



PUBLIC DISCLOSURE

October 3, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Coffee County
#22327

420 S Madison Ave
Douglas, GA 31533

Office of the Comptroller of the Currency

Tampa Office
4042 Park Oaks Blvd, Suite 240
Tampa, FL 33610

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding

The lending test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on Outstanding performance in the state of Florida and Satisfactory performance in the state of Georgia. The bank's level of lending to small businesses in both states greatly exceeded the aggregate performance measure.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The majority of the bank's loans were made in the bank's assessment areas (AA).
- The bank participated heavily in the Small Business Administration (SBA) Paycheck Protection Program (PPP) providing 655 loans totaling \$39.1 million

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable.

The bank's quarterly average net LTD ratio during the evaluation period was 63.35 percent, ranging from a high 80.06 percent in the third quarter of 2019 to a low of 47.83 percent in the fourth quarter of 2021. FNBCC's quarterly average LTD ratio is below the 85.01 percent quarterly average LTD ratio of five similarly situated banks operating within three counties that border the bank's assessment area. The quarterly average high net LTD ratio for these five banks was 98.44 percent and the low was 75.61 percent. The community banks selected had less than \$480 million in total assets and offer similar lending and deposit products. A majority of comparable institutions experienced a decline to the LTD ratio quarter-over-quarter. The bank's LTD was lower than similarly situated banks, but still reasonable as the bank made significant PPP loans over the course of 2020 and 2021 totaling \$39 million, which have since been forgiven, and contributed to the declining LTD.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area(s) (AAs).

The bank originated and purchased 78 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This level of lending in the AA allowed us to reliably estimate the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	27	71	11	29	38	2,296	70	983	30	3,279
Small Business	46	75	15	25	61	8,848	56	6,991	44	15,839
Consumer	51	84	10	16	61	476	80	121	20	597
Total	124	78	36	22	160	11,620	59	8,095	41	19,715

Description of Institution

As of December 31, 2021, the First National Bank of Coffee County (FNBCC) was a \$402 million retail banking institution that is wholly owned by FNC Bancorp, Inc., a single bank holding company. FNBCC's main office is located at 420 Madison Ave S, Douglas, GA. The bank also operates several branches serving the credit and deposit needs of its customers located in Boca Raton, FL, Fort Lauderdale, FL, Palm Beach Gardens, FL, and Wellington FL, the latter two branches were opened during the evaluation period. There are two ATMs located in Coffee County, three located in Palm Beach County, and one in Broward County. In Coffee County, one ATM is located on the premises of the bank and a second machine is located in the Coffee Regional Medical Center located at 1101 Ocilla Highway, Douglas, GA. The ATM on the bank premises accepts deposits and the ATM located at Coffee Regional Medical Center does not accept deposits. There is an ATM located on the premises of each branch in the South Florida market. The ATMs in Boca Raton and Palm Beach Gardens do not accept deposits. The ATMs in Fort Lauderdale and Wellington do accept deposits.

FNBCC offers full service banking, including online services and drive-thru operations. The bank's products includes a selection of fixed and adjustable rate loans that include commercial and commercial real estate loans, residential real estate, agriculture, and other consumer loans. The bank's products include government assisted lending including United States Department of Agriculture (USDA)/Farm Service Agency (FSA) and SBA loans. Deposit products include personal and business checking accounts, savings accounts, certificates of deposit, and individual retirement accounts.

FNBCC's primary strategy is to meet its local community credit needs. There is, however, a moderate amount of competition in both of their market areas area including other locally-owned national banks, state banks, credit unions, and nationwide institution branches. Lower loan demand and concerns about competition helped influence the bank's decision to branch into another state. There are no financial or legal obstacles affecting FNBCC's ability to meet its community credit needs. FNBCC received an overall rating of "Satisfactory" during its previous CRA evaluation dated May 21, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period will be the years ended December 31, 2019-2021. We used the Small Bank CRA examination procedures, which evaluates the bank's record of meeting the credit needs of its AAs through its lending activities.

The bank's primary products of residential, commercial, and consumer lending were selected for consideration in this evaluation during the period of January 1, 2019 through December 31, 2021.

