# 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/Branches Opened or Closed the last two years, if applicable
- Assessment Areas including census tracts
- · Products and Services
- Loan to Deposit Ratios
- CRA Performance Evaluation
- Public Comments, 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

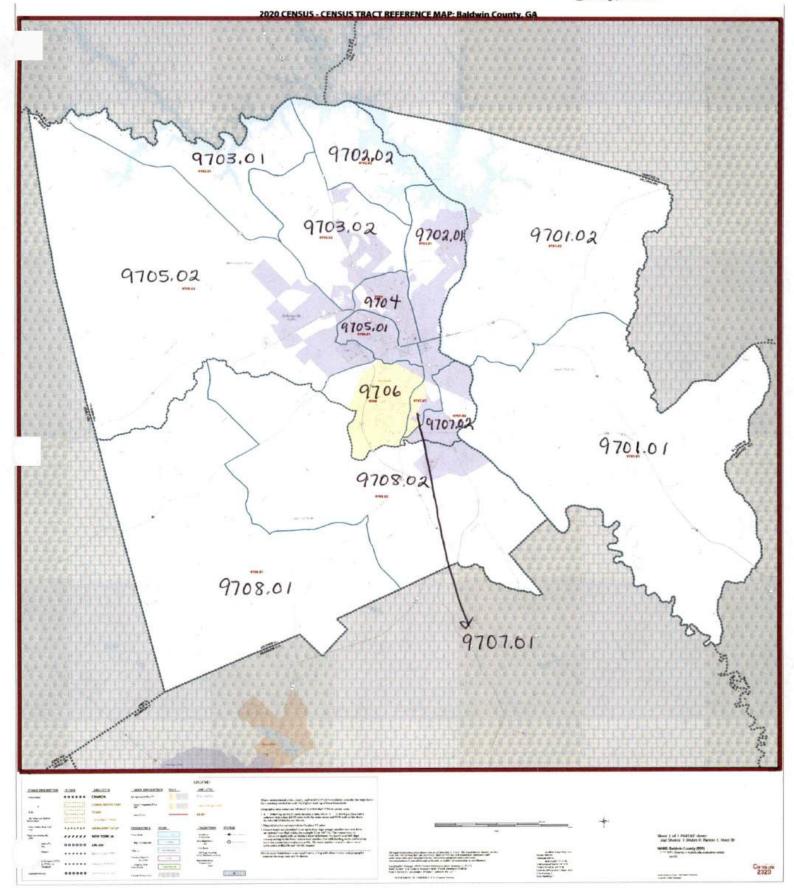
Northside Office 1800 North Columbia Street Milledgeville, Georgia 31061

<u>Lobby Hours</u> 9:00 A.M. to 5:00 P.M. Monday through Friday

<u>Drive In Hours</u> 8:30 A.M. to 5:00 P.M. Monday through Friday

# BRANCHES OPEN AND CLOSED

As of March 31, 2025, we have not opened or closed any branches within the last two years.



Putnam 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Putnam Count 9602.01 9601.03 9601.04 9602.03 9602.04 9601.01 9603.01 9603,02 House, the control of Carriero ZUZU \*\*\*\*\* MPMAS ---

State: 13 - GEORGIA (GA)

