



PUBLIC DISCLOSURE

December 10, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cullman Savings Bank
Charter Number 704877

316 2nd Ave SW
Cullman, AL 35055-4117

Office of the Comptroller of the Currency
Birmingham Field Office
3595 Grandview Parkway
Suite 655
Birmingham, AL 35243

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, 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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Overall CRA Rating

This institution is rated Satisfactory.
The Lending Test is rated Satisfactory.

We based this assessment on the following:

- The level and trend of the loan-to-deposit ratio is more than reasonable given the Bank's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the Bank's loans are inside its AA.
- The Bank has an overall reasonable penetration of loans among borrowers of different income levels and businesses of different sizes in the Cullman County AA.
- The Bank has a reasonable dispersion of loans among census tracts of different income levels.
- The Bank did not receive any Community Reinvestment Act (CRA) consumer complaints during the review period.

Definitions and Common Abbreviations

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

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

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

Description of Institution

Cullman Savings Bank (CSB or Bank) is owned by Cullman Bancorp Incorporated, a one-bank holding company. At December 31, 2017, CSB had total assets of \$283 million. The December 31, 2017 Tier 1 capital is \$41.46 million or 14.78 percent. CSB is an intrastate bank headquartered in Cullman, AL. The city of Cullman is located in Cullman County, AL. The last CRA evaluation, dated March 10, 2014, determined a Satisfactory CRA rating. In addition to the main branch office, CSB has three full-service branch locations, in Cullman County AL. CSB has four 24-hour accessible ATM's that adjoin each branch location. The Bank has not opened any additional branches since the last CRA evaluation. The Bank's primary focus continues to be 1-4 family residential real estate loans. There are no legal or financial impediments to CSB's ability to meet the credit needs in its assessment area (AA).

The table below provides details regarding CSB's branch and ATM locations by census tract (CT) Income level.

Distribution of Bank Offices and ATMs by Census Tract						
Census Tract Income Level	Tracts		Full-Service Branches		Automated Teller Machines	
	#	%	#	%	#	%
Low	0	0.00%	0	0.00%	0	0.00%
Moderate	0	0.00%	0	0.00%	0	0.00%
Middle	16	88.89%	3	75.00%	3	75.00%
Upper	2	11.11%	1	25.00%	1	25.00%
TOTAL	18	100.00%	4	100.00%	4	100.00%

CSB provides a wide-range of traditional deposit and loan products. The main office is located in an area that is accessible to persons from different areas of the community. Lobby and drive-up hours are the same at each branch location and help to meet customer needs during the week.

Customers have 24-hour access to their accounts via telephone and Internet. Telephone banking services include access to deposit and loan balance information and transfers between CSB accounts. Internet banking services include retail online banking, access to deposit and loan balance information, transfers between CSB accounts, bill payment, and check images.

CSB net loans as a percentage of total assets is 78.57 percent. The following table provides details of the Bank's loan composition as of December 31, 2017.

Loan Portfolio Composition as of December 31, 2017		
Loan Type	Dollar Amount (000's)	Percent of Total Loans
Residential Real Estate Loans	\$203,831	91%
Commercial Loans	\$17,483	8%
Consumer Loans	\$2,151	1%
Agriculture Loans	642	<1%
Total Loans	\$224,107	100%

Source: December 31, 2017 Call Report

CSB has only one AA, made up of Cullman County, AL, a non-Metropolitan Statistical Area (MSA). CSB's AA meets regulatory requirements and consists of complete political subdivisions that do not arbitrarily exclude low- or moderate-income geographies. In addition, CSB has no natural boundaries within its AA that hinder accessibility.

The Cullman County Non-MSA AA consists of 18 census tracts (15 middle-income and 3 upper-income) with a total population of 80,406. As previously stated, CSB has four full-service branches within its AA. At December 31, 2017, three of the branches were located in middle-income tracts and one branch was located in an upper-income tract.

The average median family income for the Cullman County AA in 2017 was \$45,334. The tables in Appendix B show certain demographics of the AA by census tract and income level.

Employers in the Cullman County AA are primarily concentrated in education, medical, retail, and manufacturing. Major employers include Cullman County Schools, Cullman Regional Medical, Wal-Mart Distribution Center and Retail Store, REHAU, State of Alabama, and Topre America Corporation.

