



PUBLIC DISCLOSURE

April 8, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Georgia National Bank
Charter Number 23547

350 West Belmont Drive
Calhoun, Georgia 30701

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 rating is based on the majority of the North Georgia National Bank (NGNB or bank) lending is inside of its assessment area (AA).
- NGNB loan to deposit (LTD) ratio is reasonable.
- The bank exhibits reasonable geographic distribution of loans in its AA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 57.7 percent over the past twelve quarters from December 31, 2020, to December 31, 2022. The bank's quarterly LTD ratio ranged from a high of 68.5 in March 2020 percent to a low 52.4 percent in December 2021.

We compared the bank's LTD ratio to two similarly situated banks with total assets of \$278 million and \$313 million, respectively. The quarterly average LTD ratio of the similarly situated banks during the same period was 59.6 percent, with a high of 73.9 percent and a low of 45.3 percent.

During the evaluation period, the Residential Lending Department, originated home loan applications and collected the corresponding requested material for submission to third parties for underwriting, approval processing, and funding. The one lender the bank employs for this process originated 137 home mortgage loans at approximately \$29.8 million in Gordon County during the evaluation period.

Lending in Assessment Area

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

The bank originated and purchased 64.2 percent of its total loans by number and 49.9 percent by dollar volume 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.

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	38	63.3	22	36.7	60	5,048	49.5	5,146	50.5	10,194
Small Business	39	65.0	21	35.0	60	5,914	50.2	5,862	49.8	11,776
Total	77	64.2	43	35.8	120	10,962	49.9	11,008	50.1	21,970

Description of Institution

North Georgia National Bank (NGNB) is a single state community bank, headquartered in Calhoun, Georgia. NGNB is wholly owned by North Georgia Community Financial Partners, Inc., a one bank holding company, which is also headquartered in Calhoun, GA. NGNB is the only locally owned bank headquartered in Gordon County. As of December 31, 2022, NGNB reported \$210.3 million in total assets, \$200.6 million in deposits and tier 1 capital of \$7.7 million. As of December 31, 2022, NGNB reported \$108.2 million in outstanding loans. The loan portfolio consisted of 50.7 percent commercial loans, and 39.3 percent home mortgage loans.

NGNB has delineated Calhoun, Gordon County as its only AA in the state of Georgia. Gordon County is in a non-MSA Micropolitan area. As of June 30, 2022, NGNB operated two full-service branches in Calhoun, Georgia. During the evaluation period, there were no branch closures and/or openings. Bank operations include five non-deposit taking Automatic Teller Machines (ATMs). Four of the ATMs are in Calhoun, Georgia and one is in Dalton, Georgia. The bank has one loan production office (LPO) which opened September 2, 2022, in Dalton, Whitfield County, Georgia. In downtown Calhoun the bank operates a Mortgage Center for the purpose of taking mortgage loan applications and conducting banking operations. In the Gordon County there are nine banks in the market and NGNB has a 17.0 percent deposit market share, while ranking second in the market.

Primarily, NGNB offers small business loans followed by home mortgage loans. The bank is not a Home Mortgage Disclosure Act (HMDA) reporter; therefore, it is exempt from the HMDA reporting requirements. The bank offers traditional loan and deposit products. Other loan products offered by the bank include home equity loans, farm loans, and consumer loans. Commercial loans and construction loans are offered for both business and personal needs. Banking deposit products includes consumer and business checking accounts, savings accounts, and money market accounts. Other banking deposit services include online banking, mobile banking, and bill pay.

During the evaluation period, there were no financial or legal impediments hindering the bank's ability to meet the credit needs of its AA. The bank did not have any merger or acquisition activity during the evaluation period. The bank received a Satisfactory rating using Small Bank procedures as of the previous CRA Performance Evaluation dated January 27, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this examination is January 1, 2021, through December 31, 2022. We determined NGNB's primary loan products by the number and dollar volume of loan originations and purchases during the evaluation period are small business loans and home mortgage loans. Bank management provided small business and home mortgage information for 2020, 2021, and 2022. To analyze the bank's small business and home mortgage lending performance examiners selected a sample of small business loans and home mortgage loans. The analysis includes a review of geographic distribution of lending by census tracts and the level of lending to businesses of different sizes and borrowers of different income levels.

Selection of Areas for Full-Scope Review

As of December 31, 2022, NGNB delineated one AA in the state of Georgia, Calhoun, Gordon County is a non-MSA. The AA will receive a full-scope review. There are no limited-scope AAs for the evaluation period. Community profiles for the AA is provided in the "Scope" sections for the State of Georgia. Refer to appendix A, Scope of Examination, for a list of full- scope AAs.