County: 009 - BALDWIN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est,MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
13	009	9701.01	Upper	No	158.59	\$69,300	\$109,903	\$88,782	2386	51.76	1235	640	797
13	009	9701.02	Middle	Yes*	95.86	\$69,300	\$66,431	\$53,664	2773	33.79	937	1212	1782
13	009	9702.01	Moderate	No	52.33	\$69,300	\$36,265	\$29,297	3744	61.70	2310	480	1562
13	009	9702,02	Upper	No	125.04	\$69,300	\$86,653	\$70,000	3161	23.73	750	876	1458
13	009	9703.01	Upper	No	167,29	\$69,300	\$115,932	\$93,654	2659	31.97	850	815	1524
13	009	9703.02	Upper	No	152.39	\$69,300	\$105,606	\$85,313	3685	51.29	1890	779	1343
13	009	9704.00	Upper	No	132,92	\$69,300	\$92,114	\$74,415	4120	53.28	2195	975	1927
13	009	9705.01	Unknown	No	0.00	\$69,300	\$0	\$0	3384	37.41	1266	165	955
13	009	9705.02	Upper	No	135.32	\$69,300	\$93,777	\$75,755	2650	32.83	870	714	856
13	009	9706.00	Moderate	No	62.08	\$69,300	\$43,021	\$34,754	3586	73.26	2627	950	2049
13	009	9707.01	Moderate	No	71.00	\$69,300	\$49,203	\$39,750	1889	78.88	1490	142	784
13	009	9707.02	Unknown	No	0.00	\$69,300	\$0	\$0	1830	66.28	1213	260	800
13	009	9708.01	Upper	No	135,66	\$69,300	\$94,012	\$75,948	2748	35,23	968	1069	1434
13	009	9708.02	Low	No	47.12	\$69,300	\$32,654	\$26,382	5184	53,36	2766	843	1332

<sup>\*</sup> Will automatically be included in the 2025 Distressed or Underserved Tract List

#### 2024 FFIEC Census Report - Summary Census Demographic Information

State: 13 - GEORGIA (GA)

County: 237 - PUTNAM COUNTY



State Code	County	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non- MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
13	237	9601.01	Middle	No	91.78	\$69,300	\$63,604	\$51,380	3377	13.74	464	1242	2438
13	237	9601.03	Upper	No	122.33	\$69,300	\$84,775	\$68,487	2718	21.01	571	731	1202
13	237	9601.04	Upper	No	215.51	\$69,300	\$149,348	\$120,647	2935	13.36	392	899	1982
13	237	9602.01	Middle	No	97.26	\$69,300	\$67,401	\$54,450	1347	47.66	642	243	498
13	237	9602.03	Moderate	No	62.38	\$69,300	\$43,229	\$34,921	3568	56.59	2019	1351	1880
13	237	9602.04	Moderate	No	68.35	\$69,300	\$47,367	\$38,266	3214	80.43	2585	835	1282
13	237	9603.01	Middle	No	114.59	\$69,300	\$79,411	\$64,151	2805	25.31	710	1021	1710
13	237	9603.02	Upper	No	193.32	\$69,300	\$133,971	\$108,224	2083	16.71	348	762	1341
13	237	9999.99	Middle	No	112.63	\$69,300	\$78,053	\$63,054	22047	35.07	7731	7084	12333

<sup>\*</sup> Will automatically be included in the 2025 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 0.249% 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

That'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 0.249% 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 an non-compounding APY\* of 3.50%; (2) daily balances over \$24,999.99 earn 0.249% 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.

\*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.

#### 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  Imposed on NSF paid items created by checks, in-person withdrawals, ATM withdrawals or other electronic means.	\$32 per item
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 Imposed when checks and items presented by electronic means are returned unpaid.	\$32 per item
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)  Imposed on transfers to cover overdrafts created by checks, ACHs, or other electronic means. Transfers do not occur to pre-authorized debit card transactions.	\$7.50 per day
ODP Advance Fee (ODP LOC)  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.	\$9.95 per day
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

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Limits and Fees Disclosure
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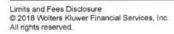
Cashier's Check

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\$7 Each



Counter Items  Items print 4 to a page. Available for checks and deposit slips.	\$1 per page
Deposited Canadian Item	\$50 per Item
Collection Item Fee - Incoming	\$10 per Item
Collection Item Fee - Outgoing	\$20 per Item
IRA Withdrawal Fee This fee is charged when transferring an IRA to another institution.	\$25
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
	15 X 44 - \$480
Safe Deposit Box Replacement Key	\$40 per Key



