



PUBLIC DISCLOSURE

August 1, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank & Trust
713138

12255 South Main Street, Trenton Georgia, 30752

Office of the Comptroller of the Currency

3 Ravinia Drive Suite 550, 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 **Outstanding**.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- Citizens Bank & Trust's (CB&T) loan-to-deposit ratio is reasonable given its size, financial condition and assessment area needs.
- A substantial majority of CB&T's loans were originated within its assessment area (AA).
- The distribution of home mortgage and consumer loans represents an excellent penetration of loans among individuals of different income levels.
- There is a reasonable dispersion of HMDA loans in Georgia among census tracts of different income levels.

Loan-to-Deposit Ratio

CB&T's average loan-to-deposit (LTD) ratio is reasonable and demonstrates the bank's commitment to lend within its AA. The average LTD ratio was calculated by averaging the bank's LTD ratios over the past 23 quarters from June 30, 2016, through the quarter ending December 31, 2021. During this period, CB&T's LTD ratio averaged 66.60 percent, with a quarterly high of 74.69 percent and a quarterly low of 55.62 percent. In comparison, over the same 23 quarters, the quarterly average LTD ratio among similarly sized financial institutions was 53.94 percent.

Lending in Assessment Area

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

During the evaluation period, 93 percent of loans by number and 88.3 percent of loans by dollar were originated within the bank's AAs. This analysis is performed at the bank, rather than the AA level.

Table D - 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	439	93.0	33	7.0	472	38,458	88.3	5,074	11.7	43,532
Consumer	37	92.5	3	7.5	40	261	82.3	56	17.7	317
Total	476	93.0	36	7.0	512	38,719	85.3	5,130	14.7	43,849
Source: Bank Data and HMDA data Due to rounding, totals may not equal 100.0%										

Description of Institution

CB&T is a wholly owned subsidiary of Tag Bancshares, Inc., a one-bank holding company. CB&T is a federally chartered stock savings association headquartered in Trenton, Dade County, Georgia, which is approximately 20 miles southwest of Chattanooga, Tennessee. The main office is a full-service banking location with an on-site automated teller machine (ATM). CB&T also operates two full-service branches in Lookout Mountain, Georgia and Higdon, Alabama. CB&T is a traditional stock association offering a wide range of products and services to its local customer base. Extended business hours are offered at each branch, with a drive-through teller available at each branch from 7:30am – 6:00pm Monday through Friday. Additionally, CB&T is open for customers on Saturdays, with branch hours from 9:00am – noon and drive-through teller hours from 7:30am – noon.

CB&T meets the needs of the local community and strategic initiatives through the offering of home mortgage loans, consumer loans, and commercial loans. At December 31, 2021, CB&T reported total assets of \$132.3 million and total equity capital of \$12.6 million. Net loans made up 49.7 percent of CB&T's total assets. Based on the number and dollar volume of loan originations from 2019 to 2021, our analysis of CB&T's lending included two primary loan types: home mortgage loans and consumer loans.

There are no legal or financial impediments that would hinder CB&T's ability to meet the credit needs of the communities it serves. CB&T received an "Outstanding" at the last CRA Evaluation dated June 06, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation is an assessment of CB&T's ability to meet the credit needs of its community. CB&T was evaluated using the Small Bank examination procedures, which includes a lending test. The evaluation period covered the period from January 1, 2019, to December 31, 2021.

To determine CB&T's primary lending products, examiners assessed the composition of loan originations during the evaluation period, which identified home mortgage and consumer loans, as primary loan products. To evaluate performance under the lending test, we reviewed all home mortgage loans originated between January 1, 2019, through and December 31, 2021, utilizing Home Mortgage Disclosure Act data. Additionally, we sampled 20 consumer loans per AA that were originated during the same period to evaluate CB&T's performance of meeting the needs of their AAs.

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. Home mortgage and consumer loans were the bank's primary loan products reviewed for the evaluation. The products were weighted equally in arriving at overall conclusions.

Refer to the "Scope" section under each state 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 (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: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The institution exhibits an excellent distribution of loans to individuals of different income levels.
- A majority of the institution's loans were made within the AA.
- The bank exhibits a reasonable geographic distribution of Home Mortgage Disclosure Act (HMDA)-reportable loans originated in the AA.
- No CRA-related complaints were received during the evaluation period.

