

PUBLIC DISCLOSURE

February 26, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Georgia Community Bank
Certificate Number: 35320

250 East Lee Street
Dawson, Georgia 39842

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

10 10th Street NE, Suite 900
Atlanta, Georgia 30309-3849

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

TABLE OF CONTENTS

| | |
|---|----|
| INSTITUTION RATING..... | 1 |
| DESCRIPTION OF INSTITUTION..... | 2 |
| DESCRIPTION OF ASSESSMENT AREAS | 3 |
| SCOPE OF EVALUATION | 4 |
| CONCLUSIONS ON PERFORMANCE CRITERIA | 6 |
| DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW | 8 |
| ALBANY MSA ASSESSMENT AREA – Full-Scope Review | 9 |
| NON-MSA ASSESSMENT AREA – Full-Scope Review | 16 |
| MACON MSA ASSESSMENT AREA – Limited-Scope Review | 22 |
| APPENDICES..... | 26 |
| SMALL BANK PERFORMANCE CRITERIA | 26 |
| GLOSSARY | 27 |

INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment areas' credit needs.
- A majority of loans are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes.
- The institution has not received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

Georgia Community Bank is a state-chartered community bank headquartered in Dawson, Terrell County, Georgia (GA). The bank remains wholly owned by Georgia Community Bancorp, Inc., a one-bank holding company, located in Albany, Dougherty County, GA. Georgia Community Bank (formerly Bank of Terrell) received a “Satisfactory” rating at its previous FDIC CRA Performance Evaluation, dated December 6, 2017, based on Interagency Small Institution Examination Procedures.

Since the previous evaluation, the bank engaged in merger activity through its holding company. Specifically, Georgia Community Bancorp, Inc., changed from a three- to a one-bank holding company. On October 20, 2019, Georgia Community Bancorp, Inc., collapsed the bank charter of its subsidiary, The Citizens State Bank of Taylor County, and merged it with Bank of Terrell. The Citizens State Bank of Taylor County operated two full-service locations: the main office in Reynolds, Taylor County, GA, and one branch in Roberta, Crawford County, GA. Further, on December 9, 2019, Georgia Community Bancorp, Inc., collapsed the bank charter of its other subsidiary, Commercial State Bank, and merged it with Bank of Terrell. Commercial State Bank operated two full-service locations: the main office in Donalsonville, Seminole County, GA, and one branch in Blakely, Early County, GA. Effective with the merger activity, the holding company changed Bank of Terrell’s name to Georgia Community Bank.

Georgia Community Bank currently operates seven full-service locations. At the previous evaluation, Georgia Community Bank operated two locations: the main office in Dawson, Terrell County, GA, and one full-service branch in Albany, Lee County, GA. As a result of the October and December 2019 merger activity, Georgia Community Bank operates an additional four, full-service locations: one branch in Reynolds, Taylor County, GA; one branch in Roberta, Crawford County, GA; one branch in Donalsonville, Seminole County, GA; and one branch in Blakely, Early County, GA. Further, on March 15, 2021, Georgia Community Bank opened a full-service branch in Albany, Dougherty County, GA. Georgia Community Bank also continues to operate a limited-service drive-thru facility in Dawson, GA. Lastly, on October 3, 2023, Georgia Community Bank opened a loan production office in Warner Robins, Houston County, GA.

Georgia Community Bank is primarily a residential lender, followed by commercial and farm lending, which remains unchanged since the previous evaluation. Georgia Community Bank offers a variety of home mortgage, commercial, farm, and consumer loan products. The bank also brokers residential mortgage loans through third-party lending arrangements. In addition, Georgia Community Bank provides a variety of deposit products, including checking, savings, insured money management accounts, and certificates of deposit accounts. Alternative banking services include online banking, mobile banking, and access to interactive teller machines and automated teller machines.