Safe Deposit Box Drilling



\$275 per Box



# **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 (1hour minimum)

Garnishment \$75 per Request

Limits and Fees Disclosure

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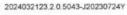
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Levy/Other Legal Proceeding	\$75 per Request
Safe Deposit Box Annual Rates	2 X 5 - \$15
	3 X 5 - \$21
	3 X 10 - \$42
	5 X 10 - \$65
	10 X 10 - \$105
	11 X 12 - \$120
	15 X 22 - \$240
	15 X 44 - \$480
Safe Deposit Box Replacement Key	\$40 per Key
Safe 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****  ***NSF Fees (Paid or Returned) will be directly charged to your account if not included in Analysis Fees.	\$32.00 per item
Coin and Currency Orders	
Wrapped Coins	\$ 1 per \$1,000
Strapped Currency	\$ 1 per \$1,000

Limits and Fees Disclosure
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# 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

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## 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:

• .5% origination fee and \$500 underwriting

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	LOA	INS	DEP	OSITS	Loan To Deposit Ratio
3/31/2024	\$	176,812,000	\$	323,272,000	54.69%
6/30/2024	\$	186,042,000	\$	311,760,000	59.67%
9/30/2024	\$	190,514,000	\$	313,569,000	60.76%
12/31/2024	\$	188,632,000	\$	313,001,000	60.27%

### PUBLIC DISCLOSURE

October 15, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Century Bank & Trust Certificate Number: 147

141 S. Wayne Street Milledgeville, Georgia 31061

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

> 10 10<sup>th</sup> Street NE, Suite 900 Atlanta, Georgia 30309-3849

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

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#### INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment 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 ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment area.
- The institution originated a majority of its small business and home mortgage loans in its assessment area.
- The geographic distribution of small business and home mortgage 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 (including low- and moderate-income).
- The institution did not receive any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

#### **DESCRIPTION OF INSTITUTION**

#### Background

Century Bank & Trust (CB&T) is a state-chartered, community bank headquartered in Milledgeville, Baldwin County, Georgia. The bank is a wholly owned by Century Bancorp, Inc., a one-bank holding company also located in Milledgeville, Georgia. CB&T received a Satisfactory rating at its previous CRA Performance Evaluation, dated November 1, 2021, based on Interagency Small Institution Examination Procedures.

#### **Operations**

CB&T operates two full-service offices in Milledgeville, Georgia, and one loan production office in Greensboro, Greene County, Georgia. The three offices are located in the Non-metropolitan Statistical Area (Non-MSA) of Georgia. The bank has not opened or closed any branches or participated in any merger or acquisition activities since the previous evaluation.

CB&T is primarily a commercial lender, which remains unchanged since the previous evaluation. The bank offers a variety of commercial, home mortgage, and consumer loan products and services to meet the needs of its community. In addition, the bank maintains investor relationships and originates long-term residential mortgage loans that are subsequently sold on the secondary market. CB&T also offers and originates Small Business Administration guaranteed loan products. The bank provides a variety of deposit products, including checking, savings, money market, certificates of deposits, and individual retirement accounts. Further, the bank offers alternative systems for delivering retail service including internet banking, mobile banking, and automated teller machines.

#### **Ability and Capacity**

As of the June 30, 2024, Consolidated Reports of Condition and Income (Call Report), CB&T had total assets of \$348.8 million, total loans of \$186.0 million, total deposits of \$311.8 million, and total securities of \$135.8 million. As shown in the following table, commercial loans (loans secured by nonfarm nonresidential properties and commercial and industrial loans) represent the largest portion of the loan portfolio, at 49.9 percent, followed by residential loans at 27.1 percent, and construction and land development at 15.6 percent. Consumer and farm loans (loans secured by farmland and agricultural loans) represented a nominal percent of the loan portfolio at 1.1 and 0.8 percent, respectively.

Loan Portfolio Distrib	oution as of 6/30/2024	
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	28,960	15.6
Secured by Farmland	1,491	0.8
Secured by 1-4 Family Residential Properties	50,363	27.1
Secured by Multifamily (5 or more) Residential Properties	6,930	3.7
Secured by Nonfarm Nonresidential Properties	87,747	47.2
Total Real Estate Loans	175,491	94.4
Commercial and Industrial Loans	\$4,983	2.7
Agricultural Production and Other Loans to Farmers	31	ä
Consumer Loans	2,120	1.1
Loans to non-depository financial institutions	32	-
Other Loans	4,000	2.2
Less: Any unearned income on loans	(615)	(0.3)
Total Loans	186,042	100.0

Examiners did not identify any financial or legal impediments, other than legal lending limits, that would affect the bank's ability to meet the credit needs of its assessment area.

