

CRA PUBLIC FILE CONTENTS REQUIREMENT

1. A copy of all written comments received from the public for the current year and each of the of the prior two calendar years that specifically relate to First Fidelity's performance in helping to meet community credit needs, and any response to the comments by First Fidelity, if neither the comments nor the response contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication which would violate specific provisions of law.
2. A copy of the public section of First Fidelity's most recent CRA Performance Evaluation prepared by our federal regulator. This copy will be placed in the public file within 30 business days after its receipt from the regulator.
3. A list of First Fidelity's branches, their street addresses and geographies.
4. A list of branches opened or closed by First Fidelity during the calendar year and each of the prior two calendar years, their street addresses, and geographies.
5. A list of services (including hours of operations, available loan and deposit products, and transaction fees) generally offered at First Fidelity's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. At its option, First Fidelity may include information regarding the availability of alternate systems for delivering retail banking services.
6. A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.
7. Loan to Deposit Ratio for each quarter of the prior calendar year.
8. Any other information the bank chooses.

First Fidelity Bank

CRA Public File

Written comments received from the public specifically related to First Fidelity's performance in relation to helping to meet the community credit needs.

Current Year to Date (as of March 31, 2024): None

Calendar Year 2023: None

Calendar Year 2022: None

PUBLIC DISCLOSURE

August 24, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Fidelity Bank
Certificate Number: 31479**

**1400 Gault Avenue North
Fort Payne, Alabama 35967**

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

10 10th Street, Northeast, Suite 800
Atlanta, Georgia 30309-3849

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

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The bank's overall CRA rating was based on the following conclusions.

- The average net loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area's credit needs.
- A majority of the sampled home mortgage and small business loans reviewed were originated within the assessment area.
- The assessment area does not include any low- or moderate-income census tracts. Therefore, this factor did not affect the lending test rating.
- The borrower profile distribution reflects a reasonable penetration among individuals of different income levels and businesses of different sizes.
- The institution has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the lending test rating.

DESCRIPTION OF INSTITUTION

Established in 1965, First Fidelity Bank is a state-chartered, community bank headquartered in Fort Payne, Alabama. The institution is wholly owned by FBDC Financial Corporation, a one-bank holding company located in Fort Payne, Alabama. First Fidelity Bank has no affiliates or subsidiaries. No merger or acquisition activity has taken place during the evaluation period. At the previous Community Reinvestment Act (CRA) performance evaluation conducted by the FDIC, dated October 27, 2014, the bank received a "Satisfactory" CRA rating using the Small Bank CRA Examination Procedures.

First Fidelity Bank operates three full-service offices with reasonable lobby hours, drive-thru teller facilities, and automated teller machines. The main office and both branches are all located in DeKalb County, which is located in the northeastern portion of Alabama. The main office and branches are located in middle-income census tracts, which have been designated as distressed due to high poverty levels. The bank has not opened or closed any branches since the previous evaluation.

The bank offers retail services to meet the needs of the assessment area. First Fidelity Bank provides a variety of deposit products, including checking, savings, money market, certificates of deposit, and individual retirement accounts. In addition to customers accessing their accounts at its offices, the institution offers internet (www.bankffb.com), mobile, and telephone banking. Other retail services include on-line bill payments, person-to-person payments, direct deposits, overdraft protection, e-statements, wire transfers, and merchant card services. Further, First Fidelity Bank offers a low-cost, non-interest bearing personal checking account, which requires \$100 to open. However, it has no monthly service charges if the average daily balance for the month is at least \$500, otherwise a low-cost minimum balance fee is imposed.

First Fidelity Bank offers a variety of business and consumer credit products that meet the needs of the community. Commercial product offerings include real estate, construction and land development, term, and Small Business Administration (SBA) loans. Commercial lines of credit, credit cards, and letters of credit are also offered. Since the previous evaluation, the bank originated 86 SBA loans totaling \$7.6 million. Consumer product offerings include home mortgage and installment (secured and unsecured) loans, and credit cards. Additionally, to support customers experiencing financial hardship related to the COVID-19 pandemic, First Fidelity Bank offers a Loan Payment Deferral Program and loans through the SBA Paycheck Protection Program. The Loan Payment Deferral Program offers a three-month deferment of loan payments with no deferment fee (although interest continues to accrue at the current note rate) and no late charges assessed during the deferral period. The Paycheck Protection Program is a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll. SBA will forgive loans if all employee retention criteria are met, and the funds are used for eligible expenses.