Ratings

The bank has one rating area, the state of Georgia. The bank's overall rating is based on the full-scope review of the Gordon County AA. Small business lending and home mortgage lending received equal weight in the analysis, as the loan products were the greatest by number and volume of loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 Georgia¹: Satisfactory

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of small business and home mortgage loans in the Gordon County AA.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels in its AA.
- The bank exhibits reasonable distribution of loans to small businesses of different sizes in its AA.

Description of Institution's Operations in Georgia

NGNB has two full-service branches and one LPO in Gordon County. There are no deposit taking ATMs in the AA. There were no branch openings or closings during the evaluation period. The total dollar volume of deposits is \$188 million, in the Gordon County market. NGNB has been in the market for 25 years and has a strategic focus to serve the customers of the county and nearby communities with their banking needs.

According to the 2020 U.S. Census and Dun & Bradstreet data the Gordon County AA includes 15 census tracts (CTs), four moderate-, six middle-, and five upper-income CTs. The AA does not have any low-income CTs. The population of Gordon County was 57,544 with 14,905 families, according to the 2020 Census data. Approximately 17.9 percent of the families in the AA are low-income and 20.8 percent are moderate-income. Approximately 11.7 percent of the families live below the poverty level. The median family income in the AA is \$55,969 for the evaluation period.

Gordon County is in the northwestern part of the state of Georgia. The Georgia Department of Labor or Bureau of Labor Statistics states that as of December 2022, the unemployment rate in AA was 2.8 percent. This is lower than the unemployment rate of 3.3 percent for the State of Georgia for the same period.

According to the Georgia Department of Labor, the largest industries within Gordon County are manufacturing, health care, retail trade, wholesale trade, and food services. Per Gordon County's annual report for the fiscal year, the largest employers within the AA were Mohawk Industries, Advent Health Gordon, Shaw Industries Group, Gordon County Schools, and Mannington Commercial.

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.

NGNB competition is from other financial institutions and financial services providers within its AA. Competition in the market is from two large banks, three regional banks, and three community banks. Besides NGNB, eight FDIC-insured financial institutions each have one branch location throughout Gordon County. As of June 30, 2022, the top three banks based on total deposits in Gordon County were Synovus Bank (\$388 million), NGNB (\$188 million), and Truist Bank (\$127 million). Overall, NGNB ranks second in total deposits out of the FDIC-insured financial institutions operating in Gordon County.

The OCC relied upon information from a community contact with a county organization focused on community services in LMI areas. The community contact identified the following needs within the Gordon County AA:

- Financial literacy programs
- Low-cost deposit products
- Low interest rate loans
- Affordable housing

Gordon County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Gordon County AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	26.7	40.0	33.3	0.0
Population by Geography	57,544	0.0	25.2	39.1	35.7	0.0
Housing Units by Geography	22,730	0.0	25.3	39.7	35.0	0.0
Owner-Occupied Units by Geography	13,633	0.0	18.7	41.6	39.7	0.0
Occupied Rental Units by Geography	6,813	0.0	38.5	33.5	28.0	0.0
Vacant Units by Geography	2,284	0.0	25.0	46.5	28.4	0.0
Businesses by Geography	4,601	0.0	31.6	34.8	33.6	0.0
Farms by Geography	266	0.0	22.6	39.1	38.3	0.0
Family Distribution by Income Level	14,905	17.9	20.8	18.4	42.9	0.0
Household Distribution by Income Level	20,446	19.7	16.0	18.8	45.5	0.0
Median Family Income Non-MSAs - GA		\$55,969	Median Housing Value			\$146,834
			Median Gross Rent			\$736
			Families Below Poverty Level			11.7%
<i>Source: 2020 U.S. Census and 2022 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 OCC conducted a full-scope review for the Calhoun, Gordon County AA in the state of Georgia. There were no limited scope AA reviews in the state. Small business loans and home mortgage loans

received equal weight in the lending analysis.

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 Gordon 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.

The geographic distribution of home mortgage loans is excellent. There are no low-income census tracts in Gordon County. During 2020 and 2021, the geographic distribution of home mortgage loans in moderate-income census tracts exceeded both the percentage of owner-occupied housing and aggregate lending performance in the AA. In 2022, the bank's lending in moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending performance 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.

NGNB exhibits a reasonable geographic distribution of business loans in the Gordon County AA. There are no low-income census tracts in the Gordon County AA. In the 2020 – 2021 analysis, the percentage of small loans to businesses originated or purchased in moderate-income CTs significantly exceeded both the demographic and the aggregate performance data. In the 2022 analysis, the percentage of small loans to businesses originated or purchased in moderate-income was below both the demographic and the aggregate performance data.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NGNB's small business loans during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 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.

