1	1.8	1	1.9	0	0.0	0	0.0
Totals	**1,345**	**100.0**	**4,893,288**	**100.0**	**55**	**100.0**	**53**	**100.0**	**4**	**100.0**	**0**	**100.0**

Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.

The preceding table shows that the bank's level ATMs in low-income census tracts falls 5.0 percentage points below the population in these tracts, thereby reflecting an adequate level. The bank's level of ATMs in moderate-income census tracts is similar to the population in these tracts, also reflecting an adequate level.

CBM also offers the following alternative delivery systems and services for delivering retail banking services to all users, including within low- or moderate-income geographies and/or to low- or moderate-income individuals throughout all assessment areas across every rated area.

- **Telephone Banking** – This system allows customers to obtain deposit account information, transfer funds between accounts, reorder checks, and perform other banking services through a bank staff member.

- **Online Banking** – This service allows customers to conduct banking transactions through a personal computer. Allowable transactions include viewing account information, viewing online statements, viewing cleared checks, fund transfers, electronic bill payment, and new account opening. The online banking system has proven effective in reaching customers. CBM reported over 55,293 online banking accounts. Through online banking, CBM also allows the ability to open deposit accounts and apply for a mortgage loan.

- **Text Banking** – This service allows customers to check their available balance before making a purchase and receive notifications of primary account balance as well as low balance alerts below a designated level.

- **Mobile App Banking (CB2GO)** – This product allows customers to access their accounts at anytime and anywhere with a web-enabled phone. Features include remote deposit, viewing account information, electronic bill payment, push notification alerts, receiving secure messages, and money budgeting tools. CBM reported nearly 25,000 installs for smartphones. Customers may also monitor and control their debit card with alerts, which allows customers to stay in touch with their spending and helps to potentially detect and prevent fraud.

- **My Money –** CBM offers customers a free personal financial management tool that can be accessed through the mobile banking application. MyMoney allows customers to add all of their financial accounts in one place to include accounts outside of CBM.

- **Digital Wallet** – CBM offers digital wallet services from all major providers. Customers can link their CBM accounts and cards to the wallet services for convenience of payment. Additionally, the wallet allows customers to send and receive money from friends and family.

- **Remote Deposit Capture** – This fully integrated, web-based electronic payment processing system allows retail customers to capture check images and deposit the checks remotely through a smartphone device and for commercial customers they can use a check scanner to convert checks into electronic transactions.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. CBM opened 4 branches, one of which is located in a moderate-income census tract, since the previous evaluation. There were no branch closings during the review period.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The bank's branches generally have the same product offerings and services, and branch locations have similar hours that vary only slightly based on the specific areas' needs.

CBM's branches maintain reasonable hours relative to the areas served and the industry. The bank's branches maintain lobbies operating between 7 to 8 hours Monday through Thursday with slightly extended hours on Friday, with most branches also operating drive-thru hours.

Community Development Services

The institution is a leader in providing community development services. The following tables shows that CBM provided 1,548 CD services since the previous evaluation. The current level reflects a significant increase from the 479 CD services recorded at the prior evaluation.

Community Development Services by Year Institution					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2023*	46	334	2	13	**395**
2024	35	461	1	31	**528**
2025	8	469	3	46	**526**
YTD 2026	0	99	0	0	**99**
Total	**89**	**1,363**	**6**	**90**	**1,548**
*Source: Bank Data. *Since prior evaluation.*					

Community Development Services by Rated Area Institution					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Alabama	6	230	0	0	**236**
Florida	13	211	4	4	**232**
Memphis Multi-State MSA	6	90	0	0	**96**
Mississippi	64	832	2	86	**984**
Total	**89**	**1,363**	**6**	**90**	**1,548**
Source: Bank Data.					

The CD services demonstrate excellent responsiveness and high qualitative impact in helping improve finances for unbanked and underbanked individuals and businesses. CBM provides financial literacy programs tying banking products to the content of the education program. Participants may be eligible to apply for banking products, some with flexible underwriting to help qualify, after attending some seminars. CBM also provides technical assistance and processes grant applications through four different grant programs to provide disaster repair and rehabilitation, down payment, closing cost, or matching funds assistance to individuals and organizations.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

STATE OF ALABAMA

CRA RATING FOR ALABAMA: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA.

CBM designated three assessment areas in the State of Alabama as noted in the following table. All of the bank's assessment areas in Alabama conform to technical CRA regulatory requirements.

Description Assessment Areas State of Alabama			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Birmingham MSA	Jefferson and Shelby	244	2
Mobile MSA	Mobile	135	2
Daphne MSA	Baldwin	44	3
Source: Bank Data; 2020 U.S. Census Data.			

SCOPE OF EVALUATION – ALABAMA

Examiners considered the following loans granted inside the bank's Alabama assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:
- 2023: 350 loans totaling $94,974,000
- 2024: 393 loans totaling $98,573,000
- 2025: 447 loans totaling $746,317,000

Small Business Loans:
- 2023: 107 loans totaling $15,197,000
- 2024: 118 loans totaling $19,395,000
- 2025: 197 loans totaling $36,829,000

As suggested by the above figures, examiners afforded more weight to home mortgage loans when arriving at applicable conclusions for this rated area given the larger volume of loans.

The following table shows that the Daphne MSA assessment area generated the largest percentage of the bank's Alabama loans. Consequently, examiners applied full-scope procedures to this assessment area since it has not previously received full-scope review and afforded the most weight to this assessment area when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the other two Alabama assessment areas and generally weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Alabama						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Birmingham MSA	115,949	28.9	132,995	34.0	2	28.6
Daphne MSA	181,304	45.2	149,731	27.7	3	42.9
Mobile MSA	103,964	25.9	108,490	38.3	2	28.6
Total	**401,217**	**100.0**	**391,216**	**100.0**	**7**	**100.0**
Source: 2023-2025 HMDA Reported Data; 2023-2025 CRA Reported Data; FDIC Summary of Deposits (6/30/2025). Due to rounding, totals may not equal 100.0 percent.						

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Refer to the institution-level Scope of Evaluation section for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

CBM demonstrated a low satisfactory record in the State of Alabama regarding the Lending Test. An adequate record regarding geographic distribution, a relatively high level of CD loans, good lending levels, and a poor borrower profile support this conclusion. Conclusions in the Daphne and Mobile MSA assessment areas proved consistent, while performance in the Birmingham MSA assessment area rose above the institution's performance in the State of Alabama.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the State of Alabama. Good performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to assessment area credit needs in the State of Alabama. For 2024, the bank originated 393 total reportable home mortgage loans totaling approximately $98.6 million in its Alabama assessment areas. CBM captured a 1.0 percent market share of the total number of home mortgage loans and 0.9 percent market share of the total dollar volume of home mortgage loans in the Alabama assessment areas. This volume of activity ranks the bank 88th out of 576 total lenders in the bank's Alabama assessment areas. This ranking lands the bank in the top 15.3 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the State of Alabama. For 2024, the bank originated 118 total reportable small business loans totaling approximately $19.4 million inside its Alabama assessment areas. CBM captured a 0.3 percent market share, by both number and dollar volume, of small business loans. This volume of activity ranks the bank 38th out of 142 total lenders in the bank's Alabama assessment areas. This ranking lands the bank in the top 36.7 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the State of Alabama assessment areas. The Daphne MSA assessment area demonstrated inconsistent performance, falling below performance at the rated area, and the Mobile MSA assessment area also demonstrated inconsistent performance, rising above performance noted for the rated area. The Birmingham MSA assessment area demonstrated consistent performance.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different sizes. The Daphne MSA assessment area demonstrated inconsistent performance, rising above the rated area's level. Performance in the Birmingham MSA and Mobile MSA assessments areas demonstrated consistent performance with the rated area.

Community Development Loans

The institution has made a relatively level of CD loans in the State of Alabama. Its fair share contribution, by dollar volume, to the institution's overall leader level supports this conclusion. Performance in the Birmingham MSA assessment area demonstrated inconsistent performance, rising above the rated area level. Performance in the Daphne MSA and Mobile MSA assessment areas also demonstrated inconsistent performance, falling below the rated area level.

The following table shows that since the previous evaluation, the bank originated 19 CD loans totaling approximately $44.8 million in this state. The dollar amount equates to 21.2 percent of the bank's total CD loans compared to this rated area containing 16.5 percent of total loans. The current level reflects a notable decline from the 31 CD loans totaling $91.2 million in this rated area at the prior evaluation. However, the current level continues to reflect good performance. The CD loans also exhibit good responsiveness to the state's CD needs as reflected by activities within all CD purpose categories.

Community Development Loans State of Alabama										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Birmingham MSA	8	11,060	0	0	5	27,231	0	0	**13**	**38,291**
Daphne MSA	2	310	0	0	0	0	2	2,421	**4**	**2,731**
Mobile MSA	0	0	1	190	0	0	1	3,585	**2**	**3,775**
Total	**10**	**11,370**	**1**	**190**	**5**	**27,231**	**3**	**6,006**	**19**	**44,797**
Source: Bank Data.										

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the State of Alabama regarding the Investment Test. The adequate level of qualified CD investments and grants and adequate responsiveness to CD needs support this conclusion. All three assessment areas reflect consistent performance with the rated area.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the State of Alabama. The following table shows that CBM made 55 qualified investments totaling approximately $5.7 million in the State of Alabama. By dollar volume, this equates to 11.2 percent of the bank's total adequate level of qualified investments compared to 9.0 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area State of Alabama										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Birmingham MSA	5	858	11	10	1	200	1	200	**18**	**1,268**
Daphne MSA	2	1,594	15	40	0	0	2	318	**19**	**1,952**
Mobile MSA	3	2,461	15	12	0	0	0	0	**18**	**2,473**
Total	**10**	**4,913**	**41**	**62**	**1**	**200**	**3**	**518**	**55**	**5,693**
Source: Bank Data.										

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to credit and CD needs in the State of Alabama. The prior table shows most qualified investments supported affordable housing initiatives.

Community Development Initiatives

CBM does not use innovative and/or complex investments to support CD initiatives in the State of Alabama.

SERVICE TEST

CBM demonstrated a high satisfactory record for the State of Alabama regarding the Service Test. A leader level of CD services combined with adequate records regarding accessibility of delivery systems, reasonableness of hours and services, and changes in branch locations support this conclusion. The Birmingham MSA and Mobile MSA assessment areas reflect consistent performance with the rated area level. The Daphne MSA assessment area reflects inconsistent performance, falling below the rated area level.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas in the State of Alabama. The State of Alabama reflects a consistent conclusion with the institution overall. As seen in the following table, although CBM does not operate any branches or ATMs in low-income census tracts, this falls only 4.9 percentage points below the population in these tracts, reflecting an adequate level. The bank's level of branches and ATMs in moderate-income census tracts trails the population percentage in these tracts by 6.7 percentage points, also reflecting an adequate level. Examiners also noted that many of the bank's branches and ATMs are in close proximity to low-income census tracts, thus somewhat enhancing access to banking services in these areas.

Branch and ATM Distribution by Geography Income Level State of Alabama														
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Open Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	33	7.8	76,324	4.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	109	25.8	324,427	21.0	1	14.3	1	14.3	0	0.0	0	0.0
Middle	146	34.5	589,091	38.2	3	42.9	3	42.9	1	100.0	0	0.0
Upper	123	29.1	535,914	34.7	3	42.9	3	42.9	0	0.0	0	0.0
NA	12	2.8	18,565	1.2	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**423**	**100.0**	**1,544,321**	**100.0**	**7**	**100.0**	**7**	**100.0**	**1**	**100.0**	**0**	**100.0**
Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.												

Alternative delivery systems offered in the State of Alabama remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals in the State of Alabama. One branch opened in a middle-income census tract, and no branches closed since the prior evaluation in the State of Alabama.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies and/or individuals. The State of Alabama reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the State of Alabama. The following table shows that CBM provided 236 CD services in the State of Alabama since the previous evaluation. The current level represents 15.2 percent of the bank's total leader level of CD services compared to this state containing 12.7 percent of the bank's total branches. This figure reflects a significant increase from the 35 CD services at the prior evaluation. The CD services also reflect good responsiveness toward addressing an identified need of providing community services targeted to low- and moderate-income individuals.

Community Development Services State of Alabama					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Birmingham MSA	3	48	0	0	**51**
Daphne MSA	2	87	0	0	**89**
Mobile MSA	1	95	0	0	**96**
Total	**6**	**230**	**0**	**0**	**236**
Source: Bank Data.					

DAPHNE MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DAPHNE MSA ASSESSMENT AREA

The Daphne MSA assessment area includes all 44 census tracts in Baldwin County, the sole county that comprises the Daphne-Fairhope-Foley MSA located in southern Alabama.

Economic and Demographic Data

The assessment area's census tracts reflect the following income designations based on 2020 U.S. Census Data: 9 moderate-, 24 middle-, and 9 upper-income census tracts as well as and 2 census tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Daphne MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	44	0.0	20.5	54.6	20.5	4.6
Population by Geography	231,767	0.0	17.6	58.0	23.7	0.7
Housing Units by Geography	116,747	0.0	15.5	57.1	22.9	4.5
Owner-Occupied Units by Geography	64,716	0.0	17.4	59.4	22.5	0.7
Occupied Rental Units by Geography	19,331	0.0	22.0	58.1	18.8	1.1
Vacant Units by Geography	32,700	0.0	8.0	52.1	25.9	14.0
Businesses by Geography	24,977	0.0	14.8	58.4	25.3	1.5
Farms by Geography	349	0.0	22.6	65.0	11.5	0.9
Family Distribution by Income Level	56,092	19.6	19.1	21.1	40.2	0.0
Household Distribution by Income Level	84,047	23.2	17.8	16.8	42.2	0.0
Median Family Income MSA - 19300 Daphne-Fairhope-Foley, AL MSA		$79,907	Median Housing Value			$ 254,050
			Median Gross Rent			$992
			Families Below Poverty Level			6.3%
Source: 2020 U.S. Census Data 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 100.0 percent.						

According to Moody's Analytics, major employers in the area include Walmart, Infirmary Heath, and Collins Aerospace. According to the U.S. Bureau of Labor Statistics as of December 2025, the Daphne MSA assessment area's unemployment rate at 2.3 percent falls below the State of Alabama at 2.7 percent and the national average at 4.4 percent.

Examiners use the applicable FFIEC median family income (MFI) levels to analyze home mortgage loans under the borrower profile criterion. The following table shows the applicable income ranges based on the 2024 FFIEC-estimated MFI of $89,100 for the Daphne MSA.

Median Family Income Ranges - Daphne-Fairhope-Foley, AL MSA				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024 ($89,100)	<$44,550	$44,550 To <$71,280	$71,280 To <$106,920	>=$106,920
Source: FFIEC.				

