

Century Bank & Trust
Community Reinvestment Act
Public File

The Community Reinvestment Act (CRA) encourages banks to help meet the needs of the communities in which they do business, including low- and moderate-income neighborhoods.

Century Bank & Trust is proud to receive Satisfactory ratings in our CRA evaluations.

Information in the CRA Public File is updated each year as of April 1st.

The CRA File contains the following information:

- Branch Locations and Hours of Operations
- Assessment Areas including census tracts
- Products and Services
- Loan to Deposit Ratios
- CRA Performance Evaluation
- Public Comments, if applicable
- Branches Opened or Closed the last two years, if applicable

List of Branches and Hours of Operation

Main Office

141 South Wayne Street

P. O. Box 768

Milledgeville, Georgia 31061

478-453-3571

Northside Office

1800 North Columbia Street

Milledgeville, Georgia 31061

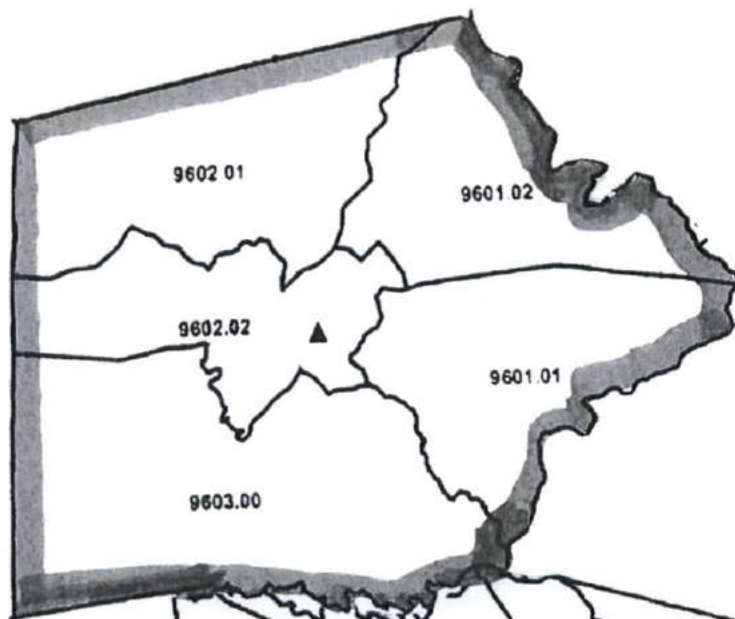
Lobby Hours

9:00 A.M. to 5:00 P.M. Monday through Friday

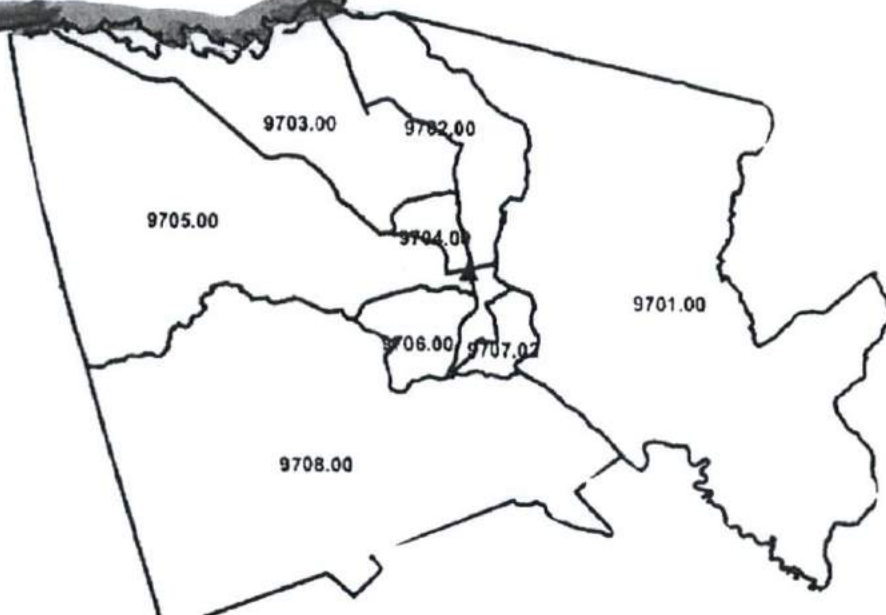
Drive In Hours

8:30 A.M. to 5:00 P.M. Monday through Friday

Putnam



Baldwin



2020 FFIEC Census Report - Summary Census Demographic Information

State: 13 - GEORGIA (GA)

County: 237 - PUTNAM COUNTY

Tract: All Tracts



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2020 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2020 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
13	237	9601.01	Middle	No	115.62	\$51,800	\$59,891	\$53,056	3213	11.24	361	1033	2133
13	237	9601.02	Upper	No	163.82	\$51,800	\$84,859	\$75,174	5496	18.61	1023	1792	3418
13	237	9602.01	Middle	No	104.72	\$51,800	\$54,245	\$48,056	1147	43.24	496	362	661
13	237	9602.02	Middle	No	92.67	\$51,800	\$48,003	\$42,524	7126	72.28	5151	1667	3128
13	237	9603.00	Upper	No	129.29	\$51,800	\$66,972	\$59,328	4265	8.09	345	1351	2851
13	237	9999.99	Upper	No	121.14	\$51,800	\$62,751	\$55,587	21247	34.72	7376	6205	12191

* Will automatically be included in the 2021 Distressed or Underserved Tract List

2020 FFIEC Census Report - Summary Census Demographic Information

State: 13 - GEORGIA (GA)

County: 009 - BALDWIN COUNTY

Tract: All Tracts



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2020 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2020 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
13	009	9701.00	Upper	No	124.72	\$51,800	\$64,605	\$57,232	5214	36.54	1905	1572	2527
13	009	9702.00	Upper	No	136.33	\$51,800	\$70,619	\$62,557	6524	43.36	2829	1295	3134
13	009	9703.00	Upper	No	147.63	\$51,800	\$76,472	\$67,746	6361	46.49	2957	1532	2655
13	009	9704.00	Middle	Yes*	108.36	\$51,800	\$56,130	\$49,726	4926	49.63	2445	918	1785
13	009	9705.00	Middle	Yes*	87.47	\$51,800	\$45,309	\$40,139	6391	38.99	2492	679	1432
13	009	9706.00	Moderate	No	57.15	\$51,800	\$29,604	\$26,224	3651	64.89	2369	702	1786
13	009	9707.01	Moderate	No	58.84	\$51,800	\$30,479	\$27,000	2985	67.77	2023	189	979
13	009	9707.02	Middle	Yes*	81.31	\$51,800	\$42,119	\$37,313	2325	59.70	1388	311	849
13	009	9708.00	Middle	Yes*	83.91	\$51,800	\$43,465	\$38,504	7418	38.60	2863	1489	2633

* Will automatically be included in the 2021 Distressed or Underserved Tract List



KASASA CASH CHECKING

Enjoy high interest earnings and refunds on ATM withdrawal fees.*

Kasasa Cash® checking is free checking that pays — earn up to **3.50% APY*** every month just for doing banking basics that you probably already do, like using your debit card.