Description of Institution's Operations in Georgia

CB&T's operations within the state of Georgia include its main branch located in Trenton and an additional branch located in Lookout Mountain. The AA is a combination of two contiguous counties: Dade County and Walker County. The AA does not arbitrarily exclude any low- or moderate-income

geographies and meets the requirements of the regulation. There are no low-income census tracts (CT), seven moderate-income CTs, eight middle-income CTs, and two upper-income CTs. According to the 2015 American Census Survey, the Georgia AA has a population of 84,730, with a median family income of \$58,694, with 13.2 percent of families in the AA living below the poverty level. There are eight federal and state chartered financial institutions in the Georgia AA. At June 30, 2021, CB&T ranked 3rd with total deposits of \$93 million, representing a 12 percent market share.

Dade County is located in Georgia's most northwestern corner of the state, bordering both Alabama and Tennessee. The county seat is Trenton, Georgia. According to the Georgia Department of Labor Area Labor Profile the total population was 16,251 with a total labor force of 8,049 based on the April 1, 2020, census and 2021 data from the Bureau of Labor Statistics, respectively. The unemployment rate is low at 2.6 percent. The majority of Dade County's industry mix is in providing services, partly due to the recreational appeal of its geographies, with Bull Moose Tube Co. being the largest employer in the county.

Walker County is located in northwest Georgia and borders Tennessee. The county seat is LaFayette, Georgia. According to the Georgia Department of Labor Area Labor Profile, the total population was 67,654, with a total labor force of 31,304 based on the April 1, 2020, census and 2021 data from the Bureau of Labor Statistics, respectively. The unemployment rate is low at 3.1 percent. The majority of Walker County's industry mix is in providing services, with a variety of national and international manufacturers operating in Walker County. Agriculture is also a top industry in the county, with farms occupying 30 percent of the land. BlueCross BlueShield of Tennessee is the largest employer in the county.

Georgia AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Citizens BK Trust GA AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	41.2	52.9	5.9	0.0
Population by Geography	84,730	0.0	41.6	50.3	8.1	0.0
Housing Units by Geography	37,359	0.0	45.2	48.4	6.4	0.0
Owner-Occupied Units by Geography	23,390	0.0	38.7	53.1	8.2	0.0
Occupied Rental Units by Geography	8,620	0.0	56.8	39.4	3.8	0.0
Vacant Units by Geography	5,349	0.0	55.0	42.4	2.6	0.0
Businesses by Geography	3,967	0.0	41.1	51.0	7.8	0.0
Farms by Geography	219	0.0	31.5	61.6	6.8	0.0
Family Distribution by Income Level	23,020	25.6	19.2	22.5	32.7	0.0
Household Distribution by Income Level	32,010	27.5	17.2	19.2	36.2	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$58,694	Median Housing Value			\$114,165
			Median Gross Rent			\$663
			Families Below Poverty Level			13.2%
Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

As part of the CRA evaluation, the OCC reviewed information from two community contacts within the bank's AA to determine local economic conditions and community needs. The contacts indicated a need for Covid-19 pandemic relief for small businesses and individuals to help ensure their viability post-pandemic and the need for affordable housing. The population includes a larger percentage of elderly residents. The contacts stated local banks have been very responsive to the needs of the area.

Scope of Evaluation in Georgia

CB&T designated Walker and Dade Counties as its AA, given the counties are contiguous and located within the Chattanooga MSA, we combined the counties for the purpose of this review.

Refer to the table in Appendix A: Scope of Examination for additional information

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the combined Walker and Dade County AA is outstanding.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Overall, the geographic distribution of loans during the evaluation period reflects reasonable dispersion within CB&T's AA. The level of home mortgage lending was compared to the aggregate peer mortgage data and owner-occupied housing unit data. There are no low-income tracts in the AA. The mountainous terrain of the AA separates the bank's two locations from many moderate income CTs within the AA, which provides reasonable context for performance within the moderate CTs trailing both aggregate lending and owner-occupied housing unit levels within moderate-income CTs. HMDA data indicated CB&T originated 23.9 percent of loans within the moderate-income CTs compared to the 35.1 percent of aggregate lending within the AA. While CB&T's geographic distribution of loans to LMI income census tracts in the AA is below the aggregate lending activity, it is within a reasonable range.

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.

Consumer Loans

Overall, the geographic distribution of loans during the evaluation period reflects reasonable dispersion within CB&T's AA. The level of consumer lending was compared to the aggregate peer consumer lending data and the percentage of LMI families living within the AA. Out of a sample of 20 consumer

loans, 40 percent of loans were made within the moderate-income CTs compared to the 43.6 percent of aggregate peer consumer lending within the AA.