Competition

The area contains a moderate level of competition from other chartered banks, based on its population, with 27 institutions operating 85 offices in the assessment area. CBM ranks 14th in market share by capturing 2.2 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. However, non-bank entities such as fintech companies, credit unions, mortgage companies, and finance companies heighten the competition level with many offering the remote delivery of products through digital devices. Overall, the competition level allows for lending opportunities.

Community Contact

Examiners reviewed a previously conducted community contact with an individual representing a local business trade organization to help assess the current economic conditions, community credit needs, and potential opportunities for bank involvement in the area. The contact stated that the current economy is struggling due to an aging workforce and the availability and conditions of local housing stock. Primary needs in the area include housing development, financial education for the public, and small business education. The contact noted that while local financial institutions are involved in meeting to understand challenges, additional opportunities exist for financial education and small business development.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners concluded the primary credit needs in the Daphne MSA assessment area include home mortgage and small business loans. Furthermore, the area's CD needs primarily include economic development and community services, such as financial education targeted to low- and moderate-income individuals.

CONCLUSIONS ON PERFORMANCE CRITERIA IN DAPHNE MSA ASSESSMENT AREA

LENDING TEST

CBM demonstrated a low satisfactory record in the Daphne MSA assessment area regarding the Lending Test. Adequate performance regarding borrower profile and good lending levels outweigh poor geographic distribution and a low level of CD loans to support this conclusion.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the Daphne MSA assessment area. Good performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to assessment area credit needs in the Daphne MSA assessment area. For 2024, the bank originated 156 total reportable home mortgage loans totaling approximately $42.8 million. CBM captured a 1.6 percent market share of the total number and a 1.5 percent market share of the total dollar volume of home mortgage loans. The bank's activity by number of loans ranks it 14th out of 462 total lenders in the Daphne MSA assessment area. This ranking lands the bank in the top 3.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect adequate responsiveness to assessment area credit needs in the Daphne MSA assessment area. For 2024, the bank originated 46 total reportable small business loans totaling approximately $6.7 million. CBM captured a 0.6 percent market share of the total number of loans and a 1.9 percent market share of the total dollar volume of small business loans. The bank's activity by number of loans ranks it 26th out of 97 total lenders in the Daphne MSA assessment area. This ranking lands the bank in the top 26.8 percent of lenders, considering the total number and dollar volume of loans made by each institution.

<u>Geographic Distribution</u>

The geographic distribution of loans reflects poor penetration throughout the Daphne MSA assessment area. Poor records regarding home mortgage loans and small business loans support this conclusion.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects poor penetration throughout the Daphne MSA assessment area. Poor performance in moderate-income census tracts supports this conclusion. As seen in the following table, CBM's lending in moderate-income census tracts falls below aggregate data by 10.6 percentage points, reflective of poor performance.

Geographic Distribution of Home Mortgage Loans
Daphne MSA Assessment Area

Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	$(000s)	%
Low						
2024	0.0	0.0	0	0.0	0	0.0
Moderate						
2024	17.4	15.7	8	5.1	2,271	5.3
Middle						
2024	59.4	54.0	94	60.3	24,319	56.8
Upper						
2024	22.5	27.9	47	30.1	14,415	33.7
NA						
2024	0.7	2.3	7	4.5	1,831	4.3
Total						
2024	**100.0**	**100.0**	**156**	**100.0**	**42,836**	**100.0**

Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans
The geographic distribution of small business loans reflects poor penetration throughout the Daphne MSA assessment area. Poor performance in moderate-income census tracts supports this

conclusion. As seen in the following table, CBM's lending in moderate-income census tracts trails aggregate data by 12.1 percentage points, reflective of poor performance.

Geographic Distribution of Small Business Loans Daphne MSA Assessment Area						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	0.0	0.0	0	0.0	0	0.0
Moderate						
2024	14.8	14.3	1	2.2	45	0.7
Middle						
2024	58.4	54.4	31	67.4	4,902	73.2
Upper						
2024	25.3	29.1	13	28.3	1,708	25.5
NA						
2024	1.5	2.3	1	2.2	39	0.6
Total						
2024	**100.0**	**100.0**	**46**	**100.0**	**6,694**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Daphne assessment area. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low-income borrowers trails aggregate data by 3.2 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank's lending level falls 2.4 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Daphne MSA Assessment Area						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	19.6	4.5	2	1.3	160	0.4
Moderate						
2024	19.1	13.9	18	11.5	2,525	5.9
Middle						
2024	21.1	19.1	16	10.3	2,327	5.4
Upper						
2024	40.2	40.3	88	56.4	27,208	63.5
NA						
2024	0.0	22.2	32	20.5	10,616	24.8
Total						
2024	**100.0**	**100.0**	**156**	**100.0**	**42,836**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Daphne MSA assessment area. Adequate performance to businesses with gross annual revenue of $1 million or less supports this conclusion. The following table shows CBM's lending to businesses with gross annual revenue of $1 million or less rises 6.8 percentage points above the aggregate performance, reflecting adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Daphne MSA Assessment Area						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	90.4	47.6	25	54.4	3,462	51.7
> $1,000,000						
2024	1.5	--	14	30.4	1,724	25.8
Revenue Not Available						
2024	8.1	--	7	15.2	1,508	22.5
Total						
2024	**100.0**	**100.0**	**46**	**100.0**	**6,694**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. "- - data not available." Due to rounding, totals may not equal 100.0 percent.						

Community Development Loans

The institution has made a low level of CD loans in the Daphne MSA assessment area. As noted under the rated area level, CBM originated 4 CD loans totaling $2.7 million in the Daphne MSA assessment area. By dollar volume, this equates to 6.1 percent of the bank's total CD lending in the State of Alabama as compared to the 45.2 percent of the bank's loans attributed to this assessment area. The following lists an example of a CD loan in the Daphne MSA assessment area:

- ***Revitalize and Stabilize*** – The bank originated a $1.0 million loan where funds were utilized to aid clean-up efforts after a hurricane. This funding helps to revitalize and stabilize an area where a federal disaster declaration was issued due to extensive damage.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the Daphne MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments and grants and adequate responsiveness to CD needs support this conclusion.

Investment and Grant Activity

The institution has adequate level of qualified CD investments and grants, although rarely in a leadership position particularly those that are not routinely provided by private investors in the Daphne MSA assessment area. As seen in the table for the State of Alabama, the institution made 19 qualified investments totaling approximately $2.0 million in the Daphne MSA assessment area. By dollar volume, this equates to 34.3 percent of the total qualified investments in the State of Alabama compared to 27.7 percent of the state's total deposits in this assessment area.

The following lists an example of a qualified investment in the Daphne MSA assessment area:

- ***Affordable Housing*** – The bank invested $850,000 in a bond for an 80-unit affordable housing apartment complex. This investment ensures affordable housing is available for low- and moderate-income families in a property where the rent is income restricted.

Responsiveness to Credit and Community Development Needs

CBM exhibited adequate responsiveness to credit and CD needs in the Daphne MSA assessment area. The qualified investment table for the State of Alabama shows responsiveness in the Daphne MSA assessment area in three of four CD purpose categories, with an emphasis on activities that provide affordable housing.

Community Development Initiatives

The institution does not use innovative and/or complex investments to support CD initiatives in the Daphne MSA assessment area.

SERVICE TEST

CBM demonstrated a low satisfactory record in the Daphne MSA assessment area regarding the Service Test. The reasonableness of hours and services combined with a relatively high level of CD services and limited accessibility of delivery systems support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the Daphne MSA assessment area. Performance in the Daphne MSA assessment area reflects inconsistent performance to the institution overall, falling below the institution's record. As noted in the following table, CBM does not operate any branches or ATMs in moderate-income census tracts, reflecting limited accessibility compared to 17.6 percent of the population residing in those tracts.

Branch and ATM Distribution by Geography Income Level Daphne MSA Assessment Area													
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Opened Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	20.5	40,735	17.6	0	0.0	0	0.0	0	0.0	0	0.0
Middle	24	54.6	134,398	58.0	3	100.0	3	100.0	1	100.0	0	0.0
Upper	9	20.5	54,920	23.7	0	0.0	0	0.0	0	0.0	0	0.0
NA	2	4.6	1,714	0.7	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**44**	**100.0**	**231,767**	**100.0**	**3**	**100.0**	**3**	**100.0**	**1**	**100.0**	**0**	**100.0**
Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.												

Alternative delivery systems offered in the Daphne MSA assessment area remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the Daphne MSA assessment area has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch opened in a middle-income census tract, and no branches closed in this assessment area during the review period.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the Daphne MSA assessment area, particularly low- and moderate-income geographies and/or individuals. The Daphne MSA assessment area reflects product offerings, services, and branch hours consistent with the institution as a whole.

Community Development Services

The institution provides a relatively high level of CD services in the Daphne MSA assessment area. The table in the State of Alabama section shows that the bank provided 89 CD services since the previous evaluation in the Daphne MSA assessment area. The current level represents 37.7 percent of total leader level of CD services in the State of Alabama compared to this assessment area containing 42.9 percent of the total branches. This figure reflects a significant increase from the 5 CD services in this assessment area at the prior evaluation. The following lists an example of a CD service in the Daphne MSA assessment area:

- ***Community Services*** – Employees provided six in-person financial education training sessions to individuals as part of the bank's small dollar loan program to encourage individuals to develop a regular savings plan. A significant majority of the attendees are low- or moderate-income individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Birmingham MSA	Above	Consistent	Consistent
Mobile MSA	Consistent	Consistent	Consistent

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of CBM's operations and activities. The demographic data for the limited-scope assessment areas is in the appendix.

Birmingham MSA Assessment Area

The Birmingham MSA assessment area consists of all of Jefferson and Shelby counties. CBM operates two branches in this assessment area in upper-income census tracts, although accessible to nearby low- and moderate-income census tracts. This distribution of branches and availability of alternative delivery systems proved inconsistent with the institution's overall conclusion, with performance below the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	99	31,080
Small Business Loans	23	5,854
CD Loans	13	38,291
Investments	18	1,268
CD Services	51	--
Source: Bank Data.		

Mobile MSA Assessment Area

The Mobile Non-MSA assessment area consists of all of Mobile County. CBM operates two branches in this assessment area: one in a moderate-income census tract and one in an upper-income census tract. This distribution of branches and availability of alternative delivery systems proved inconsistent with the institution's overall conclusion, with performance above the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	138	24,657
Small Business Loans	49	6,847
CD Loans	2	3,775
Investments	18	2,473
CD Services	96	--
Source: Bank Data.		

<u>Geographic Distribution</u>

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2024
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	$	% 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	
Birmingham MSA	99	31,080	41.8	23,032	4.5	9.1	2.8	18.0	21.2	14.0	32.4	22.2	32.8	44.3	46.5	50.0	0.8	1.0	0.3	
Mobile MSA	138	24,657	58.2	8,898	2.1	5.1	1.3	20.7	26.8	16.5	44.2	37.0	41.7	32.7	30.4	40.4	0.3	0.7	0.2	
Total	**237**	**55,737**	**100.0**	**31,930**	**3.8**	**6.8**	**2.4**	**18.8**	**24.5**	**14.7**	**36.0**	**30.8**	**35.3**	**40.8**	**37.1**	**47.3**	**0.7**	**0.8**	**0.3**	
Source: 2020 U.S. Census Data; 2024 HMDA Data and Aggregate Data. Due to rounding, totals may not equal 100.0.																				

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2024																			
	Total Loans to Small Businesses				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income census tracts**		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**Aggregate**
Birmingham MSA	23	5,854	31.9	21,659	6.6	4.4	6.7	16.2	13.0	11.7	29.1	17.4	26.6	47.0	65.2	54.0	1.2	0.0	1.0
Mobile MSA	49	6,847	68.1	8,841	4.1	2.0	3.8	27.0	24.5	23.1	35.1	40.8	37.1	33.6	32.7	36.0	0.2	0.0	0.1
Total	**72**	**12,701**	**100.0**	**30,500**	**5.8**	**2.8**	**5.9**	**19.3**	**20.8**	**15.0**	**30.8**	**33.3**	**29.6**	**43.1**	**43.1**	**48.8**	**0.9**	**0.0**	**0.7**
Source: 2024 D&B Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2024																			
	Total Home Mortgage Loans				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**	**% Families**	**% Bank Loans**	**Aggregate**
Birmingham MSA	99	31,080	41.8	23,032	21.0	2.0	7.7	16.2	2.0	18.1	18.2	4.0	19.2	44.7	46.5	34.7	0.0	45.5	20.3
Mobile MSA	138	24,657	58.2	8,898	21.9	5.1	6.2	17.6	5.8	17.3	19.9	11.6	21.5	40.6	37.7	32.1	0.0	39.9	22.9
Total	**237**	**55,737**	**100.0**	**31,930**	**21.3**	**3.8**	**7.3**	**16.6**	**4.2**	**17.9**	**18.7**	**8.4**	**19.9**	**43.4**	**41.4**	**34.0**	**0.0**	**42.2**	**21.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data and Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2024											
	Total Loans to Small Businesses				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Birmingham MSA	23	5,854	31.9	21,659	89.3	52.2	45.1	2.4	21.7	8.3	26.1
Mobile MSA	49	6,847	68.1	8,841	87.8	59.2	43.4	2.9	20.4	9.3	20.4
Total	**72**	**12,701**	**100.0**	**30,500**	**88.9**	**56.9**	**44.6**	**2.6**	**20.8**	**8.6**	**22.2**
Source: 2024 D&B Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.											

STATE OF FLORIDA

CRA RATING FOR FLORIDA: SATISFACTORY

The Lending Test is rated: <u>Low Satisfactory</u>
The Investment Test is rated: <u>Low Satisfactory</u>
The Service Test is rated: <u>High Satisfactory</u>

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

CBM designated three assessment areas in the State of Florida as noted in the following table. All of the bank's assessment areas in Florida conform to technical CRA regulatory requirements.

Description Assessment Areas State of Florida			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Destin MSA	Okaloosa and Walton	70	3
Panama City MSA	Bay	50	2
Pensacola MSA	Escambia	79	1
Source: Bank Data; 2020 U.S. Census Data			

SCOPE OF EVALUATION – FLORIDA

Examiners considered the following loans granted inside the bank's Florida assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

<u>Home Mortgage Loans</u>:
- 2023: 195 loans totaling $87,167,000
- 2024: 196 loans totaling $74,925,000
- 2025: 237 loans totaling $103,821,000

<u>Small Business Loans</u>:
- 2023: 39 loans totaling $7,460,000
- 2024: 55 loans totaling $12,528,000
- 2025: 91 loans totaling $15,766,000

As suggested by the above figures, examiners afforded more weight to home mortgage loans when arriving at conclusions for this rated area given the larger volume of loans.