You'll also get refunds on ATM withdrawal fees, nationwide — so every ATM is your ATM, whether you're in Milledgeville or elsewhere. Link your account to a Kasasa Saver® to make saving simple.

DETAILS

- Free checking plus really high interest
 - 3.50% APY* on balances up to \$24,999.99
 - 3.50% to 0.90% APY on balances over \$24,999.99 depending on the daily balance in account*
 - 0.05% APY* if qualifications aren't met
- Refunds on ATM withdrawal fees, nationwide (unlimited)*
- Link to Kasasa Saver to build savings automatically
- No minimum balance to earn rewards
- No monthly service fee
- Free online banking
- Free mobile banking with mobile deposit
- Free eStatement
- Free online bill payment available
- Unlimited check writing
- \$50 minimum deposit to open

Don't forget to open your Kasasa Saver account to maximize your rewards!

EARNING YOUR REWARDS IS EASY!

All that stands between you and your rewards are things you probably do anyway. To earn your rewards, just do the following transactions and activities in your Kasasa Cash account during each Monthly Qualification Cycle:

- Have at least 12 debit card purchases post and settle
- Be enrolled in online banking
- Be enrolled in and agree to receive eStatements

That's all there is to it! And even if you don't meet your qualifications during the month, your Kasasa Cash account is still free — and you'll still earn our base rate of interest. Plus, you can get right back to earning your full rewards the very next month.

*Account transactions and activities may take one or more business days to post and settle to the account and all must do so during the Monthly Qualification Cycle in order to qualify for the account's rewards. The following activities do not count toward earning account rewards: ATM-processed transactions, transfers between accounts, debit card purchases processed by merchants and received by Century Bank and Trust as ATM transactions, and purchases made with debit cards not issued by our Bank. Transactions bundled together by merchants and received by our institution as a single transaction count as a single transaction for the purpose of earning account rewards. "Monthly Qualification Cycle" means a period beginning one (1) business day prior to the first day of the current monthly statement cycle through one (1) business day prior to the close of the current monthly statement cycle. If the first day of the month that is a business day falls on a Friday, a weekend or on a Monday that is not a business day, then the Monthly Qualification Cycle means a period beginning one (1) Business Day prior to the first day of the current Monthly Statement Cycle through two (2) Business Days prior to the close of the current Monthly Statement Cycle.

When your Kasasa Cash account qualifications are met during a Monthly Qualification Cycle, daily balances up to \$24,999.99 receive an APY of 3.50%; and daily balances over \$24,999.99 earn 0.25% interest rate on the portion of the daily balance over \$24,999.99, resulting in a range from 3.50% to 0.90% APY depending on the account's daily balance (assuming an average balance of \$125,000.) You will receive reimbursements for domestic ATM fees incurred during the Monthly Qualification Cycle in which you qualified. An ATM receipt must be presented within 60 days of transaction for reimbursements of individual ATM fees of \$5.00 or higher. When Kasasa Cash qualifications are not met, all balances in the account earn .05% APY and ATM fees are not refunded. Interest and ATM fee reimbursements will be credited to your Kasasa Cash account on the last day of the monthly statement cycle. APY = Annual Percentage Yield. APYs are accurate as of 04/03/23. Rates and rewards are variable and may change at our discretion after account is opened without notice to you. Account approval, conditions, qualifications, limits, timeframes, enrollments and other requirements apply. \$50 minimum deposit is required to open the account. At least 12 debit card transactions and enrollment electronic services (e.g. online banking, electronic statements) are required to meet some of the account's qualifications. Limit one account per Social Security Number. There are no recurring monthly service charges or fees to open or close this account. Contact a Century Bank and Trust service representative for additional information, details, restrictions, processing limitations and enrollment instructions. Member FDIC.



KASASA CASH BACK CHECKING

Enjoy cash back on debit card purchases and refunds on ATM withdrawal fees.*

Kasasa Cash Back® pays you to go shopping — get **2.50% cash back** on your everyday debit card purchases up to **\$90** per year (\$7.50 per month).*

You'll also get refunds on ATM withdrawal fees, nationwide — so you can get to your money anywhere, anytime. Link your account to a Kasasa Saver® to make saving effortless.

DETAILS

- Free checking that pays you back
- 2.50% cash back on debit card purchases*
 - Cash back earned on up to \$300 in purchases monthly
 - Earn up to \$90 cash back per year, \$7.50 per month
- Refunds on ATM withdrawal fees, nationwide (unlimited)*
- Link to Kasasa Saver to build savings automatically
- No minimum balance to earn rewards
- No monthly service fee
- Free online banking
- Free mobile banking with mobile deposit
- Free eStatement
- Free online bill payment available
- Unlimited check writing
- \$50 minimum deposit to open

Don't forget to open your Kasasa Saver to maximize your rewards!

EARNING YOUR REWARDS IS EASY!

All that stands between you and your rewards are things you probably do anyway. To earn your rewards, just do the following transactions and activities in your Kasasa Cash Back account during each Monthly Qualification Cycle:

- Have at least 12 debit card purchases post and settle
- Be enrolled in online banking
- Be enrolled in and agree to receive eStatements

See? No biggie. And even if you don't meet your monthly qualifications, your Kasasa Cash Back account is still free. Plus, you can get right back to earning your rewards the very next month.

*Account transactions and activities may take one or more business days to post and settle to the account and all must do so during the Monthly Qualification Cycle in order to qualify for the account's rewards. The following activities do not count toward earning account rewards: ATM-processed transactions, transfers between accounts, debit card purchases processed by merchants and received by Century Bank and Trust as ATM transactions, and purchases made with debit cards not issued by our Bank. Transactions bundled together by merchants and received by our institution as a single transaction count as a single transaction for the purpose of earning account rewards. "Monthly Qualification Cycle" means a period beginning one (1) business day prior to the first day of the current statement cycle through one (1) business day prior to the close of the current statement cycle. If the first day of the month that is a business day falls on a Friday, a weekend or on a Monday that is not a business day, then the Monthly Qualification Cycle means a period beginning one (1) Business Day prior to the first day of the current Monthly Statement Cycle through two (2) Business Days prior to the close of the current Monthly Statement Cycle.