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.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

CB&T's overall distribution of lending among borrowers of different income levels reflects excellent penetration, given local AA competition and demographic characteristics of the AA. The percentage of home mortgage lending to both low-and moderate-income borrowers during the evaluation period exceeded aggregate lending activity within the AA. When considering the number of families living below the poverty level, the 16.2 percent of bank's loans to low-income borrowers is reasonable compared to the 25.6 percent of low-income families. Within the AA, 19.2 percent of families reported moderate income while 26.2 percent of the bank's home mortgage loans were made to moderate income borrowers.

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.

Consumer Loans

During the 2019-2021 analysis period, the distribution of the bank's consumer loans to LMI borrowers reflects an excellent distribution. Low-income borrowers represented 27.5 percent of AA households while 40 percent of our sample of consumer loans were to low-income borrowers. Moderate-income borrowers represented 17.2 percent of households, while 40 percent of our sampled consumer loans were to moderate-income borrowers.

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.

State Rating

State of Alabama

CRA rating for the State of Alabama: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- Home mortgage and consumer lending to borrowers of different income levels in the AA shows an excellent distribution.

- A majority of the institution's loans were made within the AA.
- No CRA-related complaints received during the evaluation period.

Description of Institution's Operations in Alabama

CB&T has one full-service branch in the Alabama AA located in Higdon, Alabama. CB&T defines its Alabama AA as two contiguous counties in whole: Jackson County and DeKalb County. The AA does not arbitrarily exclude any low- or moderate-income geographies and meets the requirements of the regulation. The AA has no low-income CTs, no moderate-income CTs, 21 middle-income CTs, and 4 upper-income CTs. During 2020, 12 middle-income CTs located in DeKalb County were designated as distressed due to poverty. According to the 2015 American Census Survey, the Alabama AA has a population of 123,928, with a median family income of \$45,454, and 14.6 percent of families in the AA were living below the poverty level. There are 12 federal and state chartered financial institutions in the Alabama AA, with CB&T having the lowest deposit market share.

Jackson County is located in Alabama's most northeastern corner, bordering Georgia and Tennessee. The county seat is Scottsboro, Alabama, the total population was 52,579, with a total labor force of 22,975 based on the April 1, 2020, census and 2021 data from the Bureau of Labor Statistics, respectively. The unemployment rate was low at 2.9 percent. The largest industries in Jackson County are manufacturing and retail trade, followed by healthcare and social assistance.

DeKalb County is located in Alabama's most northeastern corner, bordering Georgia and Tennessee. The county seat is Fort Payne, Alabama, the total population is 71,608 with a total labor force of 31,097 based on the April 1, 2020, census and 2021 data from the Bureau of Labor Statistics, respectively. The unemployment rate was low at 2.5 percent. The largest industries in DeKalb County are industrial in nature and the largest employer in the county is Koch Foods, Inc.

The evaluation considers the input from one community contact with a social organization. The individual noted a need for affordable housing and transportation within the AA. The interviewee indicated periodic projects arise to assist in servicing the communities needs and area banks are typically helpful in assisting the organization in its funding needs.

Alabama AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Citizens BK Trust AL AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	0.0	84.0	16.0	0.0
Population by Geography	123,928	0.0	0.0	84.7	15.3	0.0
Housing Units by Geography	55,816	0.0	0.0	85.6	14.4	0.0
Owner-Occupied Units by Geography	33,347	0.0	0.0	81.9	18.1	0.0
Occupied Rental Units by Geography	12,097	0.0	0.0	92.8	7.2	0.0
Vacant Units by Geography	10,372	0.0	0.0	89.2	10.8	0.0
Businesses by Geography	5,740	0.0	0.0	82.7	17.3	0.0
Farms by Geography	373	0.0	0.0	85.8	14.2	0.0

Family Distribution by Income Level	31,856	19.6	18.5	21.4	40.5	0.0
Household Distribution by Income Level	45,444	22.7	15.6	17.7	44.1	0.0
Median Family Income Non-MSAs - AL		\$45,454	Median Housing Value			\$98,736
			Median Gross Rent			\$558
			Families Below Poverty Level			14.6%
Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Alabama

CB&T designated DeKalb and Jackson Counties as its AA, given the counties are contiguous and not located within an MSA, we combined the counties for the purpose of this review.

Refer to the table in Appendix A: Scope of Examination for additional information.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the combined DeKalb and Jackson County AA is outstanding.