The following table shows that the Destin MSA assessment area generated the largest percentage of the bank's Florida loans. Consequently, examiners utilized full-scope procedures and weighed records in the Destin MSA assessment area heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the other Florida assessment areas and weighed performance in each area generally consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Florida						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Destin MSA	200,364	64.2	241,620	61.6	3	50.0
Panama City MSA	77,544	10.9	126,110	6.2	2	33.3
Pensacola MSA	34,134	24.9	24,424	32.2	1	16.7
Total	**312,042**	**100.0**	**392,154**	**100.0**	**6**	**100.0**
Source: 2023-2025 HMDA Reported Data; 2023-2025 CRA Reported Data; FDIC Summary of Deposits (6/30/2025). Due to rounding, totals may not equal 100.0 percent.						

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Refer to the institution-level Scope of Evaluation section for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

LENDING TEST

CBM demonstrated a low satisfactory record in the State of Florida regarding the Lending Test. An adequate borrower profile and a relatively high level of CD loans combined with excellent lending levels and poor geographic distribution support this conclusion. Conclusions in all three assessment areas proved consistent with the rated area.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the State of Florida. Excellent performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the State of Florida. For 2024, the bank originated 196 total reportable home mortgage loans totaling approximately $74.9 million in its Florida assessment areas. CBM captured a 0.7 percent market share of the total number of home mortgage loans and 0.8 percent market share of the total dollar volume of home mortgage loans in the Florida assessment areas. This volume of activity ranks the bank 33rd out of 794 total lenders in the bank's Florida assessment areas. This ranking lands the bank in the top 4.2 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the State of Florida. For 2024, the bank originated 55 total reportable small business loans totaling approximately $12.5 million inside its Florida assessment areas. CBM captured a 0.2 percent market share of the total number and a 1.4 percent market share of the total dollar volume of small business loans. This volume of activity ranks the bank 40th out of 143 total lenders in the bank's

Florida assessment areas. This ranking lands the bank in the top 28.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the State of Florida. The Destin MSA and Panama City MSA assessment areas demonstrated consistent performance with the rated area. Performance in the Pensacola MSA assessments area demonstrated inconsistent performance that rises above the rated area.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. The Destin MSA assessment area demonstrated inconsistent performance, falling below the rated area. Performance in the Panama City MSA and Pensacola MSA assessments areas demonstrated consistent performance with the rated area.

Community Development Loans

The institution made a relatively high level of CD loans in the State of Florida. Its fair share contribution, by dollar volume, to the overall leader level supports this conclusion. Performance in the Panama City and Destin MSA assessment areas demonstrated consistent performance, and the Pensacola MSA assessment area demonstrated inconsistent performance, falling below the state level.

The following table shows that, since the previous evaluation, the bank granted 14 CD loans totaling approximately $17.2 million in the State of Florida. The dollar amount equates to 8.1 percent of the bank's total level of CD loans compared to the 12.8 percent of total loans attributed to this state.

Community Development Loans
State of Florida

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Destin MSA	9	12,206	0	0	1	1,069	0	0	**10**	**13,275**
Panama City MSA	0	0	0	0	0	0	2	3,636	**2**	**3,636**
Pensacola MSA	2	307	0	0	0	0	0	0	**2**	**307**
Total	**11**	**12,513**	**0**	**0**	**1**	**1,069**	**2**	**3,636**	**14**	**17,218**

Source: Bank Data.

The CD loans reflect adequate responsiveness by primarily addressing affordable housing; however, they also reflect responsiveness to a variety of assessment areas' CD needs given some activity in two other CD purpose categories.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the State of Florida regarding the Investment Test. The adequate level of qualified CD investments and grants and responsiveness to CD needs coupled with the occasional use of innovative and/or complex investments support this conclusion. The Destin and Panama City MSA assessment areas reflect consistent performance with the rated area; however, the Pensacola MSA assessment area reflects inconsistent performance, falling below the rated area.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the State of Florida. The following table shows that the institution made 86 qualified investments totaling approximately $6.4 million in the State of Florida. By dollar volume, this equates to 12.5 percent of the bank's total adequate level of qualified investments compared to 9.0 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area
State of Florida

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Destin MSA	9	1,692	26	2,303	1	125	1	125	**37**	**4,245**
Panama City MSA	8	1,126	16	105	1	83	2	108	**27**	**1,422**
Pensacola MSA	7	563	13	52	1	42	1	42	**22**	**699**
Total	**24**	**3,381**	**55**	**2,460**	**3**	**250**	**4**	**275**	**86**	**6,366**

Source: Bank Data.

Responsiveness to Credit and Community Development Needs

The institution exhibits adequate responsiveness to credit and CD needs in the State of Florida. A majority of the activities financed identified needs of affordable housing followed by community services.

Community Development Initiatives

CBM occasionally uses innovative and/or complex investments to support CD initiatives in the State of Floridia. The bank made three new qualified investments totaling nearly $1.5 million in Low-Income Housing Tax Credits (LIHTC) within the State of Florida assessment areas during the evaluation period.

SERVICE TEST

CBM demonstrated a high satisfactory record for the State of Florida regarding the Service Test. The leader level of CD services combined with reasonably accessible delivery systems and reasonableness of hours and services support this conclusion. All three assessment areas demonstrated consistent performance with the rated area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas in the State of Florida. The State of Florida reflects a consistent conclusion to the institution's overall performance. As seen in the following table, the bank's lack of branches and ATMs in low-income census tracts falls 4.4 percentage points below the population in these tracts, reflecting an adequate level. CBM's branch distribution falls 6.6 percentage points below the population percentage in the moderate-income census tracts, also reflecting an adequate level. Furthermore, the level of ATMs in moderate-income census tracts trails the population percentage residing in these tracts by 3.3 percentage points, also reflecting an adequate level.

Branch and ATM Distribution by Geography Income Level State of Florida													
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Opened Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	12	6.0	34,569	4.4	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	47	23.6	182,662	23.3	1	16.7	1	20.0	0	0.0	0	0.0
Middle	86	43.2	364,841	46.5	4	66.7	4	80.0	0	0.0	0	0.0
Upper	49	24.6	202,022	25.8	1	16.7	0	0.0	0	0.0	0	0.0
NA	5	2.5	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**199**	**100.0**	**784,094**	**100.0**	**6**	**100.0**	**5**	**100.0**	**0**	**100.0**	**0**	**100.0**
Source: 2020 U.S. Census Data; Bank Data; Due to rounding, totals may not equal 100.0 percent.												

Alternative delivery systems offered in the State of Florida remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

The institution did not make any changes to branch locations since the prior evaluation in the State of Florida. Therefore, examiners did not evaluate this factor when reviewing the bank's retail banking services.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours), do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies or individuals in the State of Florida. The State of Florida reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the State of Florida. The following table shows that the bank provided 232 CD services since the previous evaluation. The current level represents 15.0 percent of the bank's total leader level of CD services compared to this state containing 10.9 percent of the bank's total branches. This figure reflects a significant increase from the 13 CD services provided at the prior evaluation. In addition to the extent of services, CD services reflect good responsiveness to CD needs as illustrated by most activities addressing an identified need of community services targeted to low- and moderate-income individuals.

Community Development Services State of Florida					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Destin MSA	7	78	0	0	**85**
Panama City MSA	1	92	1	3	**97**
Pensacola MSA	5	41	3	1	**50**
Total	**13**	**211**	**4**	**4**	**232**
Source: Bank Data.					

DESTIN MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DESTIN MSA ASSESSMENT AREA

The Destin MSA assessment area includes all of Okaloosa and Walton counties, the two counties that make up the entire Crestview-Fort Walton Beach-Destin MSA located in the Florida Panhandle.

Economic and Demographic Data

The assessment area's 70 census tracts reflect the following income designations based on 2020 U.S. Census Data: 4 low-, 13 moderate-, 30 middle-, and 20 upper-income census tracts as well as 3 census tracts without an income designation. FEMA declared this area as a major disaster area due severe storms during a majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Destin MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	70	5.7	18.6	42.9	28.6	4.3
Population by Geography	286,973	3.9	20.3	45.6	30.2	0.0
Housing Units by Geography	151,439	3.4	16.6	39.6	40.4	0.0
Owner-Occupied Units by Geography	74,047	2.6	18.2	46.7	32.6	0.0
Occupied Rental Units by Geography	33,823	7.7	27.5	39.1	25.8	0.0
Vacant Units by Geography	43,569	1.5	5.5	28.1	64.9	0.0
Businesses by Geography	49,336	4.4	14.5	40.2	40.9	0.0
Farms by Geography	385	2.9	18.7	50.9	27.5	0.0
Family Distribution by Income Level	71,753	19.7	18.7	21.5	40.1	0.0
Household Distribution by Income Level	107,870	22.8	16.7	18.8	41.7	0.0
Median Family Income MSA - 18880 Crestview-Fort Walton Beach-Destin, FL MSA		$79,490	Median Housing Value			$ 299,654
			Median Gross Rent			$1,176
			Families Below Poverty Level			7.3%
Source: 2020 U.S. Census Data 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 100.0 percent.						

According to Moody's Analytics, major employers in the area include Eglin Air Force Base Center, Walmart, and Fort Walton Beach Medical Center. According to the U.S. Bureau of Labor Statistics, as of December 2025, the Destin MSA assessment area's unemployment rate of 4.2 percent county is similar to the State of Florida at 4.3 percent and the national average at 4.4 percent.

The following table shows the applicable income ranges based on the 2024 FFIEC- estimated MFI of $96,000 for the Destin MSA.

Median Family Income Ranges - Crestview-Fort Walton Beach-Destin, FL MSA				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024 ($96,000)	<$48,000	$48,000 To <$76,800	$76,800 To <$115,200	>=$115,200
Source: FFIEC.				

Competition

The area contains a low level of competition from other chartered banks, based on its population, with 27 institutions operating 92 offices in the assessment area. CBM ranks 11th in market share by capturing 3.0 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. However, non-banks entities such as fintech companies, credit unions, mortgage companies, and finance companies further heighten the competition level with many offering the remote delivery of products through digital devices. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Considering information obtained from bank management, as well as demographic and economic data, examiners concluded the primary credit needs in the Destin MSA assessment area include home mortgage and small business loans. Furthermore, as indicated by the demographic and economic data, the AA's CD needs primarily include affordable housing and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN DESTIN MSA ASSESSMENT AREA

LENDING TEST

CBM demonstrated a low satisfactory record in the Destin MSA assessment area regarding the Lending Test. Excellent lending levels, a relatively high level of CD loans, and poor records for geographic distribution and borrower profile support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Destin MSA assessment area. Excellent performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Destin MSA assessment area. For 2024, the bank originated 109 total reportable home mortgage loans totaling approximately $50.0 million. CBM captured a 1.0 percent market share, by both number and dollar volume, which ranks 25th out of 594 total lenders in the Destin MSA assessment area. This ranking lands the bank in the top 4.2 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect adequate responsiveness to assessment area credit needs in the Destin MSA assessment area. For 2024, the bank originated 30 total reportable small business loans totaling approximately $6.6 million. CBM captured a 0.3 percent market share of the total number of loans and a 1.7 percent market share of the total dollar volume of small business loans. The bank's activity by number of loans ranks 35th out of 110 total lenders in the Destin MSA assessment area. This ranking lands the bank in the top 31.8 percent of lenders, considering the total number and dollar volume of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the Destin MSA assessment area. A poor record regarding home mortgage loans outweighs an excellent record regarding small business loans to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor penetration throughout the Destin MSA assessment area. Poor performance in moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion. As seen in the following table, the bank's lending in low-income census tracts rises 1.7 percentage points above aggregate data, reflective of adequate performance. The table further shows that in moderate-income census tracts, the bank's lending falls below aggregate data by 10.6 percentage points, reflecting a poor level.

Geographic Distribution of Home Mortgage Loans Destin MSA Assessment Area						
Tract Income Level	**% of Owner Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	2.6	2.0	4	3.7	957	1.9
Moderate						
2024	18.2	16.1	6	5.5	520	1.0
Middle						
2024	46.7	45.5	35	32.1	13,744	27.5
Upper						
2024	32.6	36.4	64	58.7	34,781	69.6
NA						
2024	0.0	0.0	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**109**	**100.0**	**50,002**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.						

Small Business Loans

The geographic distribution of small business loans reflects excellent penetration throughout the Destin MSA assessment area. Excellent performance in moderate-income geographies sufficiently outweighs adequate performance in low-income geographies to support this conclusion. As seen in the following table, the bank's lending in low-income census tracts is slightly lower than the aggregate data, reflective of adequate performance. The table further shows that in moderate-income census tracts, CBM's lending level rises 17.6 percentage points above the aggregate data, reflecting an excellent level.

Geographic Distribution of Small Business Loans Destin MSA Assessment Area						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.4	4.4	1	3.3	268	4.1
Moderate						
2024	14.5	12.4	9	30.0	2,978	45.0
Middle						
2024	40.2	39.6	10	33.3	898	13.6
Upper						
2024	40.9	43.6	10	33.3	2,469	37.3
NA						
2024	0.0	0.0	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**30**	**100.0**	**6,613**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different sizes. A poor record regarding home mortgage loans outweighs an adequate record regarding small business loans to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among retail customers of different income levels in the Destin MSA assessment area. Poor performance to moderate-income borrowers outweighs adequate performance to low-income borrowers to support this conclusion. As seen in the following table, CBM's lending to low-income borrowers trails aggregate data by 2.8 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank's lending level falls 8.5 percentage points below the aggregate data, reflecting a poor level.

Distribution of Home Mortgage Loans by Borrower Income Level Destin MSA Assessment Area						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	19.7	3.7	1	0.9	100	0.2
Moderate						
2024	18.7	13.1	5	4.6	825	1.7
Middle						
2024	21.5	18.4	10	9.2	2,000	4.0
Upper						
2024	40.1	39.4	62	56.9	30,659	61.3
NA						
2024	0.0	25.5	31	28.4	16,418	32.8
Total						
2024	**100.0**	**100.0**	**109**	**100.0**	**50,002**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.						

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Destin MSA assessment area. Adequate performance to businesses with gross annual revenue of $1 million or less supports this conclusion. The following table shows CBM's lending to businesses with gross annual revenue of $1 million or less falls 7.2 percentage points below the aggregate performance, which remains within an adequate range.

Distribution of Small Business Loans by Gross Annual Revenue Category Destin MSA Assessment Area						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	91.6	47.2	12	40.0	1,912	28.9
> $1,000,000						
2024	1.5	--	13	43.3	3,994	60.4
Revenue Not Available						
2024	6.9	--	5	16.7	707	10.7
Total						
2024	**100.0**	**100.0**	**30**	**100.0**	**6,613**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. "- -" data not available. Due to rounding, totals may not equal 100.0.						

