



PUBLIC DISCLOSURE

June 30, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Griffin
Charter Number: 15572

318 South Hill Street
Griffin, GA 30224

Office of the Comptroller of the Currency

Three Ravinia Drive
Suite 400
Atlanta, Georgia 30346

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 **Satisfactory**

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test is based on a full-scope review in the state of Georgia.
- First National Bank of Griffin (FNB or bank) exhibits an excellent geographic distribution of loans.
- The bank exhibits a reasonable distribution of home mortgages to individuals of different income levels and small loans to businesses of different sizes.
- A majority of bank loans were originated inside its assessment area (AA).
- The bank's lending reflects a reasonable level of responsiveness to the AA's credit needs.

Loan-to-Deposit Ratio

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

The Office of the Comptroller of the Currency (OCC) evaluated the bank's LTD ratio over 12 quarters from the quarter ended March 31, 2022, through the quarter ended December 31, 2024. During this period, the bank's quarterly LTD ratio averaged 34.8 percent, with a quarterly low of 28.6 percent at the quarter ended March 31, 2022, and a quarterly high of 45.4 percent as of December 31, 2024. In comparison, over the same 12 quarters, the quarterly average LTD ratio for similarly situated financial institutions was 46.1 percent and ranged from a low average of 29.8 percent to a high average of 68.1 percent. The bank's lending activity moved consistently with its peer banks in the AA, which generally increased during the evaluation period.

In determining the LTD ratio to be reasonable, certain factors were considered. During 2020, the bank experienced a significant increase in deposits due to COVID-19 stimulus payments and those deposits were maintained through a portion of the bank's evaluation period. Deposit levels peaked as of December 31, 2022, and have steadily declined. As deposit balances decreased, the bank's LTD ratio improved. The bank's excess liquidity was regularly invested in minority and low-income financial institutions, totaling \$1.8 million as of December 31, 2024, demonstrating management's commitment to community reinvestment during the evaluation period.

Lending in Assessment Area

A majority of the bank's loans were inside its AA.

The bank originated and purchased 68.5 percent of its total loans inside the bank's AA 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.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	96	66.67	48	33.33	144	13,849	45.03	16,909	54.97	30,758
Small Business	26	76.47	8	23.53	34	4,286	64.99	2,308	35.01	6,594
Total	122	68.54	56	31.46	178	18,135	48.55	19,217	51.45	37,352
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%										

Description of Institution

FNB is a nationally chartered community bank headquartered in Griffin, Georgia. The bank was established in 1933 and operates within the state of Georgia. FNB operates five full-service branches throughout central Georgia, including three branches in Griffin, Georgia, one branch in Locust Grove, Georgia, and one branch in Hampton, Georgia. In January 2022, the beginning of the evaluation period, FNB closed one branch located in Pike County, marking the only branch closure during the evaluation period. No branch opening and no merger or acquisition activities occurred during this evaluation period.

As of December 31, 2024, FNB reported \$360.6 million in total assets and tier 1 capital of \$36.2 million. Total loans and leases outstanding were \$145.6 million, representing 40.4 percent of total assets. The bank's loan portfolio composition was 35.9 percent non-farm non-residential loans, 23.2 percent one- to four-family residential loans, 14.5 percent construction and development loans, 13.6 percent commercial and industrial loans, 7.5 percent multifamily loans, 3.4 percent consumer loans, 1.8 percent farm loans, and 0.2 percent other loans and obligations.

FNB offers traditional banking products to consumers and businesses. Deposit products include checking accounts, savings accounts, negotiable order of withdrawal accounts, money market deposit accounts, and certificate of deposit accounts. Lending products include commercial real estate, commercial and industrial, home mortgage, consumer, and farm loans. Other services provided to customers include digital banking, which allows customers to view and manage their accounts, as well as the ability to initiate funds transfers. FNB offers automated teller machines and drive thru services with reasonable hours of operations. FNB's business strategy is not limited to any one product or service, but commercial banking represented FNB's primary line of business during the evaluation period.

During the evaluation period, the bank did not face any legal, financial, or other factors that impeded its ability to help meet the credit needs of its AA. FNB received an overall rating of "Satisfactory" at its prior CRA review dated June 6, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the CRA performance of FNB using Small Bank performance criteria, which includes a lending test. The Lending Test determines the distribution of the bank's primary loan products among different geographies and borrower characteristics within the bank's AA. The evaluation period for this performance evaluation covers January 1, 2022, through December 31, 2024.