#### 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's assessment area has not changed since the previous evaluation. The bank continues to have one delineated assessment area, located in central Georgia, and consists of Baldwin and Putnam counties in their entirety. These adjacent counties are located within the Non-MSA of Georgia. Bank management delineated the assessment area based on the location of the bank's offices and the expectation of attracting and retaining a customer base within the areas surrounding the bank's offices.

Assessment area delineations are based on available census data. Specifically, the 2015 American Community Survey (ACS) Census data was used at the previous evaluation to delineate the assessment area. In 2022, the Federal Financial Institutions Examination Council (FFIEC) released updates to the MSA and Metropolitan Divisions, states, counties, census tracts, and income-level indicators based on information collected during the 2020 United States (U.S.) Census. As a result, the number of census tracts increased and some income classifications changed, which impacted the bank's assessment area geographies. The following table details the changes to the assessment area for the previous and current evaluations.

Tract Income Level	Assessment Area 2015 Geographies	Assessment Area 2020 Geographies
Low	) = .	1
Moderate	2	5
Middle	7	4
Upper	5	10
Income Level Not Assigned		2
Total	14	22
Source: Bank Data, 2015 ACS Data, and 2020 U.S. Cei	nsus Data	

The FFIEC has designated certain Non-MSA middle-income census tracts as distressed and/or underserved. The distressed designation is based on high unemployment rates, poverty rates, and/or population loss. The underserved designation is based on areas being rural and remote. One middle-income census tract in Baldwin County is designated as distressed due to high poverty rates.

### **Economic and Demographic Data**

The following table presents select demographic information from the 2020 U.S. Census and Dun & 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)	22	4.5	22.7	18.2	45.5	9.1		
Population by Geography	65,846	7.9	24.3	15.6	44.3	7.9		
Housing Units by Geography	33,908	3.9	24.1	19.2	45.4	7.5		
Owner-Occupied Units by Geography	17,004	5.0	22.1	21.9	48.6	2.5		
Occupied Rental Units by Geography	9,151	4.4	29.9	9.9	39.0	16.8		
Vacant Units by Geography	7,753	1.1	21.4	24.2	45.9	7.5		
Businesses by Geography	8,632	3.3	24.0	11.4	55.6	5.7		
Farms by Geography	319	4.7	16.6	15.4	60.5	2.8		
Family Distribution by Income Level	16,480	22.1	14.9	16.2	46.8	0.0		
Household Distribution by Income Level	26,155	23.7	14.9	14.8	46.5	0.0		
Median Family Income Non-MSAs - GA		\$55,969	Median Housi	ng Value		\$155,176		
			Median Gross	Rent		\$754		
			Families Belov	w Poverty Le	vel	15.2%		

Source: 2020 U.S. Census and 2023 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.

According to 2023 D&B data, there are 8,632 total non-farm businesses operating in the assessment area. Of these total businesses, 96.2 percent reported operating with gross annual revenues of \$1

million or less. Further, 63.3 percent of these total businesses reported having four or fewer employees and 93.6 percent reported operating from a single location.

According to 2023 D&B data, the top industries in Baldwin County were retail trade followed by health care and social assistance, construction, accommodation and food services, and other services. The top employers throughout Baldwin County included AW Holdings, LLC; Barbarakares, Fouts Bros, Inc.; Georgia Corrections & Detention, Inc.; and Georgia College & State University. The top industries in Putnam County were retail trade followed by construction, health care and social assistance, accommodation and food services, and professional, scientific, and technical services. The top employers throughout Putnam County included Aalto Scientific, Ltd.; BLST Operating Company, LLC; Cuscowilla Management & Administrative Services, LLC; and Gro Tec, Inc.