Community Development Loans

The institution has made a relatively high level of CD loans in the Destin MSA assessment area. As noted under the rated area level, CBM originated 10 CD loans totaling approximately $13.3 million in this assessment area. By dollar volume, this equates to 77.1 percent of the bank's total relatively high level of CD loans in the State of Florida compared to 64.2 percent of loans attributed to this assessment area.

The following lists an example of a CD loan in the Destin MSA assessment area:

- ***Affordable Housing –*** The bank financed a $10.7 million loan to construct a housing complex in the assessment area to provide affordable housing primarily to low- and moderate-income college students.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the Destin MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments and grants and responsiveness to CD needs outweighs rare use of innovative and/or complex investments to support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Destin MSA assessment area. The institution made 37 qualified investments totaling approximately $4.2 million in the Destin MSA assessment area. By dollar volume, this equates to 66.7 percent of the bank's total qualified investments in the State of Florida compared to 61.6 percent of total deposits attributed to this assessment area.

The following lists an example of a qualified investment in the Destin MSA assessment area:

- ***Community Services*** –The bank invested approximately $446,000 in a bond to support renovation and construction projects for a school district primarily serving low- and moderate-income individuals since a majority of students receive free or reduced lunches.

Responsiveness to Credit and Community Development Needs

The institution's CD activities show adequate responsiveness to credit and CD needs in the Destin MSA assessment area. The table at the rated area level shows adequate responsiveness to a variety of CD needs, addressing all four CD purpose categories, with an emphasis on community services and affordable housing.

Community Development Initiatives

The institution rarely uses innovative and/or complex investments to support CD initiatives in the Destin MSA assessment area. CBM financed one new qualified investment in LIHTCs totaling approximately $746,000 within the assessment area.

SERVICE TEST

CBM demonstrated a high satisfactory record in the Destin MSA assessment area regarding the Service Test. The relatively high level of CD services and accessible delivery systems combined with the reasonableness of hours and services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the Destin MSA assessment area. The Destin MSA assessment area reflects an inconsistent conclusion to the institution's Accessibility of Delivery System performance, with performance above the institution.

As seen in the following table, CBM's lack of branches and ATMs in low-income census tracts falls 3.9 percentage points below the population in these tracts, reflecting an adequate level. CBM's level of branches and ATMs in moderate-income census tracts rises 13.3 percentage points above the population percentage in these tracts, reflecting a good level.

Branch and ATM Distribution by Geography Income Level
Destin MSA Assessment Area

Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	4	5.7	11,175	3.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	13	18.6	58,273	20.3	1	33.3	1	33.3	0	0.0	0	0.0
Middle	30	42.9	130,876	45.6	2	66.7	2	66.7	0	0.0	0	0.0
Upper	20	28.6	86,649	30.2	0	0.0	0	0.0	0	0.0	0	0.0
NA	3	4.3	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**70**	**100.0**	**286,973**	**100.0**	**3**	**100.0**	**3**	**100.0**	**0**	**100.0**	**0**	**100.0**

Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative delivery systems offered in the Destin MSA assessment area remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

The institution did not make any changes to branch locations since the prior evaluation in this assessment area. Therefore, examiners did not evaluate this factor when reviewing the bank's retail banking services.

<u>Reasonableness of Business Hours and Services</u>

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the Destin MSA assessment area, particularly low- and moderate-income geographies and/or individuals. The Destin MSA assessment area reflects product offerings, services, and branch hours generally consistent with the institution level.

<u>Community Development Services</u>

The institution provides a relatively high level of CD services in the Destin MSA assessment area. The table in the State of Florida section shows that the bank provided 85 CD services since the previous evaluation in the Destin MSA assessment area. The current level represents 36.6 percent of total leader level of CD services in this rated area compared to this assessment area containing 50.0 percent of the rated area's total branches. This figure reflects a significant increase from the 4 CD services provided at the prior evaluation.

The following lists an example of a CD service in the Destin MSA assessment area:

- ***Affordable Housing*** – A bank employee served on the board and finance committee for an affordable housing organization and provides financial expertise related to the organization's financial decision.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Panama City MSA	Consistent	Consistent	Consistent
Pensacola MSA	Consistent	Below	Consistent

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of CBM's operations and activities. The demographic data for the limited-scope assessment areas is in the appendices.

Panama City MSA Assessment Area

The Panama City MSA assessment area consists of all of Bay County. CBM operates two branches in this assessment area, one in a middle-income census tract and one in an upper-income census tract. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance below the institution. The availability of alternative delivery systems demonstrated consistent performance with the institution overall. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	66	19,977
Small Business Loans	19	3,737
CD Loans	2	3,636
Investments	27	1,422
CD Services	97	--
Source: Bank Data.		

Pensacola MSA Assessment Area

The Pensacola MSA assessment area consists of all of Escambia County. CBM operates one branch in this assessment area in a middle-income census tract, although reasonably accessible to nearby low- and moderate-income census tracts. Therefore, the distribution of branches proved consistent with the institution's overall conclusion. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	21	4,946
Small Business Loans	6	2,178
CD Loans	2	307
Investments	22	699
CD Services	50	--
Source: Bank Data.		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% 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
Panama City MSA	66	19,977	75.9	6,829	1.6	0.0	1.2	15.5	0.0	9.8	49.2	77.3	57.4	33.8	22.7	31.7	0.0	0.0	0.0
Pensacola MSA	21	4,946	24.1	8,934	4.7	4.8	4.1	26.9	19.1	25.3	42.6	52.4	43.4	25.8	23.8	27.2	0.0	0.0	0.0
Total	**87**	**24,923**	**100.0**	**15,763**	**3.5**	**1.2**	**2.8**	**22.4**	**4.6**	**18.6**	**45.1**	**71.3**	**49.4**	**28.9**	**23.0**	**29.1**	**0.0**	**0.0**	**0.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income census tracts		
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Panama City MSA	19	3,737	76.0	5,750	2.3	5.3	1.9	14.7	0.0	13.9	52.8	79.0	55.2	30.3	15.8	29.0	0.0	0.0	0.0
Pensacola MSA	6	2,178	24.0	7,544	5.7	0.0	5.3	28.2	83.3	27.3	38.7	0.0	35.2	27.4	16.7	32.2	0.0	0.0	0.0
Total	**25**	**5,915**	**100.0**	**13,294**	**4.4**	**4.0**	**3.8**	**23.0**	**20.0**	**21.5**	**44.1**	**60.0**	**43.9**	**28.5**	**16.0**	**30.8**	**0.0**	**0.0**	**0.0**
Source:2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Panama City MSA	66	19,977	75.9	6,829	17.4	0.0	3.7	18.2	4.6	10.1	21.7	9.1	18.9	42.7	69.7	44.3	0.0	16.7	22.9
Pensacola MSA	21	4,946	24.1	8,934	22.5	0.0	7.6	20.0	14.3	16.9	21.1	19.1	19.8	36.5	28.6	26.7	0.0	38.1	29.0
Total	**87**	**24,923**	**100.0**	**15,763**	**20.5**	**0.0**	**5.9**	**19.3**	**6.9**	**13.9**	**21.3**	**11.5**	**19.4**	**38.9**	**59.8**	**34.3**	**0.0**	**21.8**	**26.4**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Panama City MSA	19	3,737	76.0	5,750	91.0	73.7	47.6	1.8	15.8	7.2	10.5
Pensacola MSA	6	2,178	24.0	7,544	91.0	33.3	47.9	2.0	16.7	7.0	50.0
Total	**25**	**5,915**	**100.0**	**13,294**	**91.0**	**64.0**	**47.8**	**1.9**	**16.0**	**7.1**	**20.0**
Source:2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0.											

MEMPHIS MULTI-STATE MSA

CRA RATING FOR MEMPHIS MULTI-STATE MSA: SATISFACTORY

The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MEMPHIS MULTI-STATE MSA

The Memphis Multi-State MSA assessment area consists of Shelby County (Tennessee) and Desoto County (Mississippi), which represent two of the eight counties that comprise the entire Memphis, TN-MS-AR MSA. The institution operates four full-service branches (one in Tennessee and three in Mississippi) in the Memphis Multi-State MSA assessment area.

Economic and Demographic Data

The assessment area's 290 census tracts reflect the following income designations based on 2020 U.S. Census data: 51 low-, 77 moderate-, 60 middle-, and 90 upper-income as well as 12 census tracts with no income designation. FEMA declared this area as a major disaster area due to the severe storms during the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Memphis Multi-State MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	290	17.6	26.6	20.7	31.0	4.1
Population by Geography	1,115,058	12.9	25.6	22.7	37.6	1.2
Housing Units by Geography	474,437	15.2	26.6	22.8	34.4	1.0
Owner-Occupied Units by Geography	243,428	7.2	21.5	23.0	48.0	0.3
Occupied Rental Units by Geography	177,603	21.4	32.0	23.9	20.9	1.8
Vacant Units by Geography	53,406	31.0	32.4	18.5	17.0	1.2
Businesses by Geography	100,962	9.2	25.0	21.4	42.7	1.7
Farms by Geography	659	3.2	16.4	15.5	63.9	1.1
Family Distribution by Income Level	266,976	23.1	15.8	17.8	43.2	0.0
Household Distribution by Income Level	421,031	25.0	15.3	16.7	43.1	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		$67,639	Median Housing Value			$ 158,310
			Median Gross Rent			$985
			Families Below Poverty Level			13.1%
Source: 2020 U.S. Census Data 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 100.0 percent.						

According to Moody's Analytics, major employers in the area include FedEx Corp., Methodist Le Bonheur, and Baptist Memorial Healthcare. According to the U.S. Bureau of Labor Statistics as of December 2025, the Memphis Multi-State MSA's unemployment rate of 4.1 percent rises slightly above the State of Mississippi rate of 3.7 percent and the State of Tennessee rate of 3.6 percent but falls below the national average at 4.4 percent.

The following table shows the applicable income ranges based on the 2024 FFIEC-estimated MFI of $83,000 for the Memphis Multi-State MSA.

Median Family Income Ranges – Memphis, TN-MS-AR MSA				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024 ($83,000)	<$41,500	$41,500 To <$66,400	$66,400 To <$99,600	>=$99,600
Source: FFIEC.				

Competition

The area contains a low level of competition from other chartered banks, based on its population, with 47 institutions operating 342 offices in the assessment area. CBM ranks 32nd in market share by capturing 0.5 percent of the area's deposits based on the June 30, 2023, FDIC Deposit Market Share Report. However, non-bank entities such as fintech companies, credit unions, mortgage companies, and finance companies further heighten the competition level with many offering the remote delivery of products through digital devices. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Considering information obtained from bank management, as well as demographic and economic data, examiners concluded the primary credit needs in the Memphis Multi-State MSA assessment area include home mortgage and small business loans. Furthermore, as indicated by the demographic and economic data, the AA's CD needs primarily include affordable housing and efforts that revitalize and stabilize the area. Additionally, the percentage of the population reporting low- and moderate-incomes evidences a need for community services that benefit these individuals.

SCOPE OF EVALUATION – MEMPHIS MULTI-STATE MSA

Examiners considered the following loans granted inside the Memphis Multi-State MSA assessment area as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:
- 2023: 187 loans totaling $32,514,000
- 2024: 206 loans totaling $30,707,000
- 2025: 204 loans totaling $43,646,000

Small Business Loans:
- 2023: 145 loans totaling $17,561,000
- 2024: 160 loans totaling $19,141,000
- 2025: 180 loans totaling $27,397,000

Since home mortgage loans reflect a larger volume, examiners afforded slightly more weight to this product when arriving at conclusions for this rated area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MEMPHIS MULTI-STATE MSA

LENDING TEST

CBM demonstrated a high satisfactory record in the Memphis Multi-State MSA regarding the Lending Test. A relatively high level of CD loans and excellent lending levels combined with adequate performance regarding geographic distribution and borrower profile support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Memphis Multi-State MSA. Excellent performance regarding home mortgage loans outweighs good performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Memphis Multi-State MSA. For 2024, the bank originated 206 total reportable home mortgage loans totaling approximately $30.7 million. CBM captured a 0.9 percent market share of the total number and a 0.5 percent market share of the total dollar volume of home mortgage loans. The bank's activity by number of loans ranks 28th out of 509 total lenders in the Memphis Multi-State MSA assessment area. This ranking lands the bank in the top 5.5 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect good responsiveness to assessment area credit needs in the Memphis Multi-State MSA. For 2024, the bank originated 160 total reportable small business loans totaling approximately $19.1 million. CBM captured a 0.8 percent market share of the total number of loans and a 2.1 percent market share of the total dollar volume of small business loans. The bank's activity by number of loans ranks 22nd out of 129 total lenders in the Memphis Multi-State MSA assessment area. This ranking lands the bank in the top 17.1 percent of lenders, considering the total number and dollar volume of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Memphis Multi-State MSA assessment area. Adequate records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the Memphis Multi-State MSA assessment area. Adequate performance in low-income and moderate-income geographies supports this conclusion. As seen in the following table, CBM's lending in low-income census tracts rises above aggregate data by 4.4 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts, the bank's lending level also rises slightly above aggregate data by 3.1 percentage points, reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Memphis Multi-State MSA Assessment Area						
Tract Income Level	**% of Owner Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.2	6.3	22	10.7	865	2.8
Moderate						
2024	21.5	17.8	43	20.9	4,985	16.2
Middle						
2024	23.0	24.5	40	19.4	5,422	17.7
Upper						
2024	48.0	51.1	101	49.0	19,435	63.3
NA						
2024	0.3	0.2	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**206**	**100.0**	**30,707**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Memphis Multi-State MSA assessment area. Adequate performance in low- and moderate-income geographies supports this conclusion. As seen in the following table, the bank's lending in low-income census tracts rise slightly above aggregate data, reflective of adequate performance. The table further shows that in moderate-income census tracts, CBM's lending level rises 3.1 percentage points above the aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Business Loans Memphis Multi-State MSA Assessment Area						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	9.2	7.7	14	8.8	1,441	7.5
Moderate						
2024	25.0	18.2	34	21.3	5,006	26.2
Middle						
2024	21.4	19.1	24	15.0	2,814	14.7
Upper						
2024	42.7	53.4	87	54.4	9,829	51.4
NA						
2024	1.7	1.7	1	0.6	51	0.3
Total						
2024	**100.0**	**100.0**	**160**	**100.0**	**19,141**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. An adequate record regarding home mortgage loans outweighs a poor record regarding small business loans to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Memphis Multi-State MSA assessment area. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low-income borrowers slightly trails aggregate data by 1.1 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 1.2 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Memphis Multi-State MSA Assessment Area						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	23.1	5.5	9	4.4	697	2.3
Moderate						
2024	15.8	13.8	26	12.6	2,266	7.4
Middle						
2024	17.8	18.0	35	17.0	4,867	15.9
Upper						
2024	43.2	36.5	79	38.4	15,165	49.4
NA						
2024	0.0	26.2	57	27.7	7,712	25.1
Total						
2024	**100.0**	**100.0**	**206**	**100.0**	**30,707**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of borrowers reflects poor penetration among business customers of different sizes in the Memphis Multi-State MSA assessment area. Poor performance to businesses with gross annual revenue of $1 million or less supports this conclusion. The following table illustrates CBM's lending to businesses with gross annual revenue of $1 million or less trails aggregate data by 16.9 percentage points, reflecting poor performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Memphis Multi-State MSA Assessment Area						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	88.3	46.9	48	30.0	4,987	26.1
> $1,000,000						
2024	2.8	--	100	62.5	13,561	70.9
Revenue Not Available						
2024	8.9	--	12	7.5	593	3.1
Total						
2024	**100.0**	**100.0**	**160**	**100.0**	**19,141**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. "- -" data not available. Due to rounding, totals may not equal 100.0 percent.						