To be considered a primary loan product for this evaluation, the bank must have originated at least 20 loans in the AA. Examiners conducted an analysis and determined the bank's primary lending products were home mortgages and small business loans. Therefore, examiners selected random samples of home mortgages and small business loans in the bank's sole rating area, the Atlanta metropolitan statistical area (MSA), which is part of the Atlanta-Sandy Springs-Roswell MSA, for the lending test analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable 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 based on a full-scope examination of the State of Georgia. The state rating is based on the bank's performance in its single AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Georgia: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits an excellent geographic distribution of loans.
- The bank exhibits a reasonable distribution of home mortgages among individuals of different income levels and small loans to businesses of different sizes.

Description of Institution's Operations in Georgia

FNB designated one AA, which includes the following contiguous counties: Henry, Pike, and Spalding. The AA is part of the Atlanta-Sandy Springs-Roswell MSA. According to the 2020 U.S. Census Bureau data, Henry, Pike, and Spalding counties (Atlanta MSA) contained 81 census tracts (CT), of which five were low-income CTs, 18 were moderate-income CTs, 42 were middle-income CTs, 14 were upper-income CTs, and two CTs had no income designation.

The population of the Atlanta MSA reported through the 2020 U.S. Census Bureau data was 326,907, of which 5.3 percent were low-income individuals and 22.0 percent were moderate-income individuals.

The median housing value of owner-occupied housing units for the Atlanta MSA was \$168,400. According to the 2020 U.S. Census Bureau demographic data, the number of housing units within the MSA was 117,631. Owner-occupied housing units and rental units represented 65.5 percent and 28.0 percent, respectively, with 6.4 percent of housing units vacant within the MSA.

The poverty level across the MSA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home mortgage loan. According to the 2020 U.S. Census Bureau, 10.4 percent of households in the Atlanta MSA had income below the federal poverty level.

The OCC evaluated the disparity between the median income of families within the MSA and the cost of housing. Low-income families earned less than \$3,415 per month, while moderate-income families earned \$3,416 to \$5,463 per month within the MSA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,024 for a low-income borrower and \$1,639 for a moderate-income borrower within the MSA. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the MSA using the median housing value would be \$902. Based on these calculations, some low-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the Atlanta MSA, but housing is generally affordable for low-and moderate-income (LMI) borrowers.

According to the 2024 Moody's Analytics report, the Atlanta MSA's strengths include its diverse economy, status as a distribution and cultural center, business-friendly environment, and large talent pool with healthy net migration. Economic drivers are logistics and technology. The upside noted fewer headwinds in the MSA impacting its growing tech sector as compared to nationally, but the downside noted lower housing affordability could dampen in-migration while tariffs and federal policy changes could impact key industries.

The unemployment rate for the Atlanta MSA at the beginning of the evaluation period was 3.4 percent, improving slightly to 3.3 percent by the end of the evaluation period, which was slightly lower than the statewide average of 3.4 percent and lower than the nationwide average of 3.8 percent. Major employers within the Atlanta MSA included Delta Air Lines Inc., Emory University & Emory Healthcare, and Piedmont Healthcare, each employing over 25,000 employees within the MSA.

FNB faces strong competition from large financial institutions in its AA. Based on the FDIC's deposit market share data as of June 30, 2024, the bank had \$323.6 million in deposits within the market, representing a 7.2 percent deposit market share and ranking it sixth out of 16 depository institutions doing business in the MSA. The largest depository institutions within the MSA included Wells Fargo Bank, Ameris Bank, and United Bank, with a combined market share of 43.3 percent.

The OCC communicated with one community contact, a non-governmental organization serving Henry County, Georgia, as part of the performance evaluation. The organization's focus is to drive sustainable and equitable improvements in the well-being of children, families, and individuals in the communities it serves. The contact noted challenges with transportation for LMI individuals, as well as affordable housing. Opportunities for institutions in the area include donating to community service-focused programs and funding affordable rental housing. While housing development is increasing, there is limited focus on projects that result in housing units affordable to LMI individuals.

Assessment Area – Atlanta MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	6.17	22.22	51.85	17.28	2.47
Population by Geography	326,907	5.27	22.04	53.30	18.02	1.37
Housing Units by Geography	117,631	5.76	24.82	52.27	15.25	1.89
Owner-Occupied Housing by Geography	77,072	2.32	21.71	55.24	19.74	0.99
Occupied Rental Units by Geography	32,988	11.80	32.22	46.09	6.05	3.83
Vacant Units by Geography	7,571	14.41	24.26	49.02	9.63	2.68
Businesses by Geography	18,606	5.83	19.28	56.72	16.62	1.55
Farms by Geography	608	3.45	20.39	58.55	15.79	1.81
Family Distribution by Income Level	81,102	22.57	19.28	23.41	34.73	0.00
Household Distribution by Income Level	110,060	22.53	18.16	20.89	38.42	0.00
Unemployment rate (%)	5.41	6.73	5.89	5.18	5.21	4.15
Households Below Poverty Level (%)	10.41	34.55	13.88	8.60	2.03	18.73
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD)		\$81,951	Median Housing Value			\$168,400
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD) for 2024		\$100,900	Median Gross Rent			\$1,154
			Families Below Poverty Level			8.48
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Georgia

FNB has one AA, which consists of the contiguous Georgia counties of Pike, Henry, and Spalding. A full-scope review was conducted for the AA.