Distribution of Loans by Income Level of the Geography

There are no low- or moderate-income CTs located in the Alabama AA. Therefore, a meaningful analysis of the geographic distribution of loans could not be performed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels in the state.

Home Mortgage Loans

CB&T's overall distribution of lending among borrowers of different income levels reflects excellent penetration, given local AA competition and demographic characteristics of the AA. The percentage of home mortgage lending to both low-and moderate-income borrowers during the evaluation period exceeded aggregate lending activity within the AA. When considering the number of families living below the poverty level, 11.2 percent of bank's home mortgage loans to low-income borrowers is reasonable compared to the 19.6 percent of low-income families within the AA. Additionally, aggregate lending to low-income borrowers was 4.3 percent. Within the AA, 18.5 percent of families reported

moderate income while 15.6 percent of the bank's home mortgage loans were made to moderate income borrowers. The bank's home mortgage lending exceeded the aggregate AA lending of 14.3 percent.

Refer to Table P in the state of Alabama 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.

Consumer Loans

During the 2019-2021 analysis period, the distribution of the bank's consumer loans to LMI borrowers reflects an excellent distribution. Low-income borrowers represented 22.7 percent of AA households while considering the number of families living below the poverty level, 15 percent of the sampled consumer loans were to low-income borrowers. However, moderate-income borrowers represented 15.6 percent of households, while 30 percent of sampled consumer loans were to moderate-income borrowers.

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

Responses to Complaints

During the evaluation period, neither CB&T nor the OCC Customer Assistance Group received any complaints related to the bank's CRA performance.

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:	January 1, 2019 – December 31, 2021	
Bank Products Reviewed:	Home Mortgage and Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State: Georgia		
	Full-Scope	<i>All geographies in Dade and Walker Counties</i>
State: Alabama		
	Full-Scope	<i>All geographies in DeKalb and Jackson Counties</i>

Appendix B: Summary of MMSA and State Ratings

RATINGS (BANK NAME)	
Overall Bank:	Lending Test Rating
Outstanding	Outstanding
State: Georgia	Outstanding
State: Alabama	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 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.

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
AL Non MSA AA	205	17,155	46.7	3,215	0.0	0.0	0.0	0.0	0.0	0.0	81.9	89.8	75.7	18.1	10.2	24.3	0.0	0.0	0.0
GA Walker and Dade County	234	21,303	53.3	3,597	0.0	0.0	0.0	38.7	23.9	35.9	53.1	75.6	53.0	8.2	0.4	11.0	0.0	0.0	0.0
Total	439	38,458	100.0	6,812	0.0	0.0	0.0	16.0	12.8	19.0	70.0	82.2	63.7	14.0	5.0	17.3	0.0	0.0	0.0

Source: 2015 ACS; 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
AL Non MSA AA	205	17,155	46.7	3,215	19.6	11.2	4.1	18.5	15.6	14.0	21.4	23.9	21.2	40.5	47.8	41.5	0.0	1.5	19.2
GA Walker and Dade County	234	21,303	53.3	3,597	25.6	16.2	8.6	19.2	26.1	22.8	22.5	19.2	21.8	32.7	33.8	26.1	0.0	4.7	20.7
Total	439	38,458	100.0	6,812	22.1	13.9	6.5	18.8	21.2	18.7	21.9	21.4	21.5	37.2	40.3	33.4	0.0	3.2	20.0

Source: 2015 ACS; Bank Data, 2021 HMDA 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													2019-2021
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
Citizens BK Trust AL AA 2021	20	140,045	46.0	0.0	0.0	0.0	0.0	84.8	100.0	15.2	0.0	0.0	0.0
Citizens BK Trust GA MSA 2021	20	119,210	54.0	0.0	0.0	43.6	40.0	49.4	60.0	7.0	0.0	0.0	0.0
Total	40	259,255	100.0	0.0	0.0	18.0	18.4	70.2	81.6	11.8	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%													

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
Citizens BK Trust AL AA 2021	20	140,045	54.0	22.7	15.0	15.6	30.0	17.7	30.0	44.1	25.0	0.0	0.0
Citizens BK Trust GA MSA 2021	20	119,210	46.0	27.5	40.0	17.2	40.0	19.2	5.0	36.2	15.0	0.0	0.0
Total	40	259,255	100.0	24.7	26.5	16.2	34.6	18.3	18.5	40.8	20.4	0.0	0.0
Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%													