Community Development Loans

The institution has made a relatively high level of CD loans in the Memphis Multi-State MSA assessment area. Its fair share contribution, by dollar volume, to the overall leader level supports this conclusion. The bank granted 55 CD loans totaling approximately $21.3 million in this area. The dollar amount equates to 10.1 percent of the bank's total CD loans compared to 7.1 percent of total loans attributed to this area. The CD loans reflect good responsiveness to the area's CD needs given notable activity in three of four CD purpose categories, with the most significant impact in economic development and affordable housing.

The following lists an example of a CD loan in the Memphis Multi-State MSA assessment area:

- ***Economic Development*** **–** The bank originated a $1.9 million loan to fund the purchase and renovation of an abandoned commercial building. The funds will be used to convert the space to a convenience store and gas station, which will create several full-time and part-time employment opportunities benefiting low- and moderate-income individuals in the assessment area.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the Memphis Multi-State MSA regarding the Investment Test. The adequate level of qualified investments and responsiveness to CD needs support this conclusion.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Memphis Multi-State MSA. CBM made 19 qualified investments totaling approximately $2.6 million in the Memphis Multi-State MSA assessment area. By dollar volume, this equates to 5.2 percent of the bank's total adequate level of qualified investments compared to 4.9 percent of total deposits attributed to this rated area. Refer to the qualified investment table at the institution level for details.

The following lists an example of a qualified investment in the Memphis Multi-State MSA assessment area:

- ***Affordable Housing*** – The institution invested $1.0 million in a bond to purchase a 216-unit apartment complex that provides affordable housing for low- and moderate-income families.

Responsiveness to Credit and Community Development Needs

CBM exhibits adequate responsiveness to credit and CD needs in the Memphis Multi-State MSA. As noted in the table at the institution level, the qualified investments in the Memphis Multi-State MSA assessment area primarily address affordable housing needs.

Community Development Initiatives

CBM does not use innovative and/or complex investments to support CD initiatives in the Memphis Multi-State MSA.

SERVICE TEST

CBM demonstrated a high satisfactory record in the Memphis Multi-State MSA regarding the Service Test. The leader level of CD services combined with adequate accessibility of delivery systems and reasonableness of hours and services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Memphis Multi-State MSA. The Memphis Multi-State MSA assessment area reflects consistent conclusion to the institution's Accessibility of Delivery System performance. The bank's lack of branches in low-income census tracts falls 12.9 percentage points below the population in these tracts, reflecting a poor level. However, the bank's branch distribution in moderate-income census tracts reflects a similar level to the population percentage in these tracts, reflecting an adequate level.

Branch and ATM Distribution by Geography Income Level
Memphis Multi-State MSA Assessment Area

Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	51	17.6	143,782	12.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	77	26.6	285,857	25.6	1	25.0	1	33.3	0	0.0	0	0.0
Middle	60	20.7	252,907	22.7	2	50.0	2	66.7	0	0.0	0	0.0
Upper	90	31.0	419,357	37.6	1	25.0	0	0.0	0	0.0	0	0.0
NA	12	4.1	13,155	1.2	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**290**	**100.0**	**1,115,058**	**100.0**	**4**	**100.0**	**3**	**100.0**	**0**	**100.0**	**0**	**100.0**

Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.

The bank's lack of ATMs in low-income census tracts falls 12.9 percentage points below the population in these tracts, reflecting poor performance. However, the bank's ATMs in moderate-income census tracts rises 7.7 percentage points above the population percentage in these tracts, reflecting adequate performance.

Alternative delivery systems offered in the Memphis Multi-State MSA assessment area remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

The institution did not make any changes to branch locations since the prior evaluation in the Memphis Multi-State MSA. Therefore, examiners did not evaluate this factor when reviewing the bank's retail banking services.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the Memphis Multi-State MSA assessment area, particularly low- and moderate-income geographies and/or individuals. The Memphis Multi-State MSA assessment area reflects product offerings, services, and branch hours consistent with discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the Memphis Multi-State MSA. As reflected in the table at the institution level, the bank provided 96 CD services since the previous evaluation in this rated area. The current level represents 6.2 percent of the bank's total leader level of CD services compared to this rated area containing 7.3 percent of the bank's total branches. This figure reflects an increase from the 45 CD services provided at the prior evaluation.

In addition to the extent of services, CD services reflect good responsiveness to available opportunities as illustrated by a significant majority of CD services providing community services targeted to low- and moderate-income individuals.

The following lists an example of a CD service in the Memphis Multi-State MSA assessment area:

- ***Community Services –*** Several bank employees served as facilitators to assist organizations in the community with applying for the Partnership Grant through the FHLB of Dallas. The funds from the program helped to provide resources to low- and moderate-income families and geographies.

STATE OF MISSISSIPPI

CRA RATING FOR MISSISSIPPI: SATISFACTORY

The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSISSIPPI

CBM designated four assessment areas in the State of Mississippi as noted in the following table. All of the bank's assessment areas in Mississippi conform to technical CRA regulatory requirements.

Description of Assessment Areas State of Mississippi			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Biloxi MSA	Hancock, Harrison, Jackson	143	8
Hattiesburg MSA	Forrest, Lamar	38	2
Jackson MSA	Hinds, Madison, Rankin, Scott	138	10
Mississippi Non-MSA	George, Greene, Jones, Lauderdale, Lee, Monroe, Oktibbeha Smith, Sunflower,	114	18
Source: Bank Data; 2020 U.S. Census Data			

SCOPE OF EVALUATION – MISSISSIPPI

Examiners considered the following loans granted inside the State of Mississippi assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:
- 2023: 2,247 loans totaling $330,007,000
- 2024: 2,276 loans totaling $341,979,000
- 2025: 2,459 loans totaling $352,539,000

Small Business Loans:
- 2023: 1,841 loans totaling $130,918,000
- 2024: 1,725 loans totaling $126,469,000
- 2025: 2,481 loans totaling $216,584,000

As suggested by the preceding figures, home mortgage loans received the most weight when arriving at applicable conclusions given the higher volume of loans.

The following table shows that the Jackson MSA and Mississippi Non-MSA assessment areas contained the largest percentage of the bank's loans, deposits, and branches in Mississippi. Consequently, examiners applied full-scope procedures and weighed records in the Jackson MSA and Mississippi Non-MSA assessment areas heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the remaining Mississippi assessment areas and weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Mississippi						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Biloxi MSA	326,286	21.0	598,530	17.8	8	21.1
Hattiesburg MSA	119,166	7.7	217,882	6.5	2	5.3
Jackson MSA	581,920	37.5	1,210,037	36.1	10	26.3
Mississippi Non-MSA	525,305	33.8	1,325,876	39.6	18	47.4
Total	**1,552,677**	**100.0**	**3,352,325**	**100.0**	**38**	**100.0**
Source: 2023-2025 HMDA Reported Data; 2023-2025 CRA Reported Data; FDIC Summary of Deposits (6/30/2025); Due to rounding, totals may not equal 100.0 percent.						

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Refer to the institution-level Scope of Evaluation section for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MISSISSIPPI

LENDING TEST

CBM demonstrated a high satisfactory record in the State of Mississippi regarding the Lending Test. The relatively high level of CD lending and excellent lending levels combined with adequate geographic distribution and borrower profile support this conclusion. The Biloxi MSA, Hattiesburg MSA, and Mississippi Non-MSA assessment areas demonstrated consistent performance with the rated area's overall conclusion. The Jackson MSA assessment area demonstrated inconsistent performance, falling below the rated area.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. Excellent performance regarding home mortgage and small business loans support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. For 2024, the bank originated 2,276 total reportable home mortgage loans totaling approximately $342.0 million. CBM captured a 7.0 percent market share of the total number and a 5.3 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 2nd out of 452 total lenders in the bank's Mississippi assessment areas. This ranking lands the bank in the top 0.4 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. For 2024, the bank originated 1,725 total reportable small business loans totaling approximately $126.5 million inside its Mississippi assessment areas. CBM captured a 6.0 percent market share of the total number and a 9.2 percent market share of the total dollar volume of small business loans. This volume of activity ranks the bank 3rd out of 132 total lenders in the bank's Mississippi assessment areas. This ranking lands the bank in the top 2.3 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the State of Mississippi. The Jackson MSA, Hattiesburg, MSA, and Biloxi MSA assessment areas demonstrated consistent performance, while the Mississippi Non-MSA assessment area demonstrated inconsistent performance, rising above that of the rated area.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. The Jackson MSA, Biloxi MSA, and Mississippi Non-MSA assessment areas demonstrated consistent performance, while the Hattiesburg MSA assessment area demonstrated inconsistent performance, rising above that of the rated area.

Community Development Loans

The institution has made a relatively high level of CD loans in the State of Mississippi. Its fair share contribution, by dollar volume, to the overall leader level supports this conclusion. Performance in the Mississippi Non-MSA, Biloxi MSA, and Hattiesburg MSA assessment areas demonstrated consistent performance. Performance in the Jackson MSA assessment area demonstrated inconsistent performance, falling below the overall conclusion for the rated area.

The following table shows that, since the previous evaluation, the bank granted 97 CD loans totaling approximately $128.3 million in this state. The dollar amount equates to 60.6 percent of the bank's total CD loans compared to the 63.7 percent of total loans attributed to this state.

Community Development Loans State of Mississippi										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Biloxi MSA	9	6,340	0	0	7	18,369	3	6,000	**19**	**30,709**
Hattiesburg MSA	8	3,690	0	0	0	0	2	4,219	**10**	**7,909**
Jackson MSA	7	2,134	0	0	10	27,190	3	6,695	**20**	**36,019**
Mississippi Non-MSA	8	1,251	0	0	13	17,836	19	24,570	**40**	**43,657**
Statewide	1	1,432	0	0	6	8,309	1	250	**8**	**9,991**
Total	**33**	**14,847**	**0**	**0**	**36**	**71,704**	**28**	**41,734**	**97**	**128,285**
Source: Bank Data.										

The CD loans also reflect good responsiveness to the state's CD needs given notable activity in three of four CD purpose categories, with significant impact particularly addressing economic development and revitalize/stabilize efforts.

The following lists an example of a CD loan in the broader statewide area of Mississippi:

- ***Affordable Housing*** – The bank originated a $1.4 million loan to purchase an apartment complex that provides below-market, affordable housing, which benefits low- and moderate-income individuals located in the Mississippi Delta Region.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the State of Mississippi regarding the Investment Test. The adequate level of qualified investments and adequate responsiveness to CD needs support this conclusion. The Mississippi Non-MSA, Jackson MSA, and Biloxi MSA assessment areas reflect consistent performance with the rated area, and the Hattiesburg MSA assessment area reflects inconsistent performance as it exceeds the overall performance for the rated area.

Investment and Grant Activity

The bank has an adequate level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the State of Mississippi. The following table shows that CBM made 519 qualified investments totaling approximately $36.1 million in the State of Mississippi. By dollar volume, this equates to 71.1 percent of the bank's total adequate level of qualified investments compared to 77.1 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area State of Mississippi										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Biloxi MSA	14	3,849	112	452	1	61	6	115	**133**	**4,477**
Hattiesburg MSA	10	709	21	15	0	0	5	4,833	**36**	**5,557**
Jackson MSA	16	4,215	72	242	2	71	10	7,984	**100**	**12,512**
Mississippi Non-MSA	64	6,633	158	122	2	2,320	26	4,519	**250**	**13,594**
Total	**104**	**15,406**	**363**	**831**	**5**	**2,452**	**47**	**17,451**	**519**	**36,140**
Source: Bank Data.										

Responsiveness to Credit and Community Development Needs

CBM exhibits adequate responsiveness to credit and CD needs in the State of Mississippi. The previous table shows responsiveness to CD needs all four CD purpose categories, with most activities supporting revitalization and stabilization efforts and affordable housing.

Community Development Initiatives

The institution does not use innovative and/or complex investments to support CD initiatives in the State of Mississippi.

SERVICE TEST

CBM demonstrated a high satisfactory record for the State of Mississippi regarding the Service Test. The changes in branch locations and reasonably accessible delivery systems and hours and services combined with a leader level of CD services support this conclusion. The Mississippi Non-MSA, Biloxi MSA, and Hattiesburg MSA assessment areas demonstrated consistent performance with the rated area, while the Jackson MSA assessment area demonstrated inconsistent performance, falling below the rated area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas in the State of Mississippi. As seen in the following table, CBM's level of branches in low-income census tracts falls 3.1 percentage points below the population percentage residing in these tracts, reflecting adequate performance. In moderate-income census tracts, the bank's level of branches rises 8.7 percentage points above the population percentage residing in these tracts, also reflecting adequate performance.

Branch and ATM Distribution by Geography Income Level State of Mississippi													
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Opened Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	33	7.8	80,357	5.7	1	2.6	1	2.6	0	0.0	0	0.0
Moderate	78	18.4	247,347	17.6	10	26.3	9	23.7	1	33.3	0	0.0
Middle	155	36.6	530,478	37.8	14	36.8	15	39.5	0	0.0	0	0.0
Upper	141	33.3	528,238	37.6	12	31.6	13	34.2	2	66.7	0	0.0
NA	17	4.0	18,867	1.3	1	2.6	0	0.0	0	0.0	0	0.0
Totals	**424**	**100.0**	**1,405,287**	**100.0**	**38**	**100.0**	**38**	**100.0**	**3**	**100.0**	**0**	**100.0**
Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.												