When Kasasa Cash Back qualifications are met during a Monthly Qualification Cycle, you will receive (1) 2.50% cash back on up to a total of \$300.00 debit card purchases that post and settle to the account during that cycle period. A maximum of \$7.50 cash back may be earned per Monthly Qualification Cycle. When Kasasa Cash Back qualifications are not met no cash back payments are made and ATM fees are not refunded. You will receive reimbursements for domestic ATM fees incurred during the Monthly Qualification Cycle in which you qualified. An ATM receipt must be presented within 60 days of transaction for reimbursements of individual ATM fees of \$5.00 or higher. Kasasa Cash Back payments will be credited to your Kasasa Cash Back account on the last day of Statement Cycle. Rates and rewards are variable and may change at our discretion after account is opened without notice to you. Account approval, conditions, qualifications, limits, timeframes, enrollments and other requirements apply. \$50 minimum deposit is required to open the account. At least 12 debit card transactions and enrollment electronic services (e.g. online banking, electronic statements) are required to meet some of the account's qualifications. Limit one account per Social Security Number. There are no recurring monthly service charges or fees to open or close this account. Contact a Century Bank and Trust service representative for additional information, details, restrictions, processing limitations and enrollment instructions. Member FDIC.



KASASA SAVER

Build savings automatically while earning a high rate of return.

Kasasa Saver® makes saving simple — it links to your Kasasa Cash® or Kasasa Cash Back® checking to help you build your savings every month.

When you earn cash rewards in your Kasasa® checking, those earnings transfer into Kasasa Saver. Plus, Kasasa Saver pays up to **1.25% APY!*** That's Kasasa at Century Bank & Trust —accounts that reward you for keeping your money local with us.

DETAILS

- Links to Kasasa Cash or Kasasa Cash Back checking
- Automatic transfers of Kasasa Cash or Kasasa Cash Back earnings
- 1.25% APY* on daily balances up to \$24,999.99
- 1.25% to 0.45% APY on daily balances over \$24,999.99 depending on daily balance in account*
- 0.05% APY* if qualifications are not met on Kasasa Cash or Kasasa Cash Back
- No monthly service fee
- No minimum balance to earn rewards
- Free online banking
- Free mobile banking
- Free eStatements
- \$50 minimum deposit to open
- The first six in person transfers from this account to another account in the bank or cash withdrawals are free. There is a \$5 excessive withdrawal (w/d) service charge for each exceeding six during the month.
- The first six transfers to another account or to third parties by preauthorized, automatic, telephone, computer, or check, draft or debit card are free. There will be a \$5 Excess MMD transaction charge for each debit exceeding six during the month.

EARNING YOUR REWARDS IS EASY!

Qualifying for your Kasasa Cash or Kasasa Cash Back account automatically qualifies you for the highest Kasasa Saver rate too. To earn your rewards, just do the following transactions and activities in your Kasasa Cash or Kasasa Cash Back account during each Monthly Qualification Cycle:

- Have at least 12 debit card purchases post and settle
- Be enrolled in online banking

- Be enrolled in and agree to receive eStatements

What's it! And even if you don't meet your qualifications during the month, your Kasasa® accounts are still free — and you'll still earn our base rate of interest on Kasasa Saver. Plus, you can get right back to earning your full rewards the very next month.

Kasasa Cash (Stand Alone): When your Kasasa Cash account qualifications are met during a monthly qualification cycle, (1) daily balances up to \$24,999.99 receive APY of 3.50%; (2) daily balances over \$24,999.99 earn 0.25% interest rate on the portion of daily balance over \$24,999.99, resulting in a range from 3.50% to 0.90% APY depending on the account's balance (Assuming an average balance of \$125,000). (3) you will receive reimbursements for nationwide ATM fees incurred during the qualification cycle. Interest and ATM fee reimbursements will be credited to your Kasasa Cash account on the last day of the current statement cycle. When Kasasa Cash qualifications are not met, all balances in the account earn 0.05% and ATM refunds are not made. Minimum to open is \$50.00. APYs accurate as of 04/01/23. Rates and rewards are variable and may change after account is opened. Qualifying transactions must post to and settle account during monthly qualification cycle. Transactions may take one or more business days from the date transaction was made to post to and settle to the account. "Monthly Qualification Cycle" means a period beginning one day prior to the first day of the current statement cycle through one day prior to the close of the current statement cycle. If the first day of the month that is a business day falls on a Friday, a weekend or on a Monday that is not a business day, then the Monthly Qualification Cycle means a period beginning one (1) Business Day prior to the first day of the current Monthly Statement Cycle through two (2) Business Days prior to the close of the current Monthly Statement Cycle.

ATM processed transactions do not count towards qualifying debit card transactions. An ATM receipt must be presented within sixty (60) calendar days of transaction for reimbursements of individual ATM fees of \$5.00 or higher. Fees may reduce earnings. APY = Annual Percentage Yield. Limit one account per Social Security Number.

Kasasa Cash Linked To Kasasa Saver: When your Kasasa Cash account qualifications are met during a monthly qualification cycle, (1) daily balances up to \$24,999.99 receive a non-compounding APY* of 3.50%; (2) daily balances over \$24,999.99 earn 0.25% interest rate on the portion of daily balance over \$24,999.99, resulting in a non-compounding range from 3.50% to 0.90% APY* depending on the account's daily balance (Assuming an average balance of \$125,000.) (3) you will receive reimbursements for nationwide ATM fees incurred during the qualification cycle. Interest and ATM fee reimbursements will be credited to your Kasasa Cash account on the last day of the current monthly statement cycle and are automatically transferred to the linked Kasasa Saver account within one day. When Kasasa Cash qualifications are not met, all balances in Kasasa Cash earn a non-compounding APY* of 0.05% and ATM fee refunds are not made. Minimum to open is \$50.00. APYs accurate as of 04/01/23. Rates and rewards are variable and may change at our discretion after account is opened without notice to you. Qualifying transactions must post to and settle account during monthly qualification cycle. Transactions may take one or more business days from the date transaction was made to post to and settle account. "Monthly Qualification Cycle" means a period beginning one day prior to the first day of the current statement cycle through one day prior to the close of the current statement cycle. If the first day of the month that is a business day falls on a Friday, a weekend or on a Monday that is not a business day, then the Monthly Qualification Cycle means a period beginning one (1) Business Day prior to the first day of the current Monthly Statement Cycle through two (2) Business Days prior to the close of the current Monthly Statement Cycle.