Our conclusions were based on analysis of a random sample of 20 loans originated for each of the consumer, business, and home mortgage products for each of the years during the evaluation period. In cases where there were not a full 20 loans for each year, we relied on a lower total amount of loans in the sample reflective of all loans made in that time period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank's activities in both states were considered equally, but commercial lending was given more weight as that has been the focus of the bank's expansion into its second assessment area in South Florida. Additionally, the bank made significant loans through the SBA PPP during the evaluation period which have since been forgiven by the SBA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Georgia

CRA rating for the State of Georgia¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank demonstrates reasonable distribution of loans to geographies of different income levels.
- The bank demonstrates excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank made a significant number of SBA PPP loans to help offset the impact of loans to its local community totaling \$19 million across 424 loans.

Description of Institution's Operations in Georgia

FNBCC's headquarters is located in Douglas, GA, and it operates as a full service community bank offering an array of deposit and lending products to meet its community's needs. There is one location in the state of Georgia and two ATMs. Its AA in GA includes all the census tracts (CTs) in Coffee County, GA. FNBCC ranks second in the county for total deposits with \$217 million or 21.45 percent of the market share. FNBCC's competition is high for a rural area with another national institution headquartered nearby in addition to branches of other state, regional, and large national banks, and credit unions.

FNBCC participated in the SBA PPP and lent extensively to its local community to help offset the business disruptions caused by the pandemic providing 136 loans worth \$13.2 million in 2020 and 288 loans worth \$5.8 million in 2021.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Coffee County Assessment Area

The AA does not contain any low income CTs and only one moderate income CT. The majority of the CTs in the AA consist of distressed or underserved middle income CTs. The AA meets the regulatory requirements, does not reflect discrimination, and does not arbitrarily exclude any low- or moderate-income (LMI) geographies. The following table reflects pertinent demographic information about the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Coffee County AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	11.1	77.8	11.1	0.0
Population by Geography	43,003	0.0	14.2	72.6	13.1	0.0
Housing Units by Geography	16,974	0.0	8.5	78.2	13.3	0.0
Owner-Occupied Units by Geography	9,553	0.0	8.6	73.7	17.8	0.0
Occupied Rental Units by Geography	4,768	0.0	5.1	88.9	6.0	0.0
Vacant Units by Geography	2,653	0.0	14.5	75.1	10.4	0.0
Businesses by Geography	3,144	0.0	5.2	83.6	11.2	0.0
Farms by Geography	223	0.0	11.2	65.0	23.8	0.0
Family Distribution by Income Level	9,422	22.1	18.6	21.7	37.6	0.0
Household Distribution by Income Level	14,321	27.2	16.5	18.6	37.7	0.0
Median Family Income Non-MSAs - GA		\$45,886	Median Housing Value			\$85,950
			Median Gross Rent			\$559
			Families Below Poverty Level			17.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Georgia

The Coffee County AA, being the bank's only AA in Georgia, will receive a full scope review. Due to the level of distressed or underserved middle-income geographies and the level of low- and moderate-income (LMI) geographies, middle income geographies will also be considered in our evaluation. The bank is primarily a commercial lender, but provides additional support to its community through residential and consumer lending. In addition, the bank's lending analysis does not include the previously mentioned SBA PPP lending conducted during the evaluation period, which demonstrates a commitment to meeting the communities credit needs.

LENDING TEST

The bank's performance under the Lending Test in Georgia is rated Satisfactory.

Conclusions for Area Receiving a Full Scope Review

Based on a full-scope review, the bank's performance in the Coffee County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table O in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans reflects reasonable distribution of loans in the AA's moderate-income CTs when considering significant market competition and demographic barriers present in the AA. The AA has no low-income CTs. Specifically, for the evaluation period, the bank's level of lending amongst moderate-income geographies is below the aggregate comparators, but within reasonable range when you consider the level of poverty in the AA and the median cost of a home. Additionally, the bank's level of lending to middle-income distressed/underserved geographies exceeded aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's geographic distribution of small loans to businesses of different sizes within the AA is considered excellent. The geographic distribution of small loans to businesses in the AA reflects an excellent distribution of loans amongst the moderate-income CTs. Specifically, the bank's level of AA lending to moderate-income geographies for small loans to businesses exceeds the aggregate lending comparator. The bank's level of lending to middle-income distressed/underserved geographies is near to aggregate lending in the AA.