As of June 30, 2020, First Fidelity Bank reported total assets of \$111.0 million, including total loans of \$53.7 million, and total deposits of \$99.3 million. There have been no material changes to the financial condition of the bank since the previous evaluation, as average growth percentage per year has been 3.7 percent for assets, 6.2 percent for loans, and 3.3 percent for deposits. There are no legal or financial impediments that would impact the bank's performance under the CRA. However, there are some impediments in the economy, which could have impacted the bank's ability to originate loans during the evaluation period. For example, the high poverty rate and the high median housing value in the assessment area could limit the bank's loan volume. Based on the June 30, 2020, Consolidated Reports of Condition and Income (Call Report), the bank's loan portfolio is illustrated in the following table.

Loan Portfolio Distribution as of 6/30/2020		
Loan Category	\$(000s)	%
Construction and Land Development	1,626	3.0
Secured by Farmland	526	1.0
1-4 Family Residential (including lines of credit, 1 st lien, and 2 nd)	26,419	49.2
Multi-family (5 or more) Residential	0	0.0
Commercial Real Estate	7,929	14.8
Total Real Estate Loans	36,500	68.0
Commercial and Industrial	14,603	27.2
Agricultural	194	0.4
Consumer	2,210	4.1
Obligations of States and Political Subdivisions in U.S.	170	0.3
Total Loans (less ALLL)	53,677	100.0
<i>Source: Call Report. Due to rounding, totals may not equal 100.0 percent.</i>		

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The bank-defined area is delineated in accordance with the technical requirements of the CRA regulation and does not arbitrarily exclude any low- and moderate-income census tracts.

First Fidelity Bank’s defined assessment area consists of all of DeKalb, County, Alabama, which is located in a non-Metropolitan Statistical Area (Non-MSA) portion of Alabama. The assessment area (AL Non-MSA AA) includes all 14 census tracts in DeKalb County, Alabama. According to the 2015 American Community Survey (ACS Census), of the 14 census tracts, 12 are located in middle-income and two are located in upper-income census tracts. Although the assessment area has not changed since the previous evaluation, demographics have changed, given the updated data of 2015 ACS, which resulted in a net loss of three moderate-income tracts and the addition of two middle- and one upper-income census tracts. As such, there are no low- or moderate-income geographies within DeKalb County, Alabama.

During the evaluation timeframe with the exception of 2019, all 12 middle-income tracts included in the bank’s assessment area have been designated as distressed tracts due to high poverty levels. There is a 14.0 percent poverty level inside the assessment area.

ECONOMIC AND DEMOGRAPHIC DATA

The following table presents demographic information from the 2015 ACS Census and 2019 Dun and Bradstreet (D&B Data).

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	0.0	85.7	14.3	0.0
Population by Geography	71,068	0.0	0.0	88.1	11.9	0.0
Housing Units by Geography	31,058	0.0	0.0	89.0	11.0	0.0
Owner-Occupied Units by Geography	18,322	0.0	0.0	86.1	13.9	0.0
Occupied Rental Units by Geography	6,691	0.0	0.0	95.4	4.6	0.0
Vacant Units by Geography	6,045	0.0	0.0	90.9	9.1	0.0
Businesses by Geography	3,263	0.0	0.0	83.4	16.6	0.0
Farms by Geography	225	0.0	0.0	89.3	10.7	0.0
Family Distribution by Income Level	17,607	19.0	18.0	23.0	40.0	0.0
Household Distribution by Income Level	25,013	22.3	16.0	17.1	44.6	0.0
Median Family Income Non-MSAs AL (99999)		\$45,454	Median Housing Value		\$99,805	
			Median Gross Rent		\$550	
			Families Below Poverty Level		14.0%	

Source: 2015 ACS Census and 2019 D&B Data. Due to rounding, totals may not equal 100.0 percent. ()The NA category consists of geographies (census tracts) that have not been assigned an income classification.*

As shown in the previous table, the 2015 ACS Census and 2019 D&B data shows the majority of the owner-occupied housing units and businesses were located in distressed middle-income census tracts. According to the 2015 ACS, there were 31,058 housing units in the AL Non-MSA AA. Of the housing units, 59.0 percent were owner-occupied, 21.5 percent were occupied rental units, and 19.5 percent were vacant. Additionally, according to 2019 D&B data, there were 3,263 businesses in the AL Non-MSA AA. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units, and compares small business loans to the distribution of businesses.