ATM processed transactions, transfers between accounts, debit card purchases processed by merchants and received at our bank as ATM transactions, and purchases made with debit cards not issued by our bank, do not count towards qualifying debit card transactions. An ATM receipt must be presented within sixty (60) calendar days of transaction for reimbursements of individual ATM fees of \$5.00 or higher. Fees may reduce earnings. APY = Annual Percentage Yield. Limit one account per Social Security Number. *The interest earned within the Kasasa Cash account does not compound since it is automatically transferred to the Kasasa Saver account. Automatic transfer may cause an overdraft to your Kasasa Cash account. Account approval, qualifications and rules apply. Contact institution for details. Member FDIC.

Century Bank & Trust

Non-Kasasa Consumer Deposit Accounts

Regular Checking Account

- Minimum to open is \$50
- Unlimited debits (paper or electronic)
- A \$5.50 balance fee (in the service charge) will be imposed each month if the balance falls below \$500 any day of the statement cycle.
- A \$10 service charge will be charged for accounts closed within 6 months of the opening date.

NOW Personal Checking Account*

This is an interest bearing checking account. The rate of interest is determined by the average monthly balance.

- Minimum to open is \$1,000
- No minimum balance to earn interest
- Tiered rate structure
- Unlimited debits
- A \$7.50 balance fee (in service charge) will be imposed each month if the balance falls below \$1,000 any day of the statement cycle.
- A \$10 service charge will be charged for accounts closed within 6 months of the opening date.

Money Market Account*

This is an interest bearing checking account with limited transactions. The rate of interest is determined by the average monthly balance.

- Minimum to open is \$2,500
- No minimum balance to earn interest
- Tiered rate structure
- A \$7.50 balance fee (in the service charge) will be imposed each month if the balance falls below \$2,500 any day of the statement cycle.
- In Person transfers from this account to another account in the bank or cash withdrawals are unlimited.
- The first six transfers to another account or to third parties by preauthorized, automatic, telephone, computer, mobile device or by check, draft, debit card or similar order are free. There will be a \$5 Excess MMD transaction charge for each debit exceeding six during the month.
- A \$10 service charge will be charged for accounts closed within 6 months of the opening date.

Regular Savings Account*

- Minimum to open is \$50
- No minimum balance to earn interest
- A \$5 balance fee (in the service charge) will be imposed each month if the balance falls below \$200 any day of the month.
- The first six in-person transfers from this account to another account in the bank or cash withdrawals are free. There is a \$5 excessive withdrawal (W/D) service charge for each withdrawal over six per month.
- The first six transfers to another account or to third parties by preauthorized, automatic, telephone, computer, mobile device or by check, draft, debit card or similar order are free. There will be a \$5 Excess MMD transaction charge for each debit exceeding six during the month.
- A \$10 service charge will be charged for accounts closed within 6 months of the opening date.

Minor Savings Account*

- Available for children under the age of 18
- Minimum to open is \$50
- No minimum balance to maintain
- No minimum balance to earn interest
- The first two in-person transfers from this account to another account in the bank or cash withdrawals are free. There is a \$5 excessive withdrawal (W/D) service charge for each withdrawal over two per month.
- The first six transfers to another account or to third parties by preauthorized, automatic, telephone, computer, mobile device or by check, draft, debit card or similar order are free. There will be a \$5 Excess MMD transaction charge for each debit exceeding six during the month.
- ATM transactions are not permitted
- A \$10 service charge will be charged for accounts closed within 6 months of the opening date.

Christmas Savings Account*

- Automated Savings Plan - Deposits are transferred from an existing account with Century Bank & Trust
- Partial withdrawals or ATM transactions are not permitted
- A check will be mailed for the balance of the account on the first business day of November or deposited into the account that funded the transfers.
- A \$10 service charge will be charged if the account is closed within 6 months of the opening date.



Common Features

(Limits and Fees)

Century Bank and Trust
141 S Wayne Street
Milledgeville, GA 31061
(478) 453-3571

The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Overdraft fee - each overdraft paid	\$32 per item
Imposed on NSF paid items created by checks, in-person withdrawals, ATM withdrawals or other electronic means.	
The maximum number of returned item fees and overdraft fees you may be charged in a day for overdrawing your account is 5 fees or \$160. Please refer to the Terms and Conditions Overdraft Addendum for details regarding these fees.	
Returned Item Fee	\$32 per item
Imposed when checks and items presented by electronic means are returned unpaid.	
The maximum number of returned item fees and overdraft fees you may be charged in a day for overdrawing your account is 5 fees or \$160. Please refer to the Terms and Conditions Overdraft Addendum for details regarding these fees.	
Overdraft Transfer Fee (Sweep)	\$7.50 per day
Imposed on transfers to cover overdrafts created by checks, ACHs, or other electronic means. Transfers do not occur to pre-authorized debit card transactions.	
ODP Advance Fee (ODP LOC)	\$9.95 per day
Imposed on transfers from an overdraft line of credit to cover overdrafts created by checks, ACHs, or other electronic means. Transfers do not occur to pre-authorized debit card transactions.	
Stop Payment Charge	\$32 Each
Stop Payment Charge via Online Banking or Telephone Banking	\$20 Each
Wire Transfer Fee - Domestic Incoming	\$15 Each
Wire Transfer Fee - Domestic Outgoing	\$25 Each
Wire Transfer Fee - International Incoming	\$25 Each
Wire Transfer Fee - International Outgoing	\$50 Each
Cashier's Check	\$7 Each



Counter Items	\$1 per page
Items print 4 to a page. Available for checks and deposit slips.	
Deposited Canadian Item	\$50 per Item
Collection Item Fee - Incoming	\$10 per Item
Collection Item Fee - Outgoing	\$20 per Item
IRA Withdrawal Fee	\$25
This fee is charged when transferring an IRA to another institution.	
Dormant Account Service Charge	\$5 per month up to \$60 per account
The Dormant Account Service Charge is charged after 12 months of inactivity.	
Debit Card Replacement Fee	\$10 per card
Statement Copy Without Check Images	\$2 per Statement
Statement Copy with Check Images	\$5 per Statement
Research/Account Balancing	\$40 per Hour (1hour minimum)
Garnishment	\$75 per Request
Levy/Other Legal Proceeding	\$75 per Request
Safe Deposit Box Annual Rates	2 X 5 - \$15
	3 X 5 - \$21
	3 X 10 - \$42
	5 X 10 - \$65
	10 X 10 - \$105
	11 X 12 - \$120
	15 X 22 - \$240
Safe Deposit Box Replacement Key	15 X 44 - \$480
	\$40 per Key
Safe Deposit Box Drilling	\$275 per Box



Century Bank & Trust

Commercial Deposit Accounts and Schedule of Analysis & Direct Charges

Analyzed Business Checking Account

This account is for large corporations, Money Service Businesses and businesses that have cash needs of more than a \$10,000 weekly average. The minimum deposit to open an account is \$500. The monthly maintenance charge is determined using a commercial analysis system. Analysis charges are calculated based on the account activity. To help offset the analysis charges, an earnings credit is then calculated based on the average collected balance of the account. A maintenance charge will be assessed if the analysis charges are greater than the earnings credit. Direct charges will be deducted from the account regardless of the earnings credit. See Schedule of Analysis & Direct Charges for further details and a complete listing of the charges.