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, only 3.3 percent of businesses and 5.0 percent of the owner-occupied housing units are in low-income census tracts. This data indicates limited lending opportunities in low-income census tracts. Further, 15.2 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.

	Medi	an Family Income Range	s	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
	GA Non-	-MSA Median Family Inc	ome	
2023 (\$69,100)	<\$34,550	\$34,550 to <\$55,280	\$55,280 to <\$82,920	≥\$82,920
Source: FFIEC	-			

According to the Bureau of Labor Statistics, the annual unemployment rates fluctuated from 2021 to 2023. In 2021, the unemployment rates for both Baldwin and Putnam Counties were above the state but below the nation. In 2022, the unemployment rate for Baldwin County was above the state and nation while the unemployment rate for Putnam County was in line with the nation and above the state average. In 2023, Baldwin and Putnam counties' unemployment rates were above both the state and national average. The following table reflects the average annual unemployment rates and trends for the assessment area, state, and nation.

	Unemployment	Rates		
Area	2021	2022	2023	
Area	%	%	%	
Baldwin County	4.9	4.1	4.2	
Putnam County	4.0	3.6	3.8	
State of Georgia	3.9	3.1	3.2	
National Average	5.3	3.6	3.6	

#### Competition

According to the June 30, 2024, Summary of Deposits report, there are seven institutions operating 12 offices in this assessment area. The top five financial institutions accounted for 94.2 percent of the total deposit market share. Of these institutions, CB&T ranked 1<sup>st</sup> and held a deposit market share of 24.6 percent.

There is a high level of competition for small business loans within the assessment area. For small business loans, 2022 aggregate data reflects 58 lenders reported the origination of 1,188 small business loans totaling approximately \$26.4 million. The top five lenders (by number of small business loans) were American Express National Bank, Synchrony Bank, Capital One, N.A., JPMorgan Chase Bank, NA, and Truist Bank. Collectively, these lenders accounted for 44.1 percent of the total market share. Although CB&T does not report small business loans, the data demonstrates the competitive market for small business lending.

There is a high level of competition for home mortgage loans among several national banks, credit unions, and non-depository mortgage lenders in the assessment area. According to 2023 Peer Mortgage Data, 207 lenders reported the origination or purchase of 1,286 home mortgage loans totaling approximately \$1 billion. The top five lenders (by number of loans) were Fairway Independent Mortgage Corp., Rocket Mortgage, Exchange Bank, Robins Financial Credit Union, and Pennymac Loan Services, LLC. Collectively, these lending institutions accounted for 24.7 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.

CB&T is not required to collect or report its small business loan data under the CRA or home mortgage data under the Home Mortgage Disclosure Act and has elected not to do so. Therefore, the small business and home mortgage analyses under the Lending Test does not include comparisons to aggregate or peer mortgage data. However, aggregate and peer mortgage data reflects the level of demand for small business and home mortgage loans and is therefore, included for context. Aggregate data for small business loans is not available for calendar year 2023. Therefore, 2022 aggregate data was used.

#### **Community Contact**

As part of the evaluation, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps examiners determine

whether local financial institutions are responsive to those needs and to identify the credit opportunities that are available.

Examiners conducted one community contact with an organization in Baldwin County, Georgia. The organization provides services to stimulate economic development, business development, and quality job growth in the assessment area. The contact indicated that the assessment area's economy is rebuilding from the withdrawal of Federal and State funding due to the closure of several of the area's mental health institutions and prisons. Therefore, there is a need for new businesses in the area to stimulate the economy. In addition, the contact stated that there is a need for affordable housing. The contact also indicated a need for workforce development training programs. The contact stated that many residents travel outside of the assessment area for employment opportunities because they lack the skills needed to qualify for jobs within the assessment area. Lastly, the contact indicated that local financial institutions have generally been responsive to the needs of the community and stated that there are opportunities for partnerships with local organizations to help meet the credit and general community needs.