The analysis of the small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue (GAR) level. According to 2019 D&B data, of the 3,263 businesses, 82.2 percent had GARs of \$1.0 million or less; 5.6 percent had more than \$1.0 million; and 12.2 percent had unknown revenues. The FFIEC-updated median family income (MFI) levels are used to analyze home mortgage loans under the Borrower Profile criterion. Based on these estimates, the low-, moderate-, middle-, and upper-income categories for 2019 are presented in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
AL NA Median Family Income (99999)				
2019 (\$49,700)	<\$24,850	\$24,850 to <\$39,760	\$39,760 to <\$59,640	≥\$59,640
<i>Source: FFIEC</i>				

During the evaluation timeframe, the population growth rate for the assessment area has been nominal. Also, the median home price has generally increased while the median household income has reflected a nominal increase in the area. During the evaluation timeframe, the unemployment rate in the assessment area generally decreased until 2020. The DeKalb County’s unemployment rate was slightly higher than the State of Alabama and the United States averages in 2017. However, DeKalb County continues to experience levels below the State of Alabama and United States averages since then.

Unemployment Rates				
Area	2017	2018	2019	May 2020
	%	%	%	%
DeKalb County	4.5	3.8	2.8	7.1
Alabama	4.4	3.9	3.0	9.2
United States	4.4	3.9	3.7	13.0
<i>Source: Bureau of Labor Statistics</i>				

The top industries in the assessment area are manufacturing, services, and retail trade. Major employers in DeKalb County are: The Children’s Place; Koch Foods, Inc.; Heil Environmental; Renfro Corporation; Rainsville Technology, Inc. (RTI); GH Metal Solutions, Inc.; GameTime (Playcore); Plasman Corporation, LLC; Vulcraft, Inc. (NUCOR); and Polymer Engineering.

COMPETITION

Competition from financial institutions operating in the assessment area may also have impacted the bank’s CRA performance. As of the June 30, 2019 Deposit Market Share Report, there are 10 institutions operating within the AL Non-MSA AA. These institutions had 26 offices and held \$914.0 million in FDIC-insured deposits. Ranked by deposits, First Fidelity Bank was fifth holding 9.9 percent of the deposit market share. Other banks holding over a 10.0 percent market share include Regions Bank (21.4 percent), First State Bank of DeKalb County (16.5 percent), BBVA USA (12.9 percent), and First Southern State Bank (10.8 percent). These institutions held 61.6 percent of the total FDIC-insured deposits. In addition, as noted by 2018 Home Mortgage Disclosure Act (HMDA) and CRA aggregate data, competition for home mortgage and small business loans is also high in the assessment area.

COMMUNITY CONTACT

As part of the evaluation process, examiners contact third parties that are active in a bank's assessment area, or rely on recent contacts, to identify the credit needs of the community. This information helps determine whether local financial institutions are responsive to these needs. During this evaluation, one existing economic development organization was utilized.

The contact was not aware of any primary credit needs in the area. However, the contact stated that affordable childcare is needed for single-parent families. Additionally, the contact stated that maintaining continuous employment is a challenge due to a lack of affordable childcare. The contact informed the interviewer that the primary demographics of the area are elderly and low-income individuals. The contact also stated that there are not a lot of vacant houses in the area. Although there is more income-based housing being built, those vacancies are filled quickly. Overall, the contact indicated that financial institutions have been responsive to the credit needs of the area.

CREDIT NEEDS

Based on the demographic information and economic data, several conclusions regarding the credit needs of the assessment area can be derived. First, the relatively high number of low- and moderate-income families at 19.0 percent and 18.0 percent, respectively, indicates a continued need for affordable housing. This need is further magnified given that 14.0 percent of the families have incomes below the poverty level. The median housing value is also high by comparison at \$99,805. Second, the significant percentage of businesses with GARs \$1.0 million or less at 82.2 percent, the large number of businesses with four or fewer employees at 60.7 percent, and the percent of businesses operating from a single location at 88.5 percent, reflects a need for small business loans. Third, based on demographic data, the high median age of housing stock averaging 38 years in the assessment area suggests a need for home improvement loans.