The preceding table shows that the bank's level ATMs in low-income census tracts falls 3.1 percentage points below the population in low-income census tracts, thereby reflecting an adequate level. The bank's level of ATMs in moderate-income census tracts rises 6.1 percentage points above the population in moderate-income census tracts, also reflecting an adequate level.

Alternative delivery systems offered in the State of Mississippi remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the State of Mississippi has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch opened in a moderate-income census tract, two branches opened in upper-income census tracts, and no branches closed in the State of Mississippi since the prior evaluation.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals. The State of Mississippi reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

Community Development Services

The institution is a leader in providing CD services in the State of Mississippi. The following table shows that the bank provided 984 CD services since the previous evaluation in the State of Mississippi. The current level represents 63.6 percent of the bank's total leader level of CD services compared to this rated area containing 69.1 percent of the bank's total branches. This figure reflects a significant increase from the 386 CD services provided at the prior evaluation.

The CD services reflect good responsiveness to available opportunities as illustrated by their level of addressing CD needs in areas all categories. However, a significant majority of CD services provided community services targeted to low- and moderate-income individuals.

Community Development Services State of Mississippi					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Biloxi MSA	18	183	0	60	**261**
Hattiesburg MSA	1	36	0	1	**38**
Jackson MSA	37	291	2	19	**349**
Mississippi Non-MSA	8	322	0	6	**336**
Total	**64**	**832**	**2**	**86**	**984**
Source: Bank Data.					

MISSISSIPPI NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSISSIPPI NON-MSA ASSESSMENT AREA

The Mississippi Non-MSA assessment area includes all of George, Greene, Jones, Lauderdale, Lee, Monroe, Oktibbeha, Smith, and Sunflower counties located in southeastern Mississippi.

<u>Economic and Demographic Data</u>

The assessment area's 114 census tracts reflect the following income designations based on 2020 U.S. Census Data: 4 low-, 15 moderate-, 47 middle-, and 45 upper-income census tracts as well as 3 census tracts with no income designation. FEMA declared this assessment area as a major disaster area due to severe storms during the majority of the evaluation period. Additionally, the FFIEC designated three census tracts in Greene County, four census tracts in Lauderdale County, five census tracts Oktibbeha County, three census tracts in Smith County, and three census tracts in Sunflower County as distressed and/or underserved during the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Mississippi Non-MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	114	3.5	13.2	41.2	39.5	2.6
Population by Geography	387,601	2.4	13.5	41.2	42.9	0.0
Housing Units by Geography	172,005	2.9	13.6	42.2	41.3	0.0
Owner-Occupied Units by Geography	98,579	1.4	11.2	42.3	45.1	0.0
Occupied Rental Units by Geography	46,334	5.7	17.7	40.2	36.4	0.0
Vacant Units by Geography	27,092	3.9	15.7	44.9	35.5	0.0
Businesses by Geography	30,591	4.3	13.2	43.5	38.9	0.2
Farms by Geography	997	0.7	7.9	54.8	36.6	0.0
Family Distribution by Income Level	94,427	20.4	14.3	18.1	47.2	0.0
Household Distribution by Income Level	144,913	25.0	13.7	14.3	47.1	0.0
Mississippi Non-MSA Median Family Income		$52,591	Median Housing Value			$ 121,095
			Median Gross Rent			$720
			Families Below Poverty Level			14.9%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to Moody's Analytics, major employers in the area include local public school districts and hospitals. According to the U.S. Bureau of Labor Statistics as of December 2025, the average unemployment rate for the counties in the assessment area of 4.7 percent rises above the State of Mississippi rate of 3.7 percent the national average of 4.4 percent.

The following table shows the applicable income ranges based on the 2024 FFIEC- estimated MFI of $64,400 for the Mississippi Non-MSA.

Median Family Income Ranges - Mississippi Non-MSA				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024 ($64,400)	<$32,200	$32,200 To <$51,520	$51,520 To <$77,280	>=$77,280

Source: FFIEC.

Competition

The area contains a moderate level of competition from other chartered banks, based on its population, with 28 institutions operating 150 offices in the assessment area. CBM ranks 3rd in market share by capturing 10.9 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. However, various non-bank entities also operate in the area and further heighten the competition level, with many offering the remote delivery of products through digital devices.

Community Contact

Examiners conducted a community contact with an individual familiar with businesses and the local economy in Oktibbeha County. The community contact stated that Oktibbeha County is part of a bigger area known as the golden triangle, which has seen a lot of growth over the past few years. The contact further indicated that small businesses are growing and developing in the Oktibbeha County area. In addition, several financial institutions compete to provide small business lending in the area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that small business lending represents a primary credit need within the assessment area. Small business lending opportunities and demand are significant throughout the assessment area.

A need exists for increased access to consumer and commercial retail banking services and CD services to low- and moderate-income borrowers and census tracts as well as to revitalize and stabilize the area due to the disaster declarations.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MISSISSIPPI NON-MSA ASSESSMENT AREA

LENDING TEST

CBM demonstrated a high satisfactory record in the Mississippi Non-MSA assessment area regarding the Lending Test. A relatively high level of CD loans and excellent lending combined with adequate borrower profile and good geographic distribution support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Mississippi Non-MSA assessment area. Excellent performance regarding home mortgage and small business loans supports this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Mississippi Non-MSA assessment area. For 2024, the bank originated 898 total reportable home mortgage loans totaling approximately $107.8 million. CBM captured a 12.5 percent market share of the total number and a 9.1 percent market share of the total dollar volume of home mortgage loans. The bank's activity by number of loans ranks it 1st out of 262 total lenders in the Mississippi Non-MSA assessment area, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to assessment area credit needs in the Mississippi Non-MSA assessment area. For 2024, the bank originated 730 total reportable small business loans totaling approximately $45.4 million. CBM captured an 11.1 percent market share of the total number of loans and a 13.3 percent market share of the total dollar volume of loans. The bank's activity by number of loans ranks it 2nd out of 84 total lenders in the Mississippi Non-MSA assessment area. This ranking lands the bank in the top 2.4 percent of lenders, considering the total number and dollar volume of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the Mississippi Non-MSA assessment area. A good record regarding home mortgage loans outweighs an adequate record regarding small business loans to support this conclusion.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects good penetration throughout the Mississippi Non-MSA assessment area. Good performance in moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion. As seen in the following table, CBM's lending in low-income census tracts is similar to aggregate data, reflective of adequate performance. The table further shows that in moderate-income census tracts, the bank's lending level exceeds aggregate data by 8.3 percentage points, reflecting a good level.

Geographic Distribution of Home Mortgage Loans Mississippi Non-MSA Assessment Area						
Tract Income Level	**% of Owner Occupied Housing Units**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	1.4	0.5	3	0.3	68	0.1
Moderate						
2024	11.2	8.7	153	17.0	12,318	11.4
Middle						
2024	42.3	40.0	384	42.8	46,227	42.9
Upper						
2024	45.1	50.6	358	39.9	49,137	45.6
NA						
2024	0.0	0.1	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**898**	**100.0**	**107,750**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Mississippi Non-MSA assessment area. Adequate performance in low- and moderate-income geographies supports this conclusion. As seen in the following table, the bank's lending in low-income census tracts trails aggregate data by 3.0 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts, the bank's lending level rises above aggregate data by 4.0 percentage points, also reflecting an adequate level.

Geographic Distribution of Small Business Loans Mississippi Non-MSA Assessment Area						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	4.3	3.8	6	0.8	1,038	2.3
Moderate						
2024	13.2	9.8	101	13.8	10,121	22.3
Middle						
2024	43.5	42.1	328	44.9	16,906	37.2
Upper						
2024	38.9	44.2	294	40.3	17,364	38.2
NA						
2024	0.2	0.2	1	0.1	16	0.0
Total						
2024	**100.0**	**100.0**	**730**	**100.0**	**45,445**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. An adequate record regarding home mortgage loans outweighs an excellent record regarding small business loans to support this conclusion.

Home Mortgage Loans
The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Mississippi Non-MSA assessment area. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low- and moderate-income borrowers rises slightly above the aggregate data, both of which reflect adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Mississippi Non-MSA Assessment Area						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	20.4	4.1	40	4.5	1,270	1.2
Moderate						
2024	14.3	11.0	103	11.5	6,482	6.0
Middle						
2024	18.1	18.6	142	15.8	12,929	12.0
Upper						
2024	47.2	42.2	454	50.6	65,535	60.8
NA						
2024	0.0	24.1	159	17.7	21,534	20.0
Total						
2024	**100.0**	**100.0**	**898**	**100.0**	**107,750**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of borrowers reflects excellent penetration among business customers of different sizes in the Mississippi Non-MSA assessment area. Excellent performance to businesses with gross annual revenue of $1 million or less supports this conclusion. The following table shows CBM's lending to businesses with gross annual revenue of $1 million or less rises 26.1 percentage points above the aggregate data, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Mississippi Non-MSA Assessment Area						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	87.6	54.3	587	80.4	25,989	57.2
> $1,000,000						
2024	2.1	--	79	10.8	12,960	28.5
Revenue Not Available						
2024	10.2	--	64	8.8	6,496	14.3
Total						
2024	**100.0**	**100.0**	**730**	**100.0**	**45,445**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent.						

Community Development Loans

The institution has made a relatively high level of CD loans in the Mississippi Non-MSA assessment area. As noted under the rated area level, CBM originated 40 CD loans totaling approximately $43.7 million in the Mississippi Non-MSA assessment area. By dollar volume, this equates to 34.0 percent of the bank's relatively high level of CD lending in the State of Mississippi compared to 33.8 percent of the rated area's totals loans attributed to this assessment area. The CD loans also exhibit good responsiveness by largely addressing revitalize/stabilize efforts, which reflects an identified need.

The following lists an example of a CD loan in the Mississippi Non-MSA assessment area:

- ***Economic Development*** - The bank originated a $5.9 million loan where the funds were utilized to purchase and renovate two hotels. This loan promotes economic development by creating/retaining several permanent employment opportunities that benefit low- and moderate-income individuals.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the Mississippi Non-MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments and grants and adequate responsiveness support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routine provided by private investors, in the Mississippi Non-MSA assessment area. The table for the State of Mississippi shows that CBM made 250 qualified investments totaling approximately $13.6 million in the Mississippi Non-MSA assessment area. By dollar volume, this equates to 37.6 percent of the rated area's total adequate level of CD investments compared to 39.6 percent of rated area's total deposits attributed to this assessment area.

The following lists an example of a CD investment in the Mississippi Non-MSA assessment area:

- ***Affordable Housing* –** The bank invested $1.2 million in a bond to finance the construction of an apartment complex. The apartment's rents provide affordable housing for low- and moderate-income families.

Responsiveness to Credit and Community Development Needs

CBM exhibits adequate responsiveness to credit and CD needs in the Mississippi Non-MSA assessment area. As noted in the qualified investment table for the State of Mississippi, the Mississippi Non-MSA assessment area's qualified investments show adequate responsiveness to CD needs by primarily addressing revitalization and stabilization efforts and affordable housing.

Community Development Initiatives

The institution does not use innovative and/or complex investments to support CD initiatives in the Mississippi Non-MSA assessment area.

SERVICE TEST

CBM demonstrated a high satisfactory record in the Mississippi Non-MSA assessment area regarding the Service Test. The accessible delivery systems, changes in branch locations, and reasonableness of hours and services combined with a leader level of CD services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the Mississippi Non-MSA assessment area. The Mississippi Non-MSA assessment area reflects an inconsistent conclusion to the institution's overall Accessibility of Delivery System performance, with performance above the institution. The following table shows the bank's level of branches in low-income census tracts exceeds the population in those tracts by 3.2 percentage points, reflecting adequate performance. In moderate-income census tracts, CBM's level of branches rises 14.3 percentage points above the population percentage, reflecting excellent performance.

Branch and ATM Distribution by Geography Income Level
Mississippi Non-MSA Assessment Area

Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	4	3.5	9,309	2.4	1	5.6	1	6.3	0	0.0	0	0.0
Moderate	15	13.2	52,440	13.5	5	27.8	4	25.0	1	50.0	0	0.0
Middle	47	41.2	159,482	41.2	7	38.9	6	37.5	0	0.0	0	0.0
Upper	45	39.5	166,309	42.9	5	27.8	5	31.3	1	50.0	0	0.0
NA	3	2.6	61	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**114**	**100.0**	**387,601**	**100.0**	**18**	**100.0**	**16**	**100.0**	**2**	**100.0**	**0**	**100.0**

Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.

The prior table shows the bank's level of ATMs in low-income census tracts rises 3.9 percentage points above the population of low-income census tracts, reflecting adequate performance. The bank's ATMs in moderate-income census tracts rises 11.5 percentage points above the population percentage, reflecting good performance.

Alternative delivery systems offered in the Mississippi Non-MSA assessment area remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the Mississippi Non-MSA assessment area has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch opened in a moderate-income census tract, one branch opened in an upper-income census tract, and no branches closed in the Mississippi Non-MSA assessment area since the prior evaluation.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences certain portions of the Mississippi Non-MSA assessment area, particularly low- and moderate-income geographies and/or individuals. The Mississippi Non-MSA assessment area reflects product offerings, services, and branch hours consistent with the institution overall.

Community Development Services

The institution is a leader in providing CD services in the Mississippi Non-MSA assessment area. The table in the State of Mississippi section shows that the bank provided 336 CD services since the previous evaluation in the Mississippi Non-MSA assessment area. The current level represents 34.1 percent of the total leader level of CD services in this rated area compared to this assessment area containing 47.4 percent of the rated area's total branches. This figure reflects a notable increase from the 127 CD services provided at the prior evaluation.

The following lists an example of a CD service in the Mississippi Non-MSA assessment area:

- ***Community Services*** – Several employees provided financial education sessions at schools where a majority of students receive free or reduced lunches. Therefore, these financial education sessions primarily benefit low- and moderate-income students.

JACKSON MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN JACKSON MSA ASSESSMENT AREA

The Jackson MSA assessment area includes all of Hinds, Madison, Rankin, and Scott counties, which represent four of the eight counties that comprise the Jackson MSA located in central Mississippi.