Regular Business Checking Account

This account is for local businesses that do not have large cash needs. The minimum deposit to open is \$250. There is a monthly service charge of \$6.50 and 10¢ debit fee for each debit over 20 if the daily balance falls below \$2,500.

Business Now Checking Account*

This account is for sole proprietorships, governmental units and certain non-profit corporations/organizations. Partnerships, LLC's, and corporations are not eligible.

The minimum deposit to open is \$2,500. There is a monthly service charge of \$7.50 if the daily balance falls below \$2,500. A minimum daily balance of \$2,500 must be maintained to earn interest. The service charge is waived for IOLTA accounts and there is not a minimum to open the account.

Below are the interest rate tiers:

Tier 1 \$	2,500.00 - \$	24,999.99
Tier 2 \$	25,000.00 - \$	49,999.99
Tier 3 \$	50,000.00 - \$	99,999.99
Tier 4 \$	100,000.00 - \$	249,999.99
Tier 5 \$	250,000.00 - \$	499,999.99
Tier 6 \$	500,000.00 - \$	999,999.99
Tier 7	\$1,000,000.00 & over	

*The rate of interest paid is subject to change daily without notice. The assessment of service charges and fees may reduce the APY. Interest on Checking accounts and Money Market accounts is paid on the average daily balance. Interest on Savings accounts is paid on the daily balance.

Money Market Account*

This account is ideal for those who need maximum liquidity and want higher rates of interest than those paid on NOW and savings accounts. The minimum deposit to open an account is \$2,500. There is a monthly maintenance charge of \$7.50 if the daily balance falls below \$2,500. Transfers from this account to another account in the bank or cash withdrawals in person are unlimited. Federal banking regulation limits transfers to another account or to third parties by preauthorized, automatic, telephone, computer or check to six transactions per statement cycle. There will be a \$5 Excess MMD transaction charge for each debit exceeding this limit. Below are the interest rate tiers:

Tier 1 \$	2,500.00 - \$	24,999.99
Tier 2 \$	25,000.00 - \$	49,999.99
Tier 3 \$	50,000.00 - \$	99,999.99
Tier 4 \$	100,000.00 - \$	249,999.99
Tier 5 \$	250,000.00 - \$	499,999.99
Tier 6 \$	500,000.00 - \$	999,999.99
Tier 7	\$1,000,000.00 & over	

Regular Savings Account*

This account is designed for those who want to earn interest but maintain smaller balances. A \$5 service charge will be imposed each month if the balance falls below \$200 any day of the month. In-person transfers from this account to another account in the bank or cash withdrawals are limited to six per month. There is a \$5 service charge for each excessive withdrawal.

Federal banking regulation limits transfers to another account or to third parties by preauthorized, automatic, telephone, computer or check to six transactions per statement cycle. There will be a \$5 Excess MMD transaction charge for each debit exceeding this limit.

Free Internet Banking Service

Century Bank & Trust Online Banking makes frequent trips to the bank a thing of the past. Just think, with only a computer and Internet access, you can:

- ❖ CHECK deposits, balances and check clearing
- ❖ TRANSFER funds between your accounts
- ❖ RECONCILE accounts at any time, without waiting for a monthly statement
- ❖ VIEW your check images online
- ❖ PAY bills online

See a Customer Service Representative for information on ACH origination or Remote Deposit Capture



Common Features

(Limits and Fees)

Century Bank and Trust
141 S Wayne Street
Milledgeville, GA 31061
(478) 453-3571

The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

DIRECT CHARGES FOR NON-ANALYZED BUSINESS ACCOUNTS

Returned Item Fee and/or Overdraft Fee	\$32 per item
Overdraft Transfer Fee (Sweep)	\$7.50 per day
ODP Advance Fee (ODP LOC)	\$9.95 per day
Return Items Charged Back	\$5.00 per Item

DIRECT CHARGES ALL BUSINESS ACCOUNTS

Cashier's Check	\$7 Each
Counter Items	\$1 per page
Items print 4 to a page. Available for checks and deposit slips.	
Deposited Canadian Item	\$50 per Item
Collection Item Fee - Incoming	\$10 per Item
Collection Item Fee - Outgoing	\$20 per Item
Dormant Account Service Charge	\$5 per month up to \$60 per account

The Dormant Account Service Charge is charged after 12 months of inactivity.

Debit Card Replacement Fee	\$10 per card
Statement Copy Without Check Images	\$2 per Statement
Statement Copy with Check Images	\$5 per Statement
Research/Account Balancing	\$40 per Hour (1 hour minimum)
Garnishment	\$75 per Request



Levy/Other Legal Proceeding	\$75 per Request
Safe Deposit Box Annual Rates	2 X 5 - \$15
	3 X 5 - \$21
	3 X 10 - \$42
	5 X 10 - \$65
	10 X 10 - \$105
	11 X 12 - \$120
	15 X 22 - \$240
	15 X 44 - \$480
Safe Deposit Box Replacement Key	\$40 per Key
Safe Deposit Box Drilling	\$275 per Box

ANALYZED CHARGES BUSINESS ACCOUNTS

Earnings Credit**

90% of average collected balance times the 4 week average 90 days Treasury Bill rate.

FDIC Insurance***

\$0.000158333 times ledger balance

** The earnings credit is calculated to help offset analysis charges. Any analysis charges greater than the credit will be charged to the account. Direct charges will be deducted from the account regardless of the credit.