As of the December 31, 2023, Consolidated Reports of Condition and Income (Call Report), Georgia Community Bank had total assets of \$379.3 million, total loans of \$250.0 million, and total deposits of \$333.4 million. As shown in the following table, residential loans (1-4 family and multifamily residential properties) represented the largest category of the loan portfolio at 43.1 percent. Commercial loans (loans secured by non-farm/non-residential properties and commercial

and industrial loans) represented the second largest category of the loan portfolio at 24.5 percent. Farm loans (loans secured by farmland and agricultural loans) represented the third largest category of the loan portfolio at 21.8 percent. Consumer loans represented a nominal amount of the loan portfolio at 4.2 percent.

| Loan Portfolio Distribution as of 12/31/2023 | | |
|---|-----------------|--------------|
| Loan Category | \$(000s) | % |
| Construction, Land Development, and Other Land Loans | 14,554 | 5.8 |
| Secured by Farmland | 22,563 | 9.0 |
| Secured by 1-4 Family Residential Properties | 106,481 | 42.6 |
| Secured by Multifamily (5 or more) Residential Properties | 1,319 | 0.5 |
| Secured by Nonfarm Nonresidential Properties | 30,634 | 12.3 |
| Total Real Estate Loans | 175,551 | 70.2 |
| Commercial and Industrial Loans | 30,538 | 12.2 |
| Agricultural Production and Other Loans to Farmers | 32,062 | 12.8 |
| Consumer Loans | 10,404 | 4.2 |
| Obligations of State and Political Subdivisions in the U.S. | 937 | 0.4 |
| Other Loans | 519 | 0.2 |
| Lease Financing Receivable (net of unearned income) | - | - |
| Less: Unearned Income | - | - |
| Total Loans | 250,011 | 100.0 |
| <i>Source: Call Report</i> | | |

Examiners did not identify any financial, legal, or other impediments that would limit the institution's ability to meet the credit needs of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA regulation requires each financial institution to define one or more assessment area(s) within which its CRA performance will be evaluated. The FDIC evaluates the bank's CRA performance based on its activity within the defined assessment area(s). Georgia Community Bank has delineated three assessment areas within the state of Georgia: a portion of the Albany, GA Metropolitan Statistical Area (Albany MSA); a Georgia Non-MSA (Non-MSA); and a portion of the Macon-Bibb County, GA MSA (Macon MSA).

The Albany MSA assessment area continues to consist of Dougherty, Lee, and Terrell counties. Georgia Community Bank added the Non-MSA and Macon MSA assessment areas as a result of the October and December 2019 merger activity. The Non-MSA assessment area consists of Early, Seminole, and Taylor counties. Early County and Seminole County are contiguous, while Taylor County is non-contiguous to the two counties. However, Early, Seminole, and Taylor counties have similar characteristics and demographics, and are, therefore, combined into one assessment area for this evaluation. The Macon MSA assessment area consists of Crawford County.

Assessment area delineations are based on available census data. The 2010 United States (U.S.) Census data was used at the previous evaluation to delineate the Albany MSA assessment area. In February

2017, the Federal Financial Institutions Examination Council (FFIEC) released updates to MSA and Metropolitan Divisions, states, counties, census tracts, and income-level classifications based on data collected from the 2011-2015 American Community Survey (ACS) Census. As a result of the 2015 ACS Census data, census tract designations changed, which impacted the Albany MSA assessment area. The 2015 ACS Census data was also used when the bank added the Non-MSA assessment area and Macon MSA assessment area in October and December 2019. Further, in 2022, the FFIEC released subsequent updates to MSA and Metropolitan Divisions, states, counties, census tracts, and income-level designations based on data collected during the 2020 U.S. Census. As a result of the 2020 U.S. Census, census tract designations changed, which impacted all three assessment areas. Refer to each assessment area section of this performance evaluation for additional information.

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the prior evaluation, dated December 6, 2017, to the current evaluation, dated February 26, 2024. Examiners used the Interagency Small Institution Examination Procedures to evaluate Georgia Community Bank’s CRA performance. These procedures include the CRA Small Bank Lending Test. Refer to the *Appendices* section for information regarding the Lending Test.

Examiners evaluated Georgia Community Bank’s lending data, deposit activity, and number of branches to determine the review level and weighting of the assessment areas in the overall conclusions. As such, examiners conducted full-scope reviews of the Albany MSA and Non-MSA assessment areas. Examiners conducted a limited-scope review of the Macon MSA assessment area. Further, a significant majority of lending and deposit activity was in the Albany MSA assessment area. Therefore, examiners gave greater weight in assigning conclusions to performance to the Albany MSA assessment area, followed by the Non-MSA and Macon MSA assessment areas.