Economic and Demographic Data

The assessment area's 138 census tracts reflect the following income designations based on 2020 U.S. Census Data: 19 low-, 27 moderate-, 44 middle-, and 46 upper-income census tracts as well as 2 census tracts with no income designation. FEMA declared this assessment area as a major disaster area due to severe storms during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Jackson MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	138	13.8	19.6	31.9	33.3	1.5
Population by Geography	521,908	8.9	17.2	35.2	38.3	0.4
Housing Units by Geography	221,078	10.8	19.3	34.9	34.3	0.7
Owner-Occupied Units by Geography	131,865	5.7	12.9	38.2	43.1	0.1
Occupied Rental Units by Geography	64,014	19.0	28.4	29.8	21.0	1.7
Vacant Units by Geography	25,199	17.1	29.4	30.9	21.6	1.0
Businesses by Geography	73,132	7.3	14.0	32.5	42.4	3.9
Farms by Geography	1,281	3.4	8.4	37.2	49.2	1.7
Family Distribution by Income Level	130,095	21.3	15.3	19.3	44.1	0.0
Household Distribution by Income Level	195,879	23.2	15.2	16.8	44.8	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		$66,234	Median Housing Value			$ 146,352
			Median Gross Rent			$893
			Families Below Poverty Level			11.2%
Source: 2020 U.S. Census Data 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 100.0 percent.						

According to Moody's Analytics, major employers in the area include University of Mississippi Medical Center., Merit Health, and Nissan North America. According to the U.S. Bureau of Labor Statistics as of December 2025, the Jackson MSA's unemployment rate of 3.1 percent fell below the State of Mississippi rate of 3.7 percent and the national average rate of 4.4 percent.

The following table shows the applicable income ranges based on the 2024 FFIEC-estimated MFI of $79,600 for the Jackson MSA.

Median Family Income Ranges - Jackson, MS MSA				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥ 120%**
2024 ($79,600)	<$39,800	$39,800 To <$63,680	$63,680 To <$95,520	>=$95,520
Source: FFIEC.				

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with 31 institutions operating 213 offices in the assessment area. CBM ranks 6th in market share by capturing 5.7 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. However, non-bank entities such as fintech companies, credit unions, mortgage companies, and finance companies heighten the competition level, with many offering the remote delivery of products through digital devices. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans. The volume of the assessment area's families considered low- or moderate-income, with 11.2 percent below the poverty level, signifies a need for CD services. Also, the percentage of low- and moderate-income census tracts and the disaster declarations support the need for revitalization and stabilization efforts.

CONCLUSIONS ON PERFORMANCE CRITERIA IN JACKSON MSA ASSESSMENT AREA

LENDING TEST

CBM demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Lending Test. Adequate performance for geographic distribution, borrower profile, and CD loans combined with excellent lending levels support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. Excellent performance regarding home mortgage loans and small business loans supports this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. For 2024, the bank originated 820 total reportable home mortgage loans totaling approximately $125.4 million. CBM captured a 6.5 percent market share of the total number and a 4.8 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 3rd out of 304 total lenders in the Jackson MSA assessment area. This ranking lands the bank in the top 1.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. For 2024, the bank originated 664 total reportable small business loans

totaling approximately $49.1 million. CBM captured a 5.4 percent market share of the total number and a 7.9 percent market share of the total dollar volume of small business loans. This volume of activity ranks the bank 4th out of 99 total lenders in the Jackson assessment area. This ranking lands the bank in the top 4.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Jackson MSA assessment area. Adequate records regarding home mortgage loans and small business loans support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate penetration throughout the Jackson MSA assessment area. Adequate performance in low- and moderate-income geographies supports this conclusion. As seen in the following table, the bank's lending in low-income census tracts rises slightly above aggregate data by 1.7 percentage points, which reflects adequate performance. The table further shows that in moderate-income census tracts, the bank's lending level rises 4.0 percentage points higher than aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans
Jackson MSA Assessment Area

Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	$(000s)	%
Low						
2024	5.7	2.5	34	4.2	1,870	1.5
Moderate						
2024	12.9	9.9	114	13.9	10,068	8.0
Middle						
2024	38.2	35.2	294	35.9	38,621	30.8
Upper						
2024	43.1	52.3	378	46.1	74,851	59.7
NA						
2024	0.1	0.1	0	0.0	0	0.0
Total						
2024	**100.0**	**100.0**	**820**	**100.0**	**125,410**	**100.0**

Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the Jackson MSA assessment area. Adequate performance in low- and moderate-income geographies supports this conclusion. As seen in the following table, CBM's lending in low-income census tracts is similar to aggregate data, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level rises slightly higher than aggregate data, reflecting an adequate level.

Geographic Distribution of Small Business Loans Jackson MSA Assessment Area						
Tract Income Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	7.3	5.2	37	5.6	1,000	2.0
Moderate						
2024	14.0	10.3	75	11.3	4,455	9.1
Middle						
2024	32.5	32.2	308	46.4	24,249	49.4
Upper						
2024	42.4	49.7	238	35.8	18,576	37.8
NA						
2024	3.9	2.6	6	0.9	840	1.7
Total						
2024	**100.0**	**100.0**	**664**	**100.0**	**49,120**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. An adequate record regarding home mortgage loans outweighs an excellent record regarding small business loans to support this conclusion.

Home Mortgage Loans
The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Jackson MSA assessment area. Adequate performance to low- and moderate-income borrowers supports this conclusion. As seen in the following table, the bank's lending to low-income borrowers slightly trails aggregate data by 1.4 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank's lending level falls 3.1 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Jackson MSA Assessment Area						
Borrower Income Level	**% of Families**	**HMDA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2024	21.3	5.2	31	3.8	1,954	1.6
Moderate						
2024	15.3	14.6	94	11.5	9,863	7.9
Middle						
2024	19.3	18.3	119	14.5	15,885	12.7
Upper						
2024	44.1	35.9	327	39.9	68,864	54.9
NA						
2024	0.0	26.1	249	30.4	28,844	23.0
Total						
2024	**100.0**	**100.0**	**820**	**100.0**	**125,410**	**100.0**
Source: 2020 U.S. Census Data; 2024 HMDA Data & Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of borrowers reflects excellent penetration among business customers of different sizes in the Jackson MSA assessment area. Excellent performance to businesses with gross annual revenue of $1 million or less supports this conclusion. The following table shows CBM's lending to businesses with gross annual revenue of $1 million or less rises 24.9 percentage points above the aggregate data, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Jackson MSA Assessment Area						
Gross Revenue Level	**% of Businesses**	**CRA Aggregate % of #**	**#**	**%**	**$(000s)**	**%**
<= $1,000,000						
2024	91.0	48.9	490	73.8	27,141	55.3
> $1,000,000						
2024	1.9	--	70	10.5	13,292	27.1
Revenue Not Available						
2024	7.0	--	104	15.7	8,687	17.7
Total						
2024	**100.0**	**100.0**	**664**	**100.0**	**49,120**	**100.0**
Source: 2020 U.S. Census Data; 2024 CRA Data & Aggregate Data; "- -" data not available. Due to rounding, totals may not equal 100.0 percent.						

Community Development Loans

The institution has made an adequate level of CD loans in the Jackson MSA assessment area. As noted under the rated area level, CBM originated 20 CD loans totaling approximately $36.0 million in the Jackson MSA assessment area. By dollar volume, this equates to 28.1 percent of the bank's total CD lending in the State of Mississippi compared to the 37.5 percent of the rated area's total loans attributed to this assessment area. Adequate CD loan responsiveness is evidenced by CD activity benefiting three of the four categories of CD.

The following point lists an example of a CD loan in the Jackson MSA assessment area:

- ***Economic Development –*** The bank originated a $4.0 million loan to construct a new convenience store and gas station, which will create at least three full-time jobs for low- and moderate-income individuals in the area.

INVESTMENT TEST

CBM demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments and adequate responsiveness to CD needs support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Jackson MSA assessment area. The table for the State of Mississippi shows that CBM made 100 qualified investments totaling approximately $12.5 million in the Jackson MSA assessment area. By dollar volume, this equates to 34.6 of the State of Mississippi's total adequate level of qualified investments compared to 36.1 percent of total rated area's deposits attributed to this assessment area.

The following lists an example of a qualified investment in the Jackson MSA assessment area:

- ***Affordable Housing*** – The bank invested $1.0 million in a bond to purchase a 96-unit apartment complex managed by the local Regional Housing Authority. The apartment is exclusively offered to low- and moderate-income families with rents below market rates.

Responsiveness to Credit and Community Development Needs

CBM exhibits adequate responsiveness to credit and CD needs in the Jackson MSA assessment area. As noted in the investment table for the State of Mississippi, the Jackson MSA assessment area shows adequate responsiveness to CD needs by primarily addressing affordable housing and revitalization and stabilization efforts.

Community Development Initiatives

CBM does not use innovative or complex investments to support CD initiatives in the Jackson MSA assessment area.

SERVICE TEST

CBM demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Service Test. The limited accessibility of delivery systems, changes in branch locations, and reasonableness of hours and services combined with a leader level of CD services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the Jackson MSA assessment area. The Jackson MSA assessment area reflects an inconsistent conclusion to the institution's Accessibility of Delivery System performance, falling below the overall level. As seen in the following table, CBM's lack of branches and ATMs in low-income census tracts falls 8.9 percentage points below the population in these tracts, reflecting poor performance. In moderate-income census tracts, the bank's level of branches falls 7.2 percentage points below the population percentage, also reflecting poor performance. Furthermore, the bank's level of ATMs in moderate-income census tracts falls below the population percentage in these tracts by 9.5 percentage points, reflecting a poor level.

Branch and ATM Distribution by Geography Income Level
Jackson MSA Assessment Area

Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	19	13.8	46,610	8.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	27	19.6	89,803	17.2	1	10.0	1	7.7	0	0.0	0	0.0
Middle	44	31.9	183,711	35.2	4	40.0	6	46.2	0	0.0	0	0.0
Upper	46	33.3	199,783	38.3	5	50.0	6	46.2	1	100.0	0	0.0
NA	2	1.5	2,001	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**138**	**100.0**	**521,908**	**100.0**	**10**	**100.0**	**13**	**100.0**	**1**	**100.0**	**0**	**100.0**

Source: 2020 U.S. Census Data; Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative delivery systems offered in the Jackson MSA assessment area remain consistent with those discussed at the institution level. Refer to the institution Service Test section for details.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the Jackson MSA has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch opened in an upper-income census tract, and no branches closed in the Jackson MSA assessment area since the prior evaluation.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the Jackson MSA assessment area, particularly low- or moderate-income geographies or individuals. The Jackson MSA assessment area reflects product offerings, services, and branch hours consistent with the institution overall.

Community Development Services

The institution is a leader in providing CD services in the Jackson MSA assessment area. The table in the State of Mississippi section shows that the bank provided 349 CD services since the previous evaluation in the Jackson MSA assessment area. The current level represents 35.5 percent of total leader level of CD services in this rated area compared to this assessment area containing 26.3 percent of the rated area's total branches. This figure reflects a notable increase from the 148 CD services provided at the prior evaluation.

The following lists an example of a CD service in the Jackson MSA assessment area:

- ***Affordable Housing*** **–** The bank partnered with MS Housing Partnership to provide financial education training sessions to individuals as part of the bank's Community Credit program targeted to low- and moderate-income individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Biloxi MSA	Consistent	Consistent	Consistent
Hattiesburg MSA	Consistent	Above	Consistent

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of CBM's operations and activities. The demographic data for the limited-scope assessment areas is in the appendices.

Biloxi MSA Assessment Area

The Biloxi MSA assessment area consists of all of Hancock, Harrison, and Jackson counties. CBM operates eight branches in this assessment area, two in moderate-income census tracts, three in middle-income census tracts, two in upper-income census tracts, and one in a census tract with no income designation. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000s)
Home Mortgage Loans	397	78,170
Small Business Loans	264	24,954
CD Loans	19	30,709
Investments	133	4,477
CD Services	261	--
Source: Bank Data.		

Hattiesburg MSA Assessment Area

The bank's Hattiesburg MSA assessment area consists of all of Forrest and Lamar counties. CBM operates two branches in moderate-income census tracts in this assessment area. This distribution of branches rises above the institution's overall conclusion. The availability of alternative delivery systems demonstrated consistent performance with the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000s)
Home Mortgage Loans	161	30,649
Small Business Loans	67	6,950
CD Loans	10	7,909
Investments	32	5,557
CD Services	38	--
Source: Bank Data.		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2024
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	$	% 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	
Biloxi MSA	397	78,170	71.2	10,032	3.1	4.8	2.2	13.0	15.6	13.7	41.6	36.5	40.3	39.4	40.8	42.5	3.0	2.3	1.3	
Hattiesburg MSA	161	30,649	28.9	3,300	0.0	0.0	0.0	18.2	26.7	18.3	35.7	32.9	36.3	43.5	36.0	44.3	2.7	4.4	1.1	
Total	**558**	**108,819**	**100.0**	**13,332**	**2.3**	**3.4**	**1.7**	**14.2**	**18.8**	**14.8**	**40.2**	**35.5**	**39.3**	**40.3**	**39.4**	**43.0**	**2.9**	**2.9**	**1.3**	
Source: 2020 U.S. Census Data; 2024 HMDA & Aggregate Data. Due to rounding, totals may not equal 100.0.																				

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2024
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income census tracts			
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Biloxi MSA	264	24,954	79.8	7,810	7.2	3.8	5.1	16.0	15.5	15.4	38.7	37.1	39.9	35.4	39.0	36.6	2.8	4.6	3.0	
Hattiesburg MSA	67	6,950	20.2	2,773	0.0	0.0	0.0	30.5	23.9	25.0	30.4	29.9	30.3	34.2	37.3	40.9	4.9	9.0	3.9	
Total	**331**	**31,904**	**100.0**	**10,583**	**5.1**	**3.0**	**3.8**	**20.2**	**17.2**	**17.9**	**36.3**	**35.7**	**37.4**	**35.0**	**38.7**	**37.7**	**3.4**	**5.4**	**3.2**	
Source: 2020 U.S. Census Data; 2024 CRA & Aggregate Data. Due to rounding, totals may not equal 100.0.																				

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2024
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Biloxi MSA	397	78,170	71.2	10,032	22.7	3.8	4.8	16.2	10.1	14.5	18.8	13.6	20.3	42.3	42.8	35.9	0.0	29.7	24.5	
Hattiesburg MSA	161	30,649	28.9	3,300	23.0	2.5	4.4	15.1	11.8	13.2	19.6	16.2	18.9	42.3	42.2	38.2	0.0	27.3	25.3	
Total	**558**	**108,819**	**100.0**	**13,332**	**22.8**	**3.4**	**4.7**	**15.9**	**10.6**	**14.2**	**19.0**	**14.3**	**20.0**	**42.3**	**42.7**	**36.5**	**0.0**	**29.0**	**24.7**	
Source: 2020 U.S. Census Data; 2024 HMDA & Aggregate Data. Due to rounding, totals may not equal 100.0.																				