Consumer Loans

Refer to Table U in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Overall, the geographic distribution of consumer loans reflects adequate distribution of loans in the AA's moderate-income CTs when considering significant market competition and demographic barriers present in the AA. The AA has no low-income CTs. Specifically, for the evaluation period, the bank's level of lending amongst moderate-income geographies is below the aggregate lending comparators, but within reasonable range when you consider the level of poverty in the AA. The bank's level of lending to middle-income distressed/underserved geographies is near to aggregate lending in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During the full evaluation period the bank's borrower distribution of home mortgage loans within the AA is considered reasonable given performance context. The borrower distribution of home mortgage loans reflects a reasonable penetration amongst individuals of different income levels when considering market competition within the AA and inherent demographic factors. The Bank's level of lending during the evaluation period to low-income borrowers exceeds the aggregate lending comparator; however, the level of lending to moderate-income borrowers was below the aggregate lending comparator, resulting in an overall reasonable performance

Small Loans to Businesses

Refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank's borrower distribution of small loans to businesses of different sizes within the AA is considered excellent. Overall the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, as the bank's level of lending to business with revenues less than \$1 million exceeds the aggregate comparator. This analysis does not include loans issued through the SBA PPP.

Consumer Loans

Refer to Table V in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

During the evaluation period, the bank's level of lending to borrowers of different incomes is excellent for consumer loans. The bank's level of lending for both low- and moderate-income borrowers exceeds the percentage of households in the AA.

Responses to Complaints

There were no complaints regarding the bank's CRA performance during the evaluation period.

State Rating

State of Florida

CRA rating for the State of Florida²: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of loans in the State. The bank's level of lending to low- and moderate-income geographies exceeds the percentage of small businesses in both types of geography and the aggregate level.
- The level of lending to small businesses in low-income geographies was three times the aggregate level.
- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- Additionally, the bank made a significant number of SBA PPP loans to help offset the impact of loans to its local community totaling \$20.1 million across 231 loans.

Description of Institution's Operations in Florida

The bank operates four branches in Florida located in Broward and Palm Beach Counties. These branches operate as the First National Bank Coastal Community. The bank's primary focus in Florida is commercial lending, but does offer its full lending services as an accommodation to commercial customers. Each branch location also has an ATM. The ATMs in Boca Raton and Palm Beach Gardens do not accept deposits. The ATMs in Fort Lauderdale and Wellington do accept deposits.

FNBCC ranks fiftieth in the Broward and Palm Beach County AA for total deposits with \$123 million or 0.49 percent of the market share. FNBCC's competition is high with over seventy institutions operating in its AA representing a mix of branches of other state, regional, and large national banks, and credit unions.

FNBCC participated in the SBA PPP and lent extensively to its local community to help offset the business disruptions caused by the COVID-19 pandemic providing 132 loans worth \$10.55 million in 2020 and 99 loans worth \$9.57 million in 2021.

Additionally, we reached out to two community contacts, one with a focus of affordable housing and the other with an emphasis on economic empowerment through business development. Both indicated that affordable housing remains a challenge in the area due to high real estate values pricing out lower

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

earning workers. Neither specifically commented on the bank's activities in the market, but one did have positive commentary on banks engaged in COVID-19 relief through PPP.

Broward and Palm Beach Counties Assessment Area

Broward County is part of the Fort Lauderdale-Pompano Beach-Sunrise, FL Metropolitan Division (MD). Palm Beach County is part of the West Palm Beach-Boca Raton-Boynton Beach, FL MD. Both MDs are part of the Miami-Fort Lauderdale-Pompano Beach, FL MSA. Therefore, for purposes of our evaluation, Broward and Palm Beach Counties will be combined into one AA. The AA meets the regulatory requirements, does not reflect discrimination, and does not arbitrarily exclude any low- or moderate-income (LMI) geographies. The following table reflects pertinent demographic information about the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Broward and Palm Beach Counties AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	700	6.6	28.6	29.9	33.1	1.9
Population by Geography	3,221,958	6.0	28.3	31.9	33.6	0.2
Housing Units by Geography	1,485,771	5.7	28.2	31.9	34.1	0.1
Owner-Occupied Units by Geography	795,212	3.0	24.2	33.4	39.4	0.1
Occupied Rental Units by Geography	409,677	10.5	35.1	31.8	22.4	0.1
Vacant Units by Geography	280,882	6.3	29.5	28.0	36.0	0.2
Businesses by Geography	619,380	5.0	22.6	30.0	42.0	0.3
Farms by Geography	9,965	5.4	25.5	31.1	37.9	0.2
Family Distribution by Income Level	758,405	22.5	17.3	18.3	41.9	0.0
Household Distribution by Income Level	1,204,889	24.4	16.1	17.1	42.3	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL		\$61,809	Median Housing Value			\$217,004
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$65,914	Median Gross Rent			\$1,232
			Families Below Poverty Level			10.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Florida