SCOPE OF EVALUATION

GENERAL INFORMATION

This evaluation covers the period from October 27, 2014, to the current evaluation dated August 24, 2020. Examiners used the Small Bank CRA Examination Procedures to evaluate First Fidelity Bank's CRA performance. These procedures include the lending test as described in the Appendices. The bank's assessment area was reviewed using full-scope procedures.

ACTIVITIES REVIEWED

A review of the institution's Call Report, dated June 30, 2020, as shown in the loan portfolio table on page 2, reflected home mortgage loans (i.e., 1-4 family residential) represented the largest loan category at 49.2 percent of total loans and business loans (i.e., loans secured by non-farm, non-residential properties; and commercial and industrial) represented the second largest loan category at 42.0 percent of total loans. Farm loans (i.e., secured by farmland and

agricultural) at 1.4 percent were not reviewed due to the low volume of such originations compared to the other two aforementioned categories.

For this evaluation, loan distribution analyses were conducted on the bank's 2019 home mortgage and small business loans, which is representative of the bank's activity and focus since the previous evaluation. Based on the similar activity, home mortgage and small business loans received equal weight in this evaluation.

First Fidelity Bank is not subject to HMDA and is, therefore, not required to collect and report certain data concerning applications for home mortgage loans. During 2019, bank records reflect First Fidelity Bank originated a universe of 35 home mortgage loans totaling \$4.3 million and all 35 loans were utilized to evaluate the bank's performance. The percentage of owner-occupied housing units by geography and the percentage of families by income level (ACS Census) were used for comparison purposes.

The universe of small business loans originated by the bank from January 1, 2019 through December 31, 2019 totaled 42 for \$7.3 million. All 42 loans were utilized to evaluate the bank's performance. D&B data for 2019 was used for comparison purposes.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

First Fidelity Bank demonstrated satisfactory performance under the lending test. The loan-to-deposit ratio, assessment area concentration, and borrower profile distribution performance support this conclusion.

Loan-to-Deposit Ratio

The average net loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area's credit needs. The net LTD ratio for the previous 23 quarters averaged 49.3 percent. This ratio is calculated on a net basis, excluding loan loss reserves and unearned income. Since the previous evaluation, the LTD ratio has ranged from a low of 46.3 percent as of March 31, 2019, to a high of its current 53.4 percent as of June 30, 2020. The LTD ratio has fluctuated, with no specific trends.

Similarly-situated institutions (SSIs) are used for comparison. A SSI will share similar attributes such as size, branch network, product lines, and assessment area. Examiners identified four SSIs. The average net LTD ratios for these SSIs over the same 23 quarters are shown in the following table. The bank's LTD ratio is reasonable when compared to the SSIs. Refer to the table below for additional details.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2020 \$(000s)	Average Net LTD Ratio (%)
Liberty Bank	160,000	59.4
First State Bank of DeKalb	223,500	60.4
First Bank of Boaz	279,800	34.3
The Southern Bank Company	103,600	71.7

Source: Call Reports 12/31/2014 through 6/30/2020

Assessment Area Concentration

A majority of the sampled loans reviewed were originated inside First Fidelity Bank’s assessment area. The following table reveals that a majority of the home mortgage loans at 82.9 percent, and small business loans, at 73.8 percent, by number, were originated inside the bank’s assessment area. This performance indicates First Fidelity Bank’s willingness to serve the credit needs of its assessment area.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	29	82.9	6	17.1	35	3,514	82.1	765	17.9	4,279
Small Business	31	73.8	11	26.2	42	5,738	79.1	1,516	20.9	7,254

Source: 2019 Bank Records. Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

The borrower profile distribution reflects a reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

The distribution of borrowers, with regard to the sampled home mortgage loans, reflects a reasonable penetration among borrowers of different income levels. Lending performance to low-income borrowers at 20.7 percent was better than the percent of low-income families, especially when families below the poverty level at 14.0 percent are considered. Lending to moderate-income borrowers at 17.2 percent was comparable to demographic data at 18.0 percent. Refer to the table below for additional details.

Borrower Profile Distribution of Home Mortgage Loans					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	19.0	6	20.7	243	6.9
Moderate	18.0	5	17.2	532	15.1
Middle	23.0	4	13.8	716	20.4
Upper	40.0	14	48.3	2,023	57.6
Income Not Available	0.0	0	0.0	0	0.0
Totals	100.0	29	100.0	3,514	100.0

Source: 2015 ACS Census; 2019 Bank Records. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

The distribution of borrowers, with regard to the sampled small business loans, reflects a reasonable penetration among businesses of different sizes. The bank originated 77.4 percent of the small business loans to businesses with GARs of \$1.0 million or less. This performance was generally comparable to the demographic data at 82.2 percent. Refer to the following table for additional details.