#### **Credit Needs**

Considering demographic and economic data, examiners determined that small business loans are a primary credit need and opportunity within the assessment area. The significant percentage of businesses operating with gross annual revenues of \$1 million or less (96.2 percent) and the percentage of businesses operating with four or fewer employees (63.3 percent) supports this conclusion. In addition, the relatively high percentage of low- and moderate-income families, at 22.1 percent and 14.9 percent, respectively, indicates a need for quality affordable housing. This is further magnified given 15.2 percent of families have incomes below the poverty level, with the median housing value at \$155,176. Thus, government-guaranteed home loan programs with more flexible underwriting criteria are a need.

#### SCOPE OF EVALUATION

#### **General Information**

The evaluation covers the period from the previous evaluation, dated November 1, 2021, to the current evaluation dated October 15, 2024. Examiners used the Small Bank CRA Examination Procedures to evaluate the 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 areas with respect to home mortgage, small business, and small farm loans, if significant. CB&T's major product lines are commercial and 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 loans were reviewed.

For this evaluation, loan distribution analyses were conducted on the bank's 2023 small business and home mortgage loans, which is representative of the bank's activity and focus since the previous evaluation. Examiners reviewed the number and dollar volume of small business and home mortgage loans. While the number and dollar volume of loans are presented, examiners emphasized performance by the number of loans since it is a better indicator of the number of businesses and individuals served. Considering lending volume, equal weight was given to small business and home mortgage loans in determining overall Lending Test conclusions. In addition, for all loan products reviewed, the *Geographic Distribution* and *Borrower Profile* criteria only include loans originated inside the assessment area.

Examiners reviewed all small business loans originated in 2023 to draw conclusions about the bank's small business lending performance throughout the evaluation period. During the evaluation period, the bank originated 97 small business loans totaling \$9.6 million. The entire universe was used to evaluate the bank's performance. As a non-reporter, examiners compared the bank's small business lending performance to 2023 D&B business demographic data.

Examiners reviewed all home mortgage homes originated in 2023 to draw conclusions about the bank's home mortgage lending performance throughout the evaluation period. During the evaluation period, the bank originated 102 home mortgage loans totaling \$17.3 million. The entire universe was used to evaluate the bank's performance. The bank is not required to collect and report certain data concerning applications for home mortgage loans. Therefore, examiners compared the bank's home mortgage lending performance to applicable 2020 U.S. Census data.

#### CONCLUSIONS ON PERFORMANCE CRITERIA

#### LENDING TEST

Overall, CB&T demonstrated satisfactory performance under the Lending Test. The bank's reasonable loan-to-deposit ratio, geographic distribution, and borrower profile performances support this conclusion.

#### Loan-to-Deposit (LTD) Ratio

The net LTD ratio is reasonable given the bank's size, financial condition, and assessment area's credit needs. CB&T's net LTD ratio, calculated from its Call Report, averaged 53.0 percent over the previous 11 quarters. The ratio has fluctuated quarter-to-quarter, with no trend noted. Since the previous evaluation, the net LTD ratio has ranged from a low of 46.6 percent on March 31, 2022, to a high of 59.6 percent on September 30, 2023. As of June 30, 2024, the net LTD ratio was 58.9 percent.

Examiners use similarly situated institutions for comparison. A similarly situated institution will generally share comparable attributes such as size, branch network, product lines, and assessment area.

Examiners identified three similarly situated institutions. The average net LTD ratios for those similarly situated institutions over the same 11 quarters are shown in the following table.

Bank	Total Assets as of 6/30/2024 (\$000s)	Average Net LTD Ratio (%)	
CB&T Bank, Milledgeville, Georgia	349.0	53.0	
Exchange Bank Company, Milledgeville, Georgia	385.0	59.9	
Farmers & Merchants Bank, Eatonton, Georgia	271.4	42.9	
The Peoples Bank, Eatonton, Georgia	243.0	70.8	
Source: Call Reports 12/31/2021 through 6/30/2024			

#### **Assessment Area Concentration**

CB&T originated a majority of its home mortgage and small business loans by number and dollar volume within the assessment area. The following table details lending inside and outside of the assessment area.