***The rate for FDIC Insurance may change at any time

Monthly Maintenance Fee	\$6.50 per month
Deposits	\$0.25 per deposit
Checks Paid	\$00.12 per item
Return Items Charged Back	\$5.00 per item
Return Items Held for Pickup	\$5.00 per item
Returned Item Fee****	\$32.00 per item
Overdraft Fee****	\$32.00 per item
****NSF Fees (Paid or Returned) will be directly charged to your account if not included in Analysis Fees.	
Coin and Currency Orders	
Wrapped Coins	\$ 1 per \$1,000
Strapped Currency	\$ 1 per \$1,000



ADDITIONAL CHARGES FOR ANALYZED OR NON-ANALYZED BUSINESS
ACCOUNTS

Stop Payment Charge	\$32 each
Stop Payment Charge via Online Banking or Telephone Banking	\$20.00 each
Wire Transfer Fee - Domestic Incoming	\$15 each
Wire Transfer Fee - Domestic Outgoing	\$25 each
Wire Transfer Fee - International Incoming	\$25 each
Wire Transfer Fee - International Outgoing	\$50 each



Century Bank and Trust
Loan Products and Services

REAL ESTATE LOANS

- Home Equity Lines of Credit
- Unimproved and Improved Land Loans
- First Mortgage Loans
- Second Mortgage Loans
- Home Improvement Loans
- Construction and Development Loans
- Loans Secured by Timberland
- Secondary Market Loans
- Adjustable Rate Mortgages

Real Estate Loan Fees

Consumer Real Estate loans fees are:

\$500 - New loans under \$250K & Renewals w/no new money

\$750 - New loans \$250K or more

\$1,000 - New loans \$500K or more

Bridge loans: .50% of loan amount

Construction loan fees are:

0.50% of the loan amount, \$750 minimum.

Secondary market loans fees are:

- either zero origination fee or 1.75% origination fee.

Business Real Estate Loan fees are negotiable

CONSUMER LOANS

- Home Improvement Loans
- Automobile Loans
- Boat Loans
- Recreational Vehicle Loans
- Personal Loans (Secured and Unsecured)
- Personal Lines of Credit
- Loans Secured by Savings Accounts / Certificates of Deposit
- Loans Secured by Stock
- Overdraft Protection Lines of Credit

The standard loan fee for consumer loans is \$250. The minimum loan amount is \$1,000.

COMMERCIAL LOANS

- Secured / Unsecured
- Business Lines of Credit
- Small Business Loans
- Loans to Government Entities
- Letters of Credit

CENTURY BANK AND TRUST

LOAN to DEPOSIT RATIO BY CALENDAR QUARTER

QUARTER ENDED	LOANS	DEPOSITS	Loan To Deposit Ratio
3/31/2023	\$ 179,430,000	\$ 335,282,000	53.52%
6/30/2023	\$ 184,778,000	\$ 325,697,000	56.73%
9/30/2023	\$ 183,713,000	\$ 304,787,000	60.28%
12/31/2023	\$ 184,280,000	\$ 315,725,000	58.37%

PUBLIC DISCLOSURE

November 01, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Century Bank and Trust
Certificate Number: 00147

141 South Wayne Street
Milledgeville, Georgia 31061

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

10 10th Street NE, 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 Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs.
- A majority of the bank's loans are in the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes and individuals of different income levels.
- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test.

DESCRIPTION OF INSTITUTION

Background

Century Bank and Trust (CB&T) is a state-chartered, community bank headquartered in Milledgeville, Baldwin County, Georgia. The bank is a wholly owned subsidiary of Century Bancorp, Inc., a one-bank holding company also located in Milledgeville, Georgia. No merger or acquisition activity has taken place during the evaluation period. At the previous CRA performance evaluation conducted by the FDIC, dated February 8, 2016, the bank received a "Satisfactory" rating using the Interagency Small Institution Examination Procedures.

Operations

CB&T operates two full-service offices located in Milledgeville, Georgia, and one loan production office (LPO) located in Greensboro, Georgia. The bank's offices are located in Baldwin and Greene Counties, which are located in the Georgia Nonmetropolitan Statistical Area (Non-MSA). The two full-service offices are located in Baldwin County and are in distressed middle-income census tracts. The LPO is located in Greene County in an upper-income census tract. The bank has not opened or closed any branches since the previous evaluation.

CB&T offers a variety of products and services to meet the needs of its community. Consumer credit products include installment loans, personal lines of credit, credit cards, and one-to-four family residential mortgages. Commercial credit products include commercial real estate loans, commercial line of credit, business credit cards, equipment loans, and construction loans. In addition, Paycheck Protection Program (PPP) loans were offered in response to the COVID-19 pandemic. PPP loans are guaranteed by the Small Business Administration under the Coronavirus

Aid, Relief, and Economic Security Act. The loans serve to retain jobs that would otherwise be lost due to business closures because of the COVID-19 emergency. Deposit products offered include checking, savings, and money market accounts and certificates of deposit. Alternative banking services include internet banking, mobile banking (including mobile deposit), telephone banking, and two bank-owned automated teller machines.

Ability and Capacity

CB&T's assets totaled \$338.5 million as of the June 30, 2021 Reports of Condition and Income (Call Report). Total loans and total deposits were \$165.2 million and \$304.1 million, respectively. Since the previous evaluation, the loan portfolio composition has remained relatively stable and the bank's major product lines are small business, home secured, and construction, land development, and other land loans. As shown in the following table, business loans (loans secured by nonfarm nonresidential properties and commercial and industrial loans) comprise of 54.8 percent, one-to-four family residential properties comprise 22.7 percent, and loans for constructions and land development comprise of 13.1 percent of the loan portfolio. Similar to the previous evaluation, the bank's primary focus is to originate small business and home mortgage loans for its community.

Loan Portfolio Distribution as of 6/30/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	21,629	13.1
Secured by Farmland	5,665	3.4
Secured by 1-4 Family Residential Properties	37,408	22.7
Secured by Multifamily (5 or more) Residential Properties	7,954	4.8
Secured by Nonfarm Nonresidential Properties	75,046	45.4
Total Real Estate Loans	147,702	89.4
Commercial and Industrial Loans	15,453	9.4
Agricultural Production and Other Loans to Farmers	48	0.3
Consumer Loans	2,514	1.5
Loans to non-depository financial institutions	332	0.2
Other Loans	32	0.2
Less: Any unearned income on loans	-925	-1.0
Total Loans	165,156	100.0

Source: Call Report

The bank provides for the credit needs of its community in a manner consistent with its size, financial condition, resources, and local economic conditions. While examiners did not identify any financial or legal impediments that affect the bank's ability to meet the assessment area's credit needs, several economic and demographic indicators could affect the bank's lending opportunities.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas in which its performance will be evaluated. CB&T operates within one rated area in the Non-MSA of Georgia. Since the previous evaluation, the bank removed Greene County from its assessment area. The bank's

designated assessment area is now comprised of Baldwin and Putman Counties in their entirety. The following section discusses economic and demographic information pertaining to the assessment.