Local banking competition in the Cullman County AA is strong. Market leaders include Wells Fargo Bank, Regions Bank, and BBVA Compass. Smaller community peer institutions include Eva Bank, First Community Bank, Merchants Bank, Peoples Bank, Premier Bank of the South, and Traditions Bank. CSB ranked fifth among 12 depository institutions in the AA, with 11.57 percent of the market share.

The AA's current local economy is characterized as good and expanding. Due to growth in the local manufacturing sector, additional employment opportunities are anticipated. As of November 2018, the average unemployment rate for Cullman County was 2.9 percent, compared to 4 percent for Alabama statewide and 4.10 percent for the U.S. The AA has 13 percent of households living below the poverty level. We discussed community-lending needs with the project coordinator of a local development agency who identified residential lending as the most prominent lending need in the AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation is an assessment of CSB's ability to meet the credit needs of its AA. We evaluated CSB using the Small Bank evaluation procedures, which includes a lending test. CSB does not file Home Mortgage Disclosure Act (HMDA) data. As a result, we sampled home and commercial loans to evaluate the Bank's CRA performance.

This performance evaluation starts from the Bank's previous CRA examination date, covering the period from January 1, 2014 through December 31, 2017. CSB's primary loan product over the evaluation period was home loans. We also reviewed small business loans to evaluate the Bank's CRA performance. To evaluate performance under the lending test, we reviewed home mortgage loans originated between January 1, 2015 and December 31, 2017. The sample of home mortgage loans included 20 originated in 2015 or 2016, and an additional 20 home mortgage loans originated in 2017. We also reviewed a sample of 20 small business loans originated during 2015 or 2016, and 20 small business loans originated in 2017.

Data Integrity

Since CSB is a non-HMDA filer, a data integrity examination review was not conducted.

Selection of Areas for Full-Scope Review

Since CSB has only one AA, Cullman County, AL, a non-MSA, that AA received a full-scope review.

Ratings

The Bank's overall rating of Satisfactory is based on the one non-MSA AA. Throughout the evaluation, we gave greater weight to the Bank's record of home lending, as this is its primary product.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

The Bank's CRA performance is satisfactory based on the results of the lending test.

Loan-to-Deposit Ratio

CSB's loan-to-deposit (LTD) ratio is more than reasonable given its size, financial conditions, and AA credit needs. The Bank's LTD ratio averaged 120.61 percent over the 19 quarters since the last CRA examination, with a quarterly low of 113.55 percent and a quarterly high of 125.94 percent. The Bank's LTD compares favorably with other community banks of similar location and product offerings. CSB ranks first among six banks serving the AA.

Institution	Assets as of 3Q18 (in thousands)	Average LTD Ratio
Cullman Savings Bank	\$ 294,861	120.61%
Evabank	\$ 371,803	97.87%
Traditions Bank	\$ 352,234	89.59%
Peoples Bank	\$ 771,954	87.19%
Premier Bank of the South	\$ 192,642	73.71%
Merchants Bank	\$ 293,868	65.01%

Source: UBPR and Call Report Data

Lending in Assessment Area

During the review period, CSB originated a substantial majority of home and small business loans inside the AA. The analysis of home mortgage loans disclosed that the Bank originated 100 percent of both the dollar amount and number of home loans inside the AA. The small business loan sample showed that the Bank originated 95 percent of the number of small business loans inside the AA, and 86.44% by total dollar amount.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	40	100%	0	0.00%	40	\$7,789	100%	\$0	0.00%	\$7,789
Small Business	38	95.00%	2	5.00%	40	\$13,679	86.44%	\$2,145	13.56%	\$15,824

*Source: 01/01/2015-12/31/2017 Bank Data
Due to rounding, totals may not equal 100.0*

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

Refer to Table P and R, in appendix C for the facts and data used to evaluate the borrower distribution of the Bank’s loan originations and purchases.

CSB’s lending to borrowers of different incomes within the Cullman County AA reflects reasonable penetration of home loans to low- and moderate-income borrowers, which meets the standard for satisfactory performance. The Bank’s penetration of small business loans to businesses with annual gross revenues below \$1 million reflects excellent penetration among AA small businesses.

Home Mortgage Loans

The Bank’s distribution of home loans reflects reasonable penetration among AA households of different income levels. For 2015-2016, the percentage of home loans to low-income borrowers, at 3.45 percent, is significantly lower than the percentage of low-income AA families of 18.8 percent. Because 12.8 percent of AA families lived below the poverty level in 2015-2016, this impeded the Bank’s ability to make home loans to qualified low-income borrowers. The percentage of home loans to moderate-income borrowers, at 13.8 percent, is within a reasonable range of the percentage of moderate-income AA families of 16.2 percent.