Number of Loans		s		Dollar Amount of Loans						
Loan Category	Inside Outsi		side	le Total	Inside		Outside		Total	
	#	%	#	%	#	\$	%	\$	%	\$
Small Business							-0/			
2023	70	72.2	27	27.8	97	4,856	50.7	4,720	49.3	9,577
Home Mortgage										
2023	72	70.6	30	29.4	102	12,150	70.2	5,169	29.8	17,319
Total	142	71.4	57	28.6	199	17,006	63.2	9,889	36.8	26,896

#### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. This conclusion is based on a reasonable dispersion of small business and home mortgage loans.

#### Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area's low- and moderate-income census tracts.

CB&T's small business lending in low-income geographies is comparable to demographics reflecting reasonable performance. The bank's lending in moderate-income geographies trails the demographics but is considered reasonable. Although the bank's performance is below demographic data in the

moderate-income geographies, it is considered reasonable due to the high level of competition for small business lending 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)	%	
Low	3.3	3	4.3	88	1.8	
Moderate	24.0	12	17.1	832	17.1	
Middle	11.4	1	1.4	60	1.2	
Upper	55.6	50	71.4	3,524	72.6	
Not Available	5.7	4	5.7	352	7.2	
Totals	100.0	70	100.0	4,856	100.0	

#### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area's low- and moderate-income census tracts.

CB&T's home mortgage lending in low-income geographies is comparable to demographics and reflects reasonable performance. The bank's lending in moderate-income geographies significantly trails demographics. However, considering the lack of available housing stock coupled with the significant competition from local, regional, and national institutions, this performance is deemed reasonable. The following table illustrates the dispersion of home mortgage loans by tract income level.

Tract Income Level	% of Owner- Occupied Housing Units	#	%	\$(000s)	%
Low	5.0	5	6.9	493	4.1
Moderate	22.1	7	9.7	820	6.7
Middle	21.9	8	11.1	1,035	8.5
Upper	48.6	48	66.7	9,327	76.8
Not Available	2.5	4	5.6	475	3.9
Total	100.0	72	100.0	12,150	100.0

#### **Borrower Profile**

The distribution of small business and home mortgage loans reflects reasonable penetration among businesses of different sizes and borrowers of different income levels.

#### Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. While the bank's performance slightly trails demographic data, the bank originated 55.7 percent, the majority, of its small business loans to businesses with gross annual revenues less than \$250,000, which reflects a willingness to support smaller businesses. Additionally, many of the smaller businesses seek alternative sources of financing, impacting the demand for small business loans. The following table illustrates the dispersion of small business loans by gross annual revenue.

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000		26	37.1	898	18.5
\$100,000 - \$249,999		13	18.6	260	5.4
\$250,000 - \$499,999		7	10.0	1,192	24.5
\$500,000 - \$1,000,000		13	18.6	1,473	30.3
Subtotal <=\$1,000,000	91.7	59	84.3	3,823	78.7
>\$1,000,000	1.7	8	11.4	1,006	20.7
Revenue Not Available	6.6	3	4.3	27	0.6
Totals	100.0	70	100.0	4,856	100.0

#### Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable dispersion among low- and moderate-income borrowers. Lending performance to low-income borrowers was significantly below demographics. A factor that impacts the bank's lending is the poverty rate. According to 2020 U.S. Census data, 15.2 percent of families in the assessment area live below the poverty level. These individuals have limited financial resources and typically do not qualify for traditional financing, which limits the opportunity to lend to individuals in this category. The high poverty rate coupled with information from the community contact indicating a lack of affordable housing further mitigates this performance. Lending performance to moderate-income borrowers was comparable to demographics. The following table illustrates the dispersion of home mortgage loans by income level.

Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	22.1	2	2.8	69	0.6
Moderate	14.9	9	12.5	596	4.9
Middle	16.2	11	15.3	1,071,	8.8
Upper	46.8	50	69.4	10,414	85.7
Not Available	0.0	0	0.0	0	0.0
Total	100.0	72	100.0	12,150	100.0

#### 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:

- 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.