The following table details Georgia Community Bank’s loans, deposits, and branches by assessment area.

| Assessment Area Breakdown of Loans, Deposits, and Branches | | | | | | |
|--|---------------|--------------|----------------|--------------|----------|--------------|
| Assessment Area | Loans | | Deposits | | Branches | |
| | \$(000s) | % | \$(000s) | % | # | % |
| Albany MSA | 43,195 | 74.2 | 170,604 | 50.4 | 3 | 42.9 |
| Non-MSA | 11,934 | 20.5 | 138,166 | 40.8 | 3 | 42.9 |
| Macon MSA | 3,093 | 5.3 | 29,666 | 8.8 | 1 | 14.2 |
| Total | 58,222 | 100.0 | 338,436 | 100.0 | 7 | 100.0 |
| <i>Source: Bank Data; FDIC Summary of Deposits (6/30/2023)</i> | | | | | | |

Activities Reviewed

Examiners determined Georgia Community Bank’s major product lines are home mortgage, small business, and small farm loans. This conclusion considered Georgia Community Bank’s business

strategy and the distribution of the loan portfolio. No other loan types, such as consumer loans, represent a major product line in the loan portfolio; therefore, other loan types were not reviewed for the current evaluation.

Georgia Community Bank is subject to the Home Mortgage Disclosure Act (HMDA) reporting requirements. Examiners considered all home mortgage loans originated on the bank's 2021 and 2022 Loan Application Registers (LAR) as part of the lending analysis. In 2021, the bank reported 354 loans totaling approximately \$32.3 million. In 2022, the bank reported 328 loans totaling approximately \$32.1 million. Examiners compared the bank's home mortgage lending to aggregate HMDA data and to 2020 U.S. Census demographic data as a standard of comparison. Examiners only presented 2022 HMDA data in tables within the conclusions sections (*Geographic Distribution* performance and *Borrower Profile* criterion), as it is the most recent year that aggregate data is available. In addition, there were no significant trends identified between 2021 and 2022 home mortgage lending that materially affected conclusions.

The CRA evaluation also includes an analysis of small business and small farm loans, as defined in the *Glossary*. Georgia Community Bank is not required to collect and report small business and small farm data, and has elected not to do so. Therefore, the evaluation period for small business and small farm lending was from January 1, 2023, through December 31, 2023.

For small business lending, Georgia Community Bank originated 219 small business loans totaling approximately \$13.8 million during the evaluation period. The universe of small business loans was evaluated for the *Assessment Area Concentration* and *Geographic Distribution* performance. Since gross annual revenues were not readily available, a sample of small business loans was evaluated for the *Borrower Profile* criterion. For small farm lending, Georgia Community Bank originated 52 small farm loans totaling approximately \$5.0 million during the evaluation period. The universe of small farm loans was evaluated for the *Assessment Area Concentration*, *Geographic Distribution*, and *Borrower Profile* criterion. Small business and small farm lending was compared to 2023 Dun & Bradstreet (D&B) data as a standard of comparison.

The following table provides details regarding the universe and samples selected for each loan category.

| Loan Products Reviewed | | | | |
|---|----------|----------|----------|----------|
| Loan Category | Universe | | Reviewed | |
| | # | \$(000s) | # | \$(000s) |
| Home Mortgage | 682 | 64,421 | 682 | 64,421 |
| Small Business | 219 | 13,821 | 143 | 8,869 |
| Small Farm | 52 | 4,983 | 52 | 4,983 |
| Source: 2021-2022 HMDA LARs; 2023 Small Business and Small Farm Bank Data | | | | |

Examiners reviewed the number and dollar volume of home mortgage, small business, and small farm loans. While the number and dollar volume of loans are presented, examiners emphasized performance by the number of loans since it is a better indicator of the number of individuals, businesses, and farms served. Considering the bank's primary lending focus and lending volume, home mortgage loans received greater weight in determining overall conclusions. Small business

and small farm loans received less weight. In addition, for all loan products reviewed, the *Geographic Distribution* performance and *Borrower Profile* criterion only include loans originated inside the assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Lending Test is rated Satisfactory. The rating is supported by a reasonable loan-to-deposit ratio, a majority of loans originated inside the assessment areas, reasonable dispersion of loans throughout the assessment areas, and reasonable penetration of loans to borrowers of different income levels and businesses and farms of different sizes. In addition, the bank has not received any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