Borrower Profile Distribution of Small Business Loans					
GAR Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	82.2	24	77.4	3,359	58.5
>1,000,000	5.6	7	22.6	2,379	41.5
Revenue Not Available	12.2	0	0.0	0	0.0
Totals	100.0	31	100.0	5,738	100.0

Source: 2019 D&B Data; 2019 Bank Records. Due to rounding, totals may not equal 100.0 percent.

Geographic Distribution

The assessment area does not include any low- or moderate-income census tracts. Therefore, geographic distribution performance is not included.

Response to Complaints

The bank has not received any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the lending test rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

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.

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 CRA requirements.

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.

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 Metropolitan Statistical Areas are the two categories of CBSAs.

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

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

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

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 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.

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.

First Fidelity Branch Office Listing

The following are First Fidelity Bank's branch office location by street address and geography. A listing of services provided by the branches, hours of operation and fees charged are found on the attached pages.

Main Office: 1400 Gault Avenue North
Fort Payne, Alabama 35967
Located in Census Tract 9611.00

Rainsville Branch: 960 Main Street West
Rainsville, Alabama 35986
Located in Census Tract 9603.03

Ider Branch: 10838 Alabama Highway 75
Ider, Alabama 35981
Located in Census Tract 9601.02

First Fidelity has not opened any new branches since 1989 and has not closed any branches during the current year or for calendar years 2023 and 2022.

SERVICES PROVIDED AT THE FORT PAYNE MAIN OFFICE

The following are the services provided at the Main Office of First Fidelity Bank. The main office is located at 1400 Gault Avenue North in Fort Payne, Alabama. The mailing address of the Main Office is P.O. Box 680378, Fort Payne, Alabama 35968.

LOANS:	Savings Loans Consumer Loans Real Estate Loans Commercial Loans (Includes SBA loans) Letters and Lines of Credit Farm Loans
CHECKING ACCOUNTS:	Regular and Super NOW Accounts Money Market Demand Accounts (MMDA)
SAVINGS ACCOUNTS:	Statement Savings Individual Retirement Account (IRA) Certificates of Deposit (CDs)
OTHER SERVICES:	Safety Deposit Box Rental Bank Checks VISA Debit Cards – Personal and Business Direct Teller Applications for VISA Credit Cards Savings Bond Redemption Wire Transfers – Domestic and International Drive Through Window and Lobby Service ATM – All Office Locations Internet Banking & Bill Pay Mobile Banking/E-Banking 24 Hour Telephone Banking E-Statements Direct Deposit Merchant Credit and Debit Card Services Notary Public Night Depository ACH Origination Remote Deposit Capture Federal Tax Deposits Foreign Currency Exchange Account Research Cash Advances

HOURS OF OPERATION: 8:30 AM until 4:00 PM Monday through Thursday. (Lobby and Drive Through Window)

8:30 AM until 4:30 PM on Friday. (Lobby and Drive Through Window)

Closed on Saturday.

Closed on Sunday and Most Federal Holidays. (Holiday closings will be posted in advance)

TRANSACTION FEES: See the attached disclosure format for fees That may be imposed on indicated accounts.

SERVICES PROVIDED AT THE RAINSVILLE BRANCH

The following are the services provided at the Rainsville Branch of First Fidelity Bank. The Rainsville Branch is physically located on Alabama Highway 35 West of Rainsville, approximately one-half mile. The mailing address of the branch is First Fidelity Bank, 960 Main Street West, Rainsville, Alabama 35986.

LOANS:	Applications available for loan products
CHECKING ACCOUNTS:	Regular and Super NOW Accounts Money Market Demand Accounts (MMDA)
SAVINGS ACCOUNTS:	Statement Savings Individual Retirement Account (IRA) Certificates of Deposit (CDs)
OTHER SERVICES:	Safety Deposit Box Rental Bank Checks VISA Debit Cards – Personal and Business Direct Teller Applications for VISA Credit Cards Savings Bond Redemption Wire Transfers – Domestic and International Drive Through Window and Lobby Service ATM – All Office Locations Internet Banking & Bill Pay Mobile Banking/E-Banking 24 Hour Telephone Banking E-Statements Direct Deposit Merchant Credit and Debit Card Services Night Depository ACH Origination Remote Deposit Capture Federal Tax Deposits Account Research Cash Advances

HOURS OF OPERATION: 8:30 AM until 4:00 PM Monday through Thursday. (Lobby and Drive Through Window)

8:30 AM until 4:30 PM on Friday. (Lobby and Drive Through Window)

Closed on Saturday.