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 Atlanta MSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table 7 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.

The geographic distribution of home mortgage loans was excellent.

The bank's lending in low-income geographies significantly exceeded both the percentage of owner-occupied housing units and aggregate lending performance. The bank's lending in moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units and the aggregate performance data.

Small Loans to Businesses

Refer to Table 9 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 geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses in low-income geographies significantly exceeded the number of small businesses and the aggregate performance reported by other lenders in these geographies. The percentage of small loans to businesses in moderate-income geographies significantly exceeded both the number of small businesses and the aggregate performance data.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. Examiners reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained or conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 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.

The distribution of home mortgage loans to borrowers of different income levels was reasonable.

The distribution of loans to low-income families exceeded the aggregate lending performance but was significantly below the percentage of low-income families. The distribution of loans to moderate-income families was near-to the percentage of moderate-income families and was below the aggregate lending performance. We considered relevant performance context such as a substantive percentage of families within the AA being below the poverty level and there being a lower percentage of owner-occupied

housing units within low-income geographies. Therefore, emphasis was placed on the bank's distribution of home mortgage loans relative to aggregate lending activity for our analysis of low-income borrowers within the AA.

Small Loans to Businesses

Refer to Table 10 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 distribution of small business loans to businesses of different sizes was reasonable.

The percentage of bank loans to small businesses with revenues less than or equal to \$1 million was below the percentage of small businesses in the AA but significantly exceeded the aggregate industry lending performance. When considering the high volume of small businesses within the AA, more emphasis was placed on the bank's distribution of loans to small businesses relative to the percentage of aggregate lending, as the aggregate lending activity indicates less demand for loans to small businesses within the AA.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home Mortgage and Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Atlanta MSA	Full-Scope	Henry, Pike, and Spalding Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First National Bank of Griffin	Satisfactory
MMSA or State:	
Georgia	Satisfactory

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/AA.

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. CTs 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 LMI individuals; community services targeted to LMI 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 LMI 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 CT 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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 state/AA.

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 (OMB), 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 (MSA): An area, defined by the OMB, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA 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.

Multistate Metropolitan Statistical Area (MMSA): Any MMSA or multistate combined statistical area, as defined by the OMB.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 MMSA. 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 MMSA, the institution will receive a rating for the MMSA.

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 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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 MMSA, 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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 AA.
- Table 10. 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 – 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Atlanta MSA	96	13,849	100.0	23,979	2.32	16.67	2.95	21.71	41.67	21.51	55.24	40.6	58.63	19.74	--	16.18	0.99	1.04	0.73
Total	96	13,849	100.0	23,979	2.32	16.67	2.95	21.71	41.67	21.51	55.24	40.6	58.63	19.74	--	16.18	0.99	1.04	0.73
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 – 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, “—” data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Atlanta MSA	96	13,849	100.0	23,979	22.57	10.42	8.19	19.28	19.79	22.72	23.41	15.63	26.55	34.73	27.08	22.29	--	27.08	20.23
Total	96	13,849	100.0	23,979	22.57	10.42	8.19	19.28	19.79	22.72	23.41	15.63	26.55	34.73	27.08	22.29	--	27.08	20.23
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 – 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, “—” data not available																			
Due to rounding, totals may not equal 100.0%																			

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 – 2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Atlanta MSA	30	4,507	100.0	20,179	5.83	13.33	5.01	19.28	36.67	21.62	56.72	46.67	55.98	16.62	0.00	16.17	1.55	3.33	1.23
Total	30	4,507	100.0	20,179	5.83	13.33	5.01	19.28	36.67	21.62	56.72	46.67	55.98	16.62	0.00	16.17	1.55	3.33	1.23
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 – 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, “—” data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta MSA	30	4,507	100.0	20,179	89.71	70.0	50.28	4.83	30.0	5.46	0.0
Total	30	4,507	100.0	20,179	89.71	70.0	50.28	4.83	30.0	5.46	0.0
Source: FFIEC File – 2020, 2024 Census; 1/1/2022 – 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, “—” data not available.											
Due to rounding, totals may not equal 100.0%											