Georgia Community Bank's net loan-to-deposit (NLTD) ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment areas' credit needs. Georgia Community Bank's NLTD ratio, calculated from Call Report data, averaged 74.1 percent over the past 25 calendar quarters from December 31, 2017 to December 31, 2023. The ratio fluctuated from a low of 57.6 percent, as of March 31, 2022, to a high of 94.2 percent, as of September 30, 2018.

A bank's NLTD ratio is compared to similarly-situated institutions. These institutions may operate within a bank's assessment area(s) and/or share similar attributes, such as size, branching network, and product offerings. Georgia Community Bank consistently maintained a reasonable NLTD ratio when comparing the average, current, high, and low ratios over the 25 calendar quarters. The following table shows the average NLTD ratio comparison data.

| Loan-to-Deposit (LTD) Ratio Comparison | | |
|---|---|--|
| Bank | Total Assets as of 12/31/2023 (\$000s) | Average Net LTD Ratio (%) |
| Georgia Community Bank, Dawson, GA | 379,322 | 74.1 |
| Bank of Alapaha, Alapaha, GA | 240,975 | 65.1 |
| Glennville Bank, Glennville, GA | 366,987 | 62.9 |
| First State Bank of Blakely, Blakely, GA | 597,183 | 85.6 |
| Flint Community Bank, Albany, GA | 307,262 | 96.2 |
| <i>Source: Call Reports 12/31/2017 – 12/31/2023</i> | | |

Assessment Area Concentration

Georgia Community Bank originated a majority of loans inside the assessment areas. Specifically, the majority of home mortgage and small business loans, by number and dollar volume, were originated within the assessment areas. Small farm loan originations were the same, by number, within and outside the assessment areas, and was slightly a majority, by dollar, within the

assessment areas. Overall, this performance demonstrates Georgia Community Bank's efforts to provide credit to individuals, businesses, and farms inside the assessment areas. The following table details the bank's lending concentration performance.

| Lending Inside and Outside of the Assessment Areas | | | | | | | | | | |
|---|-----------------|------|---------|------|------------|---------------------------------|------|---------|------|-------------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | | | | | | | | | | |
| 2021 | 286 | 80.8 | 68 | 19.2 | 354 | 23,190 | 71.8 | 9,105 | 28.2 | 32,295 |
| 2022 | 260 | 79.3 | 68 | 20.7 | 328 | 23,291 | 72.5 | 8,835 | 27.5 | 32,126 |
| Subtotal | 546 | 80.1 | 136 | 19.9 | 682 | 46,481 | 72.2 | 17,940 | 27.8 | 64,421 |
| Small Business | | | | | | | | | | |
| 2023 | 153 | 69.9 | 66 | 30.1 | 219 | 9,248 | 66.9 | 4,573 | 33.1 | 13,821 |
| Small Farm | | | | | | | | | | |
| 2023 | 26 | 50.0 | 26 | 50.0 | 52 | 2,493 | 50.0 | 2,490 | 50.0 | 4,983 |
| Total | 725 | 76.1 | 228 | 23.9 | 953 | 58,222 | 70.0 | 25,003 | 30.0 | 83,225 |
| Source: 2021-2022 HMDA LARs; 2023 Small Business and Small Farm Bank Data | | | | | | | | | | |

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Conclusions regarding Georgia Community Bank's performance are consistent throughout the assessment areas. The Macon MSA assessment area does not include low- or moderate-income geographies; therefore, the *Geographic Distribution* performance for this assessment area was not evaluated. Refer to the *Geographic Distribution* sections of the Albany MSA and Non-MSA assessment areas for further comment of the bank's lending performance.

Borrower Profile

Overall, the distribution of loans to borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes. Conclusions regarding Georgia Community Bank's performance are consistent throughout the assessment areas. Refer to the *Borrower Profile* sections of each assessment area for further comment of the bank's lending performance.