Closed on Sunday and Most Federal Holidays. (Holiday closings will be posted in advance)

TRANSACTION FEES: See the attached disclosure format for fees That may be imposed on indicated accounts.

SERVICES PROVIDED AT THE IDER BRANCH

The following are the services provided at the Ider Branch of First Fidelity Bank. The Ider Branch is physically located at the intersection of Alabama Highway 75 and 117 at Ider, Alabama. The mailing address of the branch is First Fidelity Bank, P.O. Box 430, Ider, Alabama 35981.

LOANS:	Applications available for loan products
CHECKING ACCOUNTS:	Regular and Super NOW Accounts Money Market Demand Accounts (MMDA)
SAVINGS ACCOUNTS:	Statement Savings Individual Retirement Account (IRA) Certificates of Deposit (CDs)
OTHER SERVICES:	Safety Deposit Box Rental Bank Checks VISA Debit Cards – Personal and Business Direct Teller Applications for VISA Credit Cards Savings Bond Redemption Wire Transfers – Domestic and International Drive Through Window and Lobby Service ATM – All Office Locations Internet Banking & Bill Pay Mobile Banking/E-Banking 24 Hour Telephone Banking E-Statements Direct Deposit Merchant Credit and Debit Card Services Night Depository ACH Origination Remote Deposit Capture Federal Tax Deposits Account Research Cash Advances

HOURS OF OPERATION: 8:30 AM until 4:00 PM Monday through Thursday. (Lobby and Drive Through Window)

8:30 AM until 4:30 PM on Friday. (Lobby and Drive Through Window)

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TRANSACTION FEES: See the attached disclosure format for fees That may be imposed on indicated accounts.

FEE SCHEDULE

**FIRST FIDELITY BANK
1400 GAULT AVE N
FORT PAYNE, Alabama 35967**

FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

Account Activity Printout per page (maximum of \$3)	\$1.00
Account Balancing per hour (staff assisted)	\$15.00
Account Closeout Fee (closed within 180 days of opening)	\$10.00
Account Research Fee per hour	\$25.00
Cashier/Official Bank Checks	\$4.00
Copy of Canceled Checks/Check Images per check	\$2.00
Counter Checks (up to 8)	\$2.00
Debit Card Replacement Fee	\$5.00
Deposited Items Returned Fee	\$3.00
Dormant Fee	\$3.00
Duplicate Account Statement per page (maximum of \$3)	\$1.00
Excessive Withdrawal Fee-savings and money market accounts (per withdrawal over 6 per month)	\$1.00
Fax Services per page	\$1.00
Faxed Statements per statement	\$2.00
Garnishments and Levies	\$50.00
Non-Sufficient Funds (NSF) Return Fee	\$27.00
Overdraft Paid Fee	\$25.00
Photocopies per page (customer)	\$0.25
Photocopies per page (non-customer)	\$0.50
Safe Deposit Box Drilling (at cost)	
Safe Deposit Box Lost Key (at cost)	
Safe Deposit Box Rental Fee (varies by size)	
Social Security Card Cashing Fee (staff assisted)	\$4.00
Stop Payment Fee	\$25.00
Telephone Transfer Fee (staff assisted)	\$2.00
Wire Transfer Fee-incoming domestic	\$12.00
Wire Transfer Fee-incoming international	\$12.00
Wire Transfer Fee-outgoing domestic	\$15.00
Wire Transfer Fee-outgoing international	\$35.00