Economic and Demographic Data

The assessment area consists of 14 whole census tracts and does not arbitrarily exclude low- or moderate-income areas. According to the 2015 American Community Survey (ACS) data, there are two moderate-, seven middle-, and five upper-income census tract. All four of the middle-income census tracts in Baldwin County are designated by the Federal Financial Institutions Examination Council (FFIEC) as distressed due to poverty. The following table presents select demographic characters of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	14.3	50.0	35.7	0.0
Population by Geography	67,042	0.0	9.9	48.5	41.6	0.0
Housing Units by Geography	32,953	0.0	8.9	43.6	47.5	0.0
Owner-Occupied Units by Geography	14,892	0.0	6.0	43.4	50.6	0.0
Occupied Rental Units by Geography	9,548	0.0	13.7	49.0	37.3	0.0
Vacant Units by Geography	8,513	0.0	8.5	38.0	53.5	0.0
Businesses by Geography	5,193	0.0	7.0	44.9	48.0	0.0
Farms by Geography	189	0.0	4.8	42.3	52.9	0.0
Family Distribution by Income Level	15,411	21.1	16.9	14.6	47.4	0.0
Household Distribution by Income Level	24,440	25.8	15.6	15.0	43.6	0.0
Median Family Income Non-MSAs - GA		\$45,886	Median Housing Value			\$146,021
			Median Gross Rent			\$684
			Families Below Poverty Level			15.7%
Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.						

The *Geographic Distribution* criterion compares home mortgage loans to the distribution of owner-occupied housing units and small business loans to the businesses located in low-, moderate-, middle-, and upper-income census tracts. As illustrated in the previous table, the assessment area does not have any low-income census tracts and only 7.0 percent of businesses and 6.0 percent of the owner-occupied housing units are located in the moderate-income census tracts. This data indicates limited lending opportunities in moderate-income census tracts. Further, 15.7 percent of families have incomes below the federal poverty level, which poses a challenge for home mortgage lending to low-income families, as these families likely face difficulty in qualifying for a home mortgage loan.

Examiners used FFIEC-updated median family income figures to analyze home mortgage lending under the Borrower Profile criterion. The following table reflects low-, moderate-, middle-, and upper-income categories in the assessment area.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Non-MSA's GA Median Family Income (99999)				
2020 (\$51,800)	<\$25,900	\$25,900 to <\$41,440	\$41,440 to <\$62,160	≥\$62,160
Source: FFIEC				

Based on 2020 Dun & Bradstreet (D&B) data, 5,193 businesses operated in the assessment area. The analysis of small business loans under the *Borrower Profile* criterion compares the distribution of businesses by gross annual revenue level. The following reflects gross annual revenues for these businesses:

- 87.0 percent had \$1.0 million or less,
- 3.1 percent had more than \$1.0 million, and
- 9.9 percent had unknown revenues.

According to D&B data, the assessment area's largest industries include services at 34.2 percent, non-classifiable establishments at 20.8 percent, and retail trade at 13.8 percent. Additionally, the Georgia Department of Labor reports some of the assessment area's major employers for Baldwin County include A W Holdings, LLC; Geo Corrections & Detention, Inc.; Georgia College & State University; and Triumph Aerostructures, LLC. For Putman County, a few of the major employers include AALTO Scientific LTD; Blst Operating Company, LLC; Legacy Housing of Georgia, LLC; and Walmart.

Data obtained from the U.S. Bureau of Labor Statistics indicates significant changes in the unemployment rate during the evaluation period. As illustrated in the following table, the unemployment rate in the U.S., State of Georgia, Baldwin County, and Putman County decreased from 2018 to 2019, but increased significantly in 2020 due to the COVID-19 pandemic. The assessment area's unemployment rate was in line with the state's rate in 2018, 2019, and 2020, but below the national rate in 2020.

Area	2018	2019	2020
	%	%	%
Baldwin County	5.0	4.3	6.9
Putman County	5.1	4.4	6.6
State of Georgia	4.0	3.5	6.6
National Average	3.9	3.7	8.1
Source: U.S. Department of Labor Statistics			

Competition

The market is competitive for financial services. According to FDIC Deposit Market Share data as of June 30, 2020, seven financial institutions operated 16 branches within the assessment area. Of these institutions, CB&T ranked first with a deposit market share of 24.6 percent. The two remaining leading financial institutions were Truist Bank and Exchange Bank. These three area leaders accounted for 64.2 percent of the total deposit market share.

Significant competition exists in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to 2020 Peer Mortgage Data, 293 lenders reported 3,839 originated or purchased home mortgage loans. The top five home mortgage originators (by number of loans) were Exchange Bank; Quicken Loans, LLC; Fairway Independent Mortgage Company; Truist Bank; and Wells Fargo Bank, National Association. Collectively, these lending institutions accounted for 27.9 percent of the total market share. Although CB&T does not report home mortgage loans, the data demonstrates the competitive market for home mortgage lending. In addition, in 2019, 55 CRA-reportable lenders originated 899 small business loans in the assessment area. This further magnifies the competitive lending market in the assessment area.

Community Contact(s)

Contacts with community organizations are used during CRA evaluations to gain insight regarding the credit needs and economic conditions of the bank's assessment area. The examiners contacted a representative from a local organization in Baldwin County, Georgia. The organization serves the greater area of central Georgia.

The contact indicated many points of employment are local; however, commutes exist within the region primarily to the Macon Bibb County area. The contact also indicated prospects for the local economy are favorable, with anticipated new jobs and hourly pay in the Macon, Georgia, area growing at twice the national rate. To that end, the contact indicated that workforce programs are needed to help businesses attract highly skilled individuals. The contact further indicated that more outreach programs to teach and educate underprivileged individuals about the importance of financial institutions and establishing a healthy credit history are needed. The contact believes individuals and the community would benefit from both the workforce development and financial literacy programs. The training would provide individuals the opportunity to become home and business owners.