The Broward and Palm Beach County AA will receive a full-scope review as it is the bank's only AA in the state of Florida. The bank's level of lending to home mortgage and consumer lending is not meaningful in the state due to low volume, so the bank's performance will only be evaluated based on

the overall level of small business lending. Not included in our lending sample is the level of SBA PPP loans made as discussed above.

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Broward and Palm Beach County AA is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's geographic distribution of small loans to businesses of different sizes within the AA is considered excellent. During the evaluation period, the bank's level of lending in low- and moderate-income geographies exceeded aggregate lending for small loans to businesses. The level of lending to small businesses in low-income geographies was three times the aggregate level.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank's borrower distribution of small loans to businesses of different sizes within the AA is considered excellent. Overall, the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, as the bank's level of lending to business with revenues less than \$1 million exceeds the aggregate comparator. This analysis does not include loans issued through the SBA PPP

Responses to Complaints

There were no complaints related to the institution's CRA performance in the state during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2019 – 12/31/2021	
Bank Products Reviewed:	Home Mortgage, Small Business, and Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Georgia		
Coffee County AA	Full-scope	
Florida		
Broward and Palm Beach County AA	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	First National Bank of Coffee County
Overall Bank:	Lending Test Rating
First National Bank of Coffee County	Outstanding
MMSA or State:	
Georgia	Satisfactory
Florida	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

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

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

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

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

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

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

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

State of Georgia

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Coffee County AA	51	5,569	0.0	749	0.0	0.0	0.0	8.6	2.0	4.9	73.7	74.5	68.4	17.8	23.5	26.7	0.0	0.0	0.0
Total	51	5,569	0.0	749	0.0	0.0	0.0	8.6	2.0	4.9	73.7	74.5	68.4	17.8	23.5	26.7	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Coffee County AA	51	5,569	100.0	749	22.1	19.6	2.8	18.6	11.7	15.0	21.7	19.6	18.6	37.6	49.0	44.2	0.0	--	19.5
Total	51	5,569	100.0	749	22.1	19.6	2.8	18.6	11.7	15.0	21.7	19.6	18.6	37.6	49.0	44.2	0.0	--	19.5

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Coffee County AA	52	6,895	100.0	542	0.0	--	0.0	5.2	5.8	4.2	83.6	69.2	82.5	11.2	25.0	13.3	0.0	--	0.0
Total	52	6,895	100.0	542	0.0	--	0.0	5.2	5.8	4.2	83.6	69.2	82.5	11.2	25.0	13.3	0.0	--	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Coffee County AA	52	6,895	100.0	542	86.6	65.1	34.1	3.9	34.9	9.5	0.0
Total	52	6,895	100.0	542	86.6	65.1	34.1	3.9	34.9	9.5	0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Coffee County AA	60	569	100	0.0	0.0	7.4	2.5	78.7	74.9	13.9	22.5	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Coffee County AA	60	593	100	27.2	31.7	16.5	31.7	18.6	20.0	37.7	16.7	0.0	0.0	
Total	60	593	100	27.2	31.7	16.5	31.7	18.6	20.0	37.7	16.7	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

State of Florida

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Broward & Palm Beach Counties AA	60	\$59,949	100.0	170,035	5.0	15.0	5.9	22.6	26.7	23.1	30.0	33.3	29.1	42.0	25.0	41.6	0.3	0.0	0.3
Total	60	\$59,949	100.0	170,035	5.0	15.0	5.9	22.6	26.7	23.1	30.0	33.3	29.1	42.0	25.0	41.6	0.3	0.0	0.3

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Broward & Palm Beach Counties AA	60	59,949	100.0	170,035	92.7	84.6	40.8	2.7	15.4	4.6	0.0	
Total	60	59,949	100.0	170,035	92.7	84.6	40.8	2.7	15.4	4.6	0.0	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*