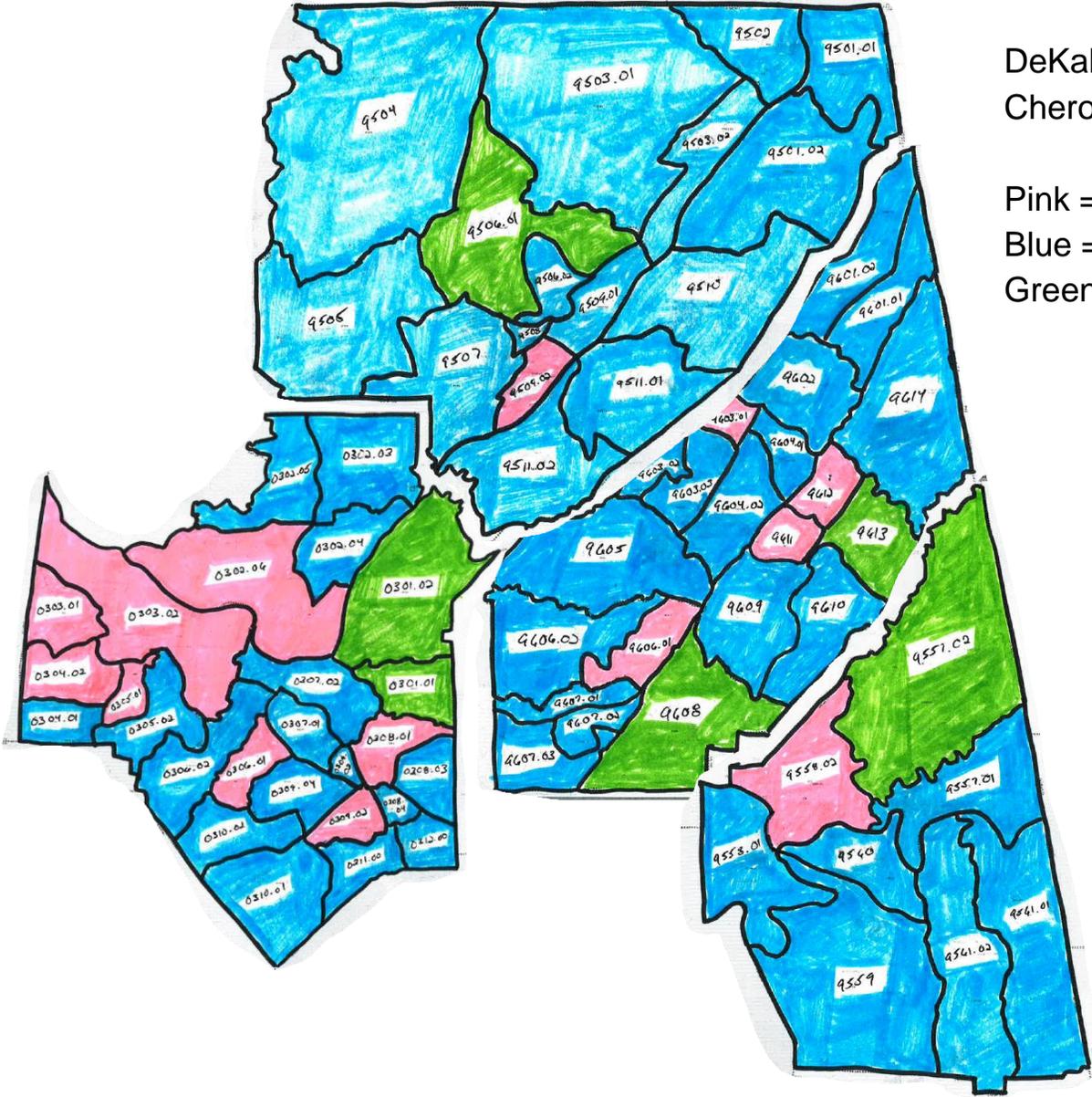
Additional fees or charges may apply based on the type account you hold. These fees or charges were disclosed at account opening on existing accounts and will be disclosed on new accounts at the time of account opening.



CRA Assessment Area

DeKalb County, Jackson County,
Cherokee County, Marshall County

Pink = Upper Income
Blue = Middle Income
Green = Moderate Income



**First Fidelity Bank
Fort Payne, Alabama**

LOAN TO DEPOSIT RATIO CALENDAR YEAR 2023

First Quarter (1 Jan – 31 Mar)	UBPR Data	=	51.44%
Second Quarter (1 Apr – 30 Jun)	UBPR Data	=	48.67%
Third Quarter (1 Jul – 30 Sep)	UBPR Data	=	47.97%
Fourth Quarter (1 Oct – 31 Dec)	UBPR Data	=	48.17%

Note: Loan and deposit numbers used in calculations are taken from the quarterly UBPR, Liquidity Funding Ratios or quarterly Call Report, Schedule RC-Balance Sheet. Total loans are net of the allowance.