Credit Needs

Based on demographic information and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. First, the relatively high number of low- and moderate-income families, at 21.1 percent and 16.9 percent, respectively, indicates a strong need for quality affordable housing. This is further magnified given 15.7 percent of families have incomes below the poverty level, and the median housing value at \$146,021. Thus, government-guaranteed home loan programs with more flexible underwriting criteria may be needed. Second, small business loans may be needed, as there are a significant percentage of businesses with gross annual revenues of \$1.0 million or less (87.0 percent) and a large number of businesses with 9 or fewer employees at 91.0 percent.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from February 8, 2016, to the current evaluation dated November 1, 2021. Examiners used the Small Bank CRA Examination Procedures to evaluate CB&T'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

The CRA regulation requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. CB&T's major product line are business and one-to-four family home mortgage loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated or purchased during the evaluation period. As a result, small business and home mortgage were reviewed.

For this evaluation, loan distribution analyses were conducted on the bank's 2020 small business and home mortgage loans, which is representative of the bank's activity and focus since the previous evaluation. More weight was given to business loans in the overall Lending Test conclusion, as they constituted a majority of loans originations during the evaluation period.

Examiners reviewed all small business loans originated in 2020 to draw conclusions about the bank's small business lending performance throughout the evaluation period. During the evaluation period, the bank originated 112 small business loans totaling \$13.1 million. The entire universe was used to evaluate the bank's performance. As a non-reporter, aggregate small business lending data does serve as an appropriate comparison; therefore, examiners compared the bank's small business lending performance to 2020 D&B business demographic data.

Examiners reviewed all home mortgage homes originated in 2020 to draw conclusions about the bank's home mortgage lending performance throughout the evaluation period. During the evaluation period, the bank originated 91 home mortgage loans totaling \$11.4 million. The entire universe was used to evaluate the bank's performance. The bank is not subject to the Home Mortgage Disclosure Act. Therefore, the bank is not required to collect and report certain data concerning applications for home mortgage loans. For this reason, examiners compared the bank's home mortgage lending performance to applicable 2015 ACS data.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, CB&T demonstrated satisfactory performance under the Lending Test. The bank's performance in its assessment area, relative to the LTD ratio, assessment area concentration, geographic distribution, and borrower profile, support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the bank's size, financial condition, and assessment area's credit needs. CB&T's LTD ratio, calculated from its Call Report, averaged 66.3 percent over the previous 23 quarters. The ratio has fluctuated quarter-to-quarter, with no trend noted. Since the previous evaluation, the LTD ratio has ranged from a low of 51.1 percent on March 31, 2021, to a high of 75.8 percent on September 30, 2019. As of June 30, 2021, the LTD ratio was 53.8 percent.

Examiners use similarly situated institutions (SSI) for comparison. An SSI will generally share similar attributes such as size, branch network, product lines, and assessment area(s). Examiners identified three SSIs. The average net LTD ratios for those SSIs over the same 23 quarters are shown in the following table. As shown, the bank's LTD ratio is in line with the SSIs. Refer to the table below for additional details.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2021 (\$000s)	Average Net LTD Ratio (%)
CB&T Bank	338.4	66.3
Exchange Bank Company	332.4	66.0
Farmers & Merchants Bank	228.0	52.1
The Peoples Bank	191.2	66.4
Source: Call Report 3/31/2016 through 6/30/2021		

Assessment Area Concentration

A majority of the loans reviewed were originated inside CB&T's assessment area. The following table reveals a majority of small business and home mortgage loans, by number, originated inside the assessment area. The bank's performance indicate its willingness to serve the credit needs of the 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		
	#	%	#	%		\$	%	\$	%	
Small Business	81	72.3	31	27.7	112	7,333	55.8	5,805	44.2	13,138
Home Mortgage	63	69.2	28	30.8	91	5,308	46.2	6,184	53.8	11,492
Source: 2020 Bank Records.										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. This conclusion is based on reasonable dispersion of small business and home mortgage loans. There are no low-income census tracts in the bank's assessment area.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The percentage of loans in moderate-income census tracts was consistent with the

percentage of businesses in the assessment area. The following table illustrates the dispersion of small business loans by tract income level.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate					
2020	7.0	6	7.4	337	4.6
Middle					
2020	44.9	40	49.4	3,472	47.3
Upper					
2020	48.0	35	43.2	3,524	48.1
Not Available					
2020	0.0	0	0.0	0	0.0
Totals					
2020	100.0	81	100.0	7,333	100.0
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank's percentage of loans in moderate-income census tracts exceeded the percentage of owner occupied housing units in the assessment area. The following table illustrates the dispersion of home mortgage loans by tract income level.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate					
2020	6.0	6	9.5	209	4.0
Middle					
2020	43.4	22	34.9	1,541	29.0
Upper					
2020	50.6	35	55.6	3,558	67.0
Not Available					
2020	0.0	0	0.0	0	0.0
Totals					
2020	100.0	63	100.0	5,308	100.0
Source: 2015 ACS; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels. This conclusion is based on reasonable penetration of small business and poor penetration of home mortgage loans.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. Lending to businesses with gross annual revenues of \$1 million or less was comparably below the percentage of those businesses in the assessment area. The following table illustrates the distribution of loans by gross revenue level of businesses.

Borrower Profile Distribution of Small Business Loans					
GAR Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	87.0	67	82.7	4,697	64.1
>1,000,000	3.1	12	14.8	2,592	35.3
Revenue Not Available	9.9	2	2.5	44	0.6
Totals	100.0	81	100.0	7,333	100.0
<i>Source: 2020 D&B Data; Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>					

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among individuals of different income levels. The bank's lending percentage to low- and moderate-income borrowers was well below the percentage of families in the assessment area. Several factors may have contributed to the low percentage of lending to those individuals. For example, families living below the poverty level in the assessment area total 15.7 percent. In addition, given the low percentage of owner occupied housing units (6.0 percent) in the moderate census tracts, coupled with the median housing value (\$146,021), present a challenge for the bank to extend lending to low- and moderate-income borrowers. Additionally, the bank's performance is further mitigated, as the bank does not originate long-term, fixed-rate home mortgage loans. This loan type is typically more suitable for certain borrowers, particularly low- and moderate-income borrowers. The bank has a referral program with lenders in the secondary market that provides longer-term, fixed-rate financing to borrowers. The following table illustrates the dispersion of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	21.1	2	3.2	55	1.0
Moderate	16.9	1	1.6	71	1.3
Middle	14.6	8	12.7	380	7.2
Upper	47.4	50	79.3	4,690	88.4
Not Available	0.0	2	3.2	112	2.1
Total	100.0	63	100.0	5,308	100.0
<i>Source: 2015 ACS Data; and 2020 Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>					

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping meet the community credit needs; therefore, this consideration did not affect the 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 geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

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.

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.

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.