For 2017, the percentage of home loans to low-income borrowers, at 20 percent, is above the percentage of low-income AA families of 17.6 percent. The percentage of home loans to moderate-income borrowers, at 30 percent, significantly exceeds the percentage of moderate-income AA families of 17.8 percent.

Small Business Loans

The Bank’s distribution of small business loans reflects excellent penetration among small business borrowers with annual gross revenues below \$1 million. For 2015-2016, the percentage of small business loans to borrowers with annual gross revenues below

\$1 million, at 96.55 percent, exceeds the 77.2 percent of small businesses located in the AA. For 2017, the percentage of small business loans to borrowers with annual gross revenues below \$1 million, at 86.22 percent, exceeds the 80.7 percent of small businesses located in the AA. The penetration of loans to small business borrowers with annual gross revenues less than \$1 million was excellent for both 2015/2016 and 2017.

Geographic Distribution of Loans

We did not perform an analysis of the geographic distribution of the Bank's lending as part of this evaluation. The analysis would not be meaningful, as there are very little demographically distinct geographies within the Bank's AA. The AA contains no low or moderate-income census tracts.

Responses to Complaints

The Bank received no CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/15 to 12/31/17	
Financial Institution		Products Reviewed
Cullman Savings Bank (CSB) Cullman, AL		Home mortgage loans and small business loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cullman County, AL, a non-MSA	Full-Scope	See Appendix B

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA Cullman County, AL 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	0.0	83.3	16.7	0.0%
Population by Geography	80,406	0.0	0.0	82.2	17.7	0.0%
Housing Units by Geography	36,889	0.0	0.0	84.1	15.9	0.0%
Owner-Occupied Units by Geography	23,361	0.0	0.0	82.5	17.5	0.0%
Occupied Rental Units by Geography	7,902	0.0	0.0	85.1	14.9	0.0%
Vacant Units by Geography	5,626	0.0	0.0	89.1	10.90	0.0%
Businesses by Geography	3,973	0.0	0.0	75.7	24.3	0.0%
Farms by Geography	245	0.0	0.0	83.3	16.7	0.0%
Family Distribution by Income Level	22,395	18.8	16.2	20.0	45.0	0.0%
Household Distribution by Income Level	31,263	20.6	15.4	17.4	46.6	0.0%
Median Family Income Non-MSAs - AL		\$43,820	Median Housing Value			\$101,950
			Median Gross Rent			\$561
			Families Below Poverty Level			12.8%
<p><i>Source: 2015 ACS Census and 2017 D&B Data</i></p> <p><i>Due to rounding, totals may not equal 100.0</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA Cullman County, AL 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	0.0	83.3	16.7	0.0%
Population by Geography	80,965	0.0	0.0	82.2	17.8	0.0%
Housing Units by Geography	37,103	0.0	0.0	78.8	21.2	0.0%
Owner-Occupied Units by Geography	23,548	0.0	0.0	81.1	18.9	0.0%
Occupied Rental Units by Geography	7,739	0.0	0.0	84.7	15.3	0.0%
Vacant Units by Geography	5,816	0.0	0.0	62.0	38.0	0.0%
Businesses by Geography	4,030	0.0	0.0	73.4	26.6	0.0%
Farms by Geography	239	0.0	0.0	87.9	12.1	0.0%
Family Distribution by Income Level	21,864	17.6	17.8	19.8	44.9	0.0%
Household Distribution by Income Level	31,287	21.8	14.7	18.2	45.3	0.0%
Median Family Income Non-MSAs - AL		\$45,334	Median Housing Value			\$117,204
			Median Gross Rent			\$610
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for 2015/2016 and 2017. For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000's omitted)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA Cullman	20	\$3,545	100	1,999	18.8	3.45	4.7	16.2	13.79	14.5	20.0	31.03	19.5	45.0	51.72	39.5	0.0	0.0	21.9	

*Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000's omitted)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA Cullman	20	\$4,335	100	2,087	17.6	20.0	3.8	17.8	30.0	13.7	19.8	25.0	18.1	44.9	25.0	46.0	0.0	0.0	18.4	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA Cullman	20	\$6,866,838	100%	745	77.2%	96.55%	42.4	5.1%	3.45%	0.0%	0.0%	
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA Cullman	20	\$5,226,125	100%	789	80.7%	86.22%	40.3%	13.1%	13.78%	0.0%	0.0%	
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												