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Biloxi MSA	264	24,954	79.8	7,810	90.2	61.4	52.4	1.3	21.6	8.6	17.1
Hattiesburg MSA	67	6,950	20.2	2,773	89.3	67.2	49.3	2.1	11.9	8.7	20.9
Total	**331**	**31,904**	**100.0**	**10,583**	**89.9**	**62.5**	**51.6**	**1.5**	**19.6**	**8.6**	**17.8**
Source: 2020 U.S. Census Data; 2024 CRA & Aggregate Data. Due to rounding, totals may not equal 100.0.											

APPENDICES

LARGE 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) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
    i. The proportion of the bank's lending in the bank's assessment area(s);
    ii. The dispersion of lending in the bank's assessment areas(s); and
    iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
    i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
    ii. Small business and small farm loans to businesses and farms with gross annual revenues of $1 million or less;
    iii. Small business and small farm loans by loan amount at origination; and
    iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

1) The dollar amount of qualified investments;
2) The innovativeness or complexity of qualified investments;
3) The responsiveness of qualified investments to available opportunities; and
4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.,* RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

1) The extent to which the bank provides community development services; and
2) The innovativeness and responsiveness of community development services.

SCOPE OF EVALUATION

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Alabama	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Florida	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Memphis Multi-State MSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Mississippi	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

ALABAMA

Birmingham MSA Assessment Area

The Birmingham MSA assessment area consists of all of Jefferson and Shelby counties. According to 2020 U.S. Census Data, the assessment area's 244 census tracts reflect the following income designations: 24 low-, 58 moderate-, 74 middle-, and 81 upper-income census tracts as well as 7 census tracts with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area
Birmingham MSA Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	244	9.8	23.8	30.3	33.2	2.9
Population by Geography	897,745	7.0	19.7	31.4	40.4	1.5
Housing Units by Geography	396,915	9.1	23.1	30.4	36.1	1.5
Owner-Occupied Units by Geography	231,755	4.5	18.0	32.4	44.3	0.8
Occupied Rental Units by Geography	112,802	14.7	29.8	28.2	24.8	2.5
Vacant Units by Geography	52,358	16.9	31.2	26.1	23.9	2.0
Businesses by Geography	103,240	6.6	16.2	29.1	47.0	1.2
Farms by Geography	632	2.4	7.8	35.3	54.0	0.6
Family Distribution by Income Level	220,596	21.0	16.2	18.2	44.7	0.0
Household Distribution by Income Level	344,557	24.4	15.2	16.7	43.8	0.0
Median Family Income MSA - 13820 Birmingham, AL MSA		$74,058	Median Housing Value			$ 196,662
			Median Gross Rent			$944
			Families Below Poverty Level			9.4%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to the FDIC Deposit Market Share report as of June 30, 2025, 41 financial institutions operated 231 offices within this assessment area. Of these institutions, CBM ranked 27th with a 0.3 percent deposit market share.

Based on 2024 HMDA data, the bank originated 99 reportable home mortgage loans totaling approximately $31.1 million in the Birmingham MSA assessment area. CBM captured 0.4 percent market share of the total number and a 0.5 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 53th out of 488 total lenders, which is in the top 10.9 of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 23 reportable small business loans totaling approximately $5.9 million in the Birmingham MSA assessment area. CBM captured 0.1 percent market share of the total number of small business loans and a 0.6 percent market share of the total dollar volume of loans. The bank's activity ranks 55th out of 124 total lenders, which lands the bank in the top 44.4 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Mobile MSA Assessment Area

The Mobile MSA assessment area consists of all of Mobile County. According to 2020 U.S. Census Data, the assessment area's 135 census tracts reflect the following income designations: 9 low-, 42 moderate-, 48 middle-, and 33 upper-income census tracts as well as 3 census tracts with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area Mobile MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	135	6.7	31.1	35.6	24.4	2.2
Population by Geography	414,809	3.4	25.7	41.6	28.5	0.8
Housing Units by Geography	184,321	4.0	28.1	40.3	27.3	0.3
Owner-Occupied Units by Geography	100,955	2.1	20.7	44.2	32.7	0.3
Occupied Rental Units by Geography	56,602	6.1	38.4	35.6	19.4	0.4
Vacant Units by Geography	26,764	6.8	33.9	35.2	23.6	0.5
Businesses by Geography	42,467	4.1	27.0	35.1	33.6	0.2
Farms by Geography	317	2.2	12.3	47.3	38.2	0.0
Family Distribution by Income Level	102,767	21.9	17.6	19.9	40.6	0.0
Household Distribution by Income Level	157,557	25.8	15.3	17.0	41.8	0.0
Median Family Income MSA - 33660 Mobile, AL MSA		$61,747	Median Housing Value			$ 140,207
			Median Gross Rent			$852
			Families Below Poverty Level			13.1%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to the FDIC Deposit Market Share report as of June 30, 2025, 25 financial institutions operated 105 offices within this AA. Of these institutions, CBM ranked 15th with a 1.1 percent deposit market share.

Based on 2024 HMDA data, the bank originated 138 reportable home mortgage loans totaling approximately $24.7 million in the Mobile MSA assessment area. CBM captured 1.6 percent market share of the total number and a 1.4 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 18th out of 360 total lenders, which is in the top 5.0 of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 49 reportable small business loans totaling approximately $6.8 million in the Mobile MSA assessment area. CBM captured 0.6 percent market share of the total number of small business loans and a 1.4 percent market share of the total dollar volume of loans. The bank's activity ranks 29th out of 92 total lenders, which lands the bank in the top 31.5 percent of lenders, considering the total number and dollar amount of loans made by each institution.

FLORIDA

Panama City MSA Assessment Area

The Panama City MSA assessment area consists of all of Bay County. According to 2020 U.S. Census Data, the assessment area's 50 census tracts reflect the following income designations: 1 low-, 10 moderate-, 25 middle-, and 13 upper-income census tracts as well as 1 census tract with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area
Panama City MSA Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	50	2.0	20.0	50.0	26.0	2.0
Population by Geography	175,216	2.3	16.9	51.8	29.0	0.0
Housing Units by Geography	104,060	1.9	14.3	56.9	26.9	0.0
Owner-Occupied Units by Geography	49,474	1.6	15.5	49.2	33.8	0.0
Occupied Rental Units by Geography	24,062	3.3	22.2	54.3	20.2	0.0
Vacant Units by Geography	30,524	1.1	6.2	71.6	21.1	0.0
Businesses by Geography	29,699	2.3	14.7	52.8	30.3	0.0
Farms by Geography	160	0.6	15.6	48.1	35.6	0.0
Family Distribution by Income Level	47,432	17.4	18.2	21.7	42.7	0.0
Household Distribution by Income Level	73,536	21.3	15.7	19.8	43.2	0.0
Median Family Income MSA - 37460 Panama City-Panama City Beach, FL MSA		$65,996	Median Housing Value			$ 203,088
			Median Gross Rent			$1,115
			Families Below Poverty Level			8.9%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to the FDIC Deposit Market Share report as of June 30, 2025, 18 financial institutions operated 50 offices within this assessment area. Of these institutions, CBM ranked 9th with a 2.6 percent deposit market share.

Based on 2024 HMDA data, the bank originated 66 reportable home mortgage loans totaling approximately $20.0 million in the Panama MSA assessment area. CBM captured 1.0 percent market share of the total number and a 0.8 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 21st out of 469 total lenders, which is in the top 4.5 of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 19 reportable small business loans totaling approximately $3.7 million in the Panama MSA assessment area. CBM captured 0.3 percent market share of the total number of small business loans and a 1.8 percent market share of the total dollar volume of loans. The bank's activity ranks 25th out of 82 total lenders, which lands the bank in the top 30.4 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Pensacola MSA Assessment Area

The Pensacola MSA assessment area consists of all of Escambia County. According to 2020 U.S. Census Data, the assessment area's 79 census tracts reflect the following income designations: 7 low-, 24 moderate-, 31 middle-, and 16 upper-income census tracts as well as 1 census tract with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area Pensacola MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	79	8.9	30.4	39.2	20.3	1.3
Population by Geography	321,905	6.0	29.5	44.5	20.0	0.0
Housing Units by Geography	142,456	6.1	30.8	40.5	22.6	0.0
Owner-Occupied Units by Geography	76,772	4.7	26.9	42.6	25.8	0.0
Occupied Rental Units by Geography	45,397	8.8	38.0	42.3	10.9	0.0
Vacant Units by Geography	20,287	5.5	29.2	28.6	36.7	0.0
Businesses by Geography	47,803	5.7	28.2	38.7	27.4	0.0
Farms by Geography	322	2.2	16.5	59.9	21.4	0.0
Family Distribution by Income Level	74,083	22.5	20.0	21.1	36.5	0.0
Household Distribution by Income Level	122,169	25.1	18.9	19.1	36.9	0.0
Median Family Income MSA - 37860 Pensacola-Ferry Pass-Brent, FL MSA		$71,094	Median Housing Value			$ 166,728
			Median Gross Rent			$1,025
			Families Below Poverty Level			9.7%
Source: 2020 U.S. Census Data 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 100.0 percent.						

According to the FDIC Deposit Market Share report as of June 30, 2025, 18 financial institutions operated 49 offices within this assessment area. Of these institutions, CBM ranked 17th with a 0.4 percent deposit market share.

Based on 2024 HMDA data, the bank originated 21 reportable home mortgage loans totaling approximately $4.9 million in the Pensacola MSA assessment area. CBM captured 0.2 percent market share of the total number and a 0.2 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 69th out of 417 total lenders, which is in the top 16.5 of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 6 reportable small business loans totaling approximately $2.2 million in the Pensacola MSA assessment area. CBM captured 0.1 percent market share of the total number of small business loans and a 0.7 percent market share of the total dollar volume of loans. The bank's activity ranks 52nd out of 110 total lenders, which lands the bank in the top 47.3 percent of lenders, considering the total number and dollar amount of loans made by each institution.

MISSISSIPPI

Biloxi MSA Assessment Area

The Biloxi MSA assessment area consists of all of Hancock, Harrison, and Jackson counties. According to 2020 U.S. Census Data, the assessment area's 143 census tracts reflect the following income designations: 10 low-, 23 moderate-, 57 middle-, and 45 upper-income census tracts as well as 8 census tracts with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area Biloxi MSA Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**N/A* % of #**
Geographies (Census Tracts)	143	7.0	16.1	39.9	31.5	5.6
Population by Geography	397,926	6.1	16.1	41.1	34.7	2.0
Housing Units by Geography	181,991	6.6	16.7	41.3	32.1	3.4
Owner-Occupied Units by Geography	101,941	3.1	13.0	41.6	39.4	3.0
Occupied Rental Units by Geography	53,528	12.5	23.8	38.1	21.8	3.9
Vacant Units by Geography	26,522	8.0	16.7	46.6	24.7	4.0
Businesses by Geography	31,816	7.2	16.0	38.7	35.4	2.8
Farms by Geography	250	2.4	9.2	47.2	40.0	1.2
Family Distribution by Income Level	103,094	22.7	16.2	18.8	42.3	0.0
Household Distribution by Income Level	155,469	24.9	15.2	17.9	42.0	0.0
Median Family Income MSA - 25060 Gulfport-Biloxi, MS MSA		$62,967	Median Housing Value			$ 151,058
			Median Gross Rent			$890
			Families Below Poverty Level			13.8%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to the FDIC Deposit Market Share report as of June 30, 2025, 15 financial institutions operated 103 offices within this assessment area. Of these institutions, CBM ranked 5th with a 7.3 percent deposit market share.

Based on 2024 HMDA data, the bank originated 397 reportable home mortgage loans totaling approximately $78.2 million in the Biloxi MSA assessment area. CBM captured 4.0 percent market share of the total number and a 3.6 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 7th out of 339 total lenders, which is in the top 2.1 of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 264 reportable small business loans totaling approximately $25.0 million in the Biloxi MSA assessment area. CBM captured 3.4 percent market share of the total number of small business loans and an 8.1 percent market share of the total dollar volume of loans. The bank's activity ranks 11th out of 100 total lenders, which lands the bank in the top 11.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Hattiesburg MSA Assessment Area

The Hattiesburg MSA assessment area consists of all of Forrest and Lamar counties. According to 2020 U.S. Census Data, the assessment area's 38 census tracts reflect the following income designations: 12 moderate-, 13 middle-, and 10 upper-income census tracts as well as 3 census tracts with no income designation. The assessment area was part of major disaster declarations by FEMA during the review period. The following table includes certain demographic data for this assessment area.

Demographic Information of the Assessment Area
Hattiesburg MSA Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	38	0.0	31.6	34.2	26.3	7.9
Population by Geography	142,380	0.0	28.4	31.5	35.1	5.1
Housing Units by Geography	57,789	0.0	29.8	31.6	32.9	5.8
Owner-Occupied Units by Geography	31,478	0.0	18.2	35.7	43.5	2.7
Occupied Rental Units by Geography	19,105	0.0	44.3	25.8	20.1	9.8
Vacant Units by Geography	7,206	0.0	41.7	29.5	20.2	8.5
Businesses by Geography	13,094	0.0	30.5	30.4	34.2	4.9
Farms by Geography	218	0.0	12.4	39.9	45.9	1.8
Family Distribution by Income Level	33,903	23.0	15.1	19.6	42.3	0.0
Household Distribution by Income Level	50,583	27.4	13.1	17.7	41.9	0.0
Median Family Income MSA - 25620 Hattiesburg, MS MSA		$60,673	Median Housing Value			$ 138,157
			Median Gross Rent			$786
			Families Below Poverty Level			16.1%

Source: 2020 U.S. Census Data 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 100.0 percent.

According to the FDIC Deposit Market Share report as of June 30, 2025, 19 financial institutions operated 55 offices within this assessment area. Of these institutions, CBM ranked 7th with a 5.2 percent deposit market share.

Based on 2024 HMDA data, the bank originated 161 reportable home mortgage loans totaling approximately $30.6 million in the Hattiesburg MSA assessment area. CBM captured 4.9 percent market share of the total number and a 4.7 percent market share of the total dollar volume of home mortgage loans. This volume of activity ranks the bank 3rd out of 193 total lenders, which is in the top 1.6 percent of lenders, considering the total number and dollar amount of loans made by each institution.

Based on 2024 CRA data, the bank originated 67 reportable small business loans totaling approximately $7.0 million in the Hattiesburg MSA assessment area. CBM captured 2.4 percent market share of the total number of small business loans and a 5.1 percent market share of the total dollar volume of loans. The bank's activity ranks 12th out of 75 total lenders, which lands the bank in the top 16.0 percent of lenders, considering the total number and dollar amount of loans made by each institution.

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. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank 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 bank:

(i) Has not been reported or collected by the bank or an affiliate for consideration in the bank'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 bank's assessment area(s) or a broader statewide or regional area including the bank'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 bank'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 (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a 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 (for example, 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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.