The distribution of home mortgage loans to borrowers of different income levels is reasonable. During 2020 and 2021, the distribution of loans to low-income borrowers is significantly below the percentage of low-income families but is near aggregate lending performance in the AA. The distribution of loans to moderate-income borrowers is below the percentage of moderate-income families but is near aggregate lending performance in the AA. During 2022, the distribution of loans to low-income borrowers is significantly below the percentage of low-income families but near aggregate lending performance in the AA. The distribution of loans to moderate-income borrowers is below both the percentage of moderate-income families and aggregate lending performance in the AA. Approximately, 38.7 percent of families in the AA report low- or moderate-income.

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.

NGNB exhibits an overall excellent distribution of small loans to businesses of different sizes. An analysis compared the percentage distribution of the number of small loans to businesses originated or purchased by the bank by gross annual revenue level to businesses with gross annual revenues of \$1 million or less demographic data. During the evaluation period the bank exceeded both the percentage of small loans to businesses and the aggregate data.

Paycheck Protection Program Loans

During the Covid-19 pandemic, the SBA offered Paycheck Protection Program (PPP) loans under the CARES Act to small businesses throughout the country. The PPP was designed to maintain and stabilize small businesses during the pandemic. During the evaluation period and to address the lending needs of small businesses during the COVID-19 pandemic, NGNB originated 129 PPP loans in 2020 totaling \$8.3 million and originated 76 PPP loans totaling \$2.7 million in 2021.

Responses to Complaints

NGNB and the OCC has not received any complaints regarding NGNB's performance in helping to meet the Gordon County AA credit needs during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

There are no limited scope areas for review during this 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:	January 1, 2020, to December 31, 2022	
Bank Products Reviewed:	Home Mortgage, Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Non-MSA		
Gordon County	Full-Scope	All Gordon County Census Tracts
State: Georgia		
Gordon County	Full-Scope	All Gordon County Census Tracts

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)

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
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	
Gordon County AA 2021	20	2,878	100.0	2,608	0.0	0.0	0.0	8.2	15.0	9.4	77.4	60.0	76.3	14.4	25.0	14.3	0.0	0.0	0.0	
Total	20	2,878	100.0	2,608	0.0	0.0	0.0	8.2	15.0	9.4	77.4	60.0	76.3	14.4	25.0	14.3	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
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	
Gordon County AA 2022	20	2,552	0.0	1,978	0.0	0.0	0.0	18.7	50.0	24.8	41.6	20.0	38.7	39.7	30.0	36.5	0.0	0.0	0.0	
Total	20	2,552	0.0	1,978	0.0	0.0	0.0	18.7	50.0	24.8	41.6	20.0	38.7	39.7	30.0	36.5	0.0	0.0	0.0	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Gordon County AA 2021	20	2,878	100.0	2,608	20.2	5.0	3.0	19.0	15.0	14.3	19.2	20.0	21.4	41.7	60.0	39.6	0.0	0.0	21.7	
Total	20	2,878	100.0	2,608	20.2	5.0	3.0	19.0	15.0	14.3	19.2	20.0	21.4	41.7	60.0	39.6	0.0	0.0	21.7	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
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
Gordon County AA 2022	20	2,552	0.0	1,978	17.9	5.0	4.2	20.8	20.0	16.6	18.4	10.0	25.1	42.9	65.0	35.3	0.0	0.0	18.8
Total	20	2,552	0.0	1,978	17.9	5.0	4.2	20.8	20.0	16.6	18.4	10.0	25.1	42.9	65.0	35.3	0.0	0.0	18.8

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21	
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	
Gordon County AA 2021	20	3,739	100.0	841	0.0	0.0	0.0	20.1	35.0	19.9	68.7	45.0	68.7	11.2	20.0	11.4	0.0	0.0	0.0	
Total	20	3,739	100.0	841	0.0	0.0	0.0	20.1	35.0	19.9	68.7	45.0	68.7	11.2	20.0	11.4	0.0	0.0	0.0	

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
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
Gordon County AA 2022	20	3,827	100.0	865	0.0	0.0	0.0	31.6	25.0	32.9	34.8	35.0	34.7	33.6	40.0	32.4	0.0	0.0	0.0
Total	20	3,827	100.0	865	0.0	0.0	0.0	31.6	25.0	32.9	34.8	35.0	34.7	33.6	40.0	32.4	0.0	0.0	0.0

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
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
Gordon County AA 2021	20.0	3,739	100.0	841	84.9	95.0	41.5	3.5	5.0	11.6	0.0
Total	20.0	3,739	100.0	841	84.9	95.0	41.5	3.5	5.0	11.6	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
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
Gordon County AA 2022	20	3,827	100.0	865	86.3	95.0	43.0	3.1	5.0	10.6	0.0
Total	20	3,827	100.0	865	86.3	95.0	43.0	3.1	5.0	10.6	0.0
<i>Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.