Response to Complaints

Georgia Community Bank has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Georgia Community Bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

ALBANY MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ALBANY MSA ASSESSMENT AREA

The Albany MSA assessment area continues to consist of Dougherty, Lee, and Terrell counties. These counties are part of the Albany, GA MSA, which also includes Worth County. Georgia Community Bank operates three, or 42.9 percent, of its branches in the Albany MSA assessment area. By dollar volume, the assessment area accounts for 74.2 percent of bank-wide loans and 50.4 percent of bank-wide deposits.

The previous evaluation used the 2010 U.S. Census to delineate the Albany MSA assessment area. Since the previous evaluation, the income-level classifications and number of census tracts in the assessment area changed as a result of the 2015 ACS Census data, and subsequently the 2020 U.S. Census data. The following table reflects changes in tract income-level and number of census tracts, based on the 2010 ACS Census and 2020 U.S. Census data.

| Tract Income Level | # of Census Tracts 2010 U.S. Census | # of Census Tracts 2020 U.S. Census |
|--|--|--|
| Low | 7 | 6 |
| Moderate | 8 | 8 |
| Middle | 7 | 15 |
| Upper | 14 | 11 |
| Income Not Assigned | - | 1 |
| Total | 36 | 41 |
| <i>Source: 2010 ACS Data and 2020 U.S. Census Data</i> | | |

Economic and Demographic Data

According to 2023 D&B data, there are 17,848 businesses and 819 farms operating in the assessment area. Of the businesses and farms, 90.1 percent and 97.0 percent, respectively, reported operating with gross annual revenues of \$1.0 million or less. Further, of the total 18,667 businesses and farms, 61.0 percent reported having four or fewer employees and 92.4 percent reported operating from a single location. The following table presents select demographic information from the 2020 U.S. Census and 2023 D&B data.

| Demographic Information of the Assessment Area | | | | | | |
|---|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 41 | 14.6 | 19.5 | 36.6 | 26.8 | 2.4 |
| Population by Geography | 128,138 | 11.4 | 16.5 | 34.2 | 33.5 | 4.4 |
| Housing Units by Geography | 56,081 | 11.0 | 18.4 | 34.5 | 31.3 | 4.8 |
| Owner-Occupied Units by Geography | 25,678 | 4.8 | 11.3 | 34.9 | 45.3 | 3.7 |
| Occupied Rental Units by Geography | 22,460 | 17.4 | 22.6 | 33.7 | 22.0 | 4.3 |
| Vacant Units by Geography | 7,943 | 13.0 | 29.6 | 35.7 | 12.3 | 9.4 |
| Businesses by Geography | 17,848 | 13.2 | 12.5 | 34.1 | 36.5 | 3.7 |
| Farms by Geography | 819 | 6.8 | 13.8 | 37.6 | 40.3 | 1.5 |
| Family Distribution by Income Level | 30,657 | 25.3 | 15.1 | 18.7 | 40.9 | 0.0 |
| Household Distribution by Income Level | 48,138 | 27.2 | 13.9 | 17.9 | 41.0 | 0.0 |
| Median Family Income MSA - 10500 Albany, GA MSA | | \$56,166 | Median Housing Value | | | \$112,136 |
| | | | Median Gross Rent | | | \$766 |
| | | | Families Below Poverty Level | | | 19.2% |
| Source: 2020 U.S. Census and 2023 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification. | | | | | | |

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 32.4 percent; followed by non-classifiable establishments at 25.5 percent; retail trade at 11.7 percent; and finance, insurance, and real estate at 9.4 percent.

According to the Georgia Department of Labor, major employers include (and in no particular order) Albany State University; The Procter & Gamble Paper Products; Phoebe Putney Memorial Hospital, Inc.; Georgia Department of Corrections; and Golden Peanut Company.

The FFIEC's estimated median family income levels for the Albany, GA MSA were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table.

| Median Family Income Ranges | | | | |
|-----------------------------|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes | Low <50% | Moderate 50% to <80% | Middle 80% to <120% | Upper ≥120% |
| 2021 (\$53,200) | <\$26,600 | \$26,600 to <\$42,560 | \$42,560 to <\$63,840 | ≥\$63,840 |
| 2022 (\$57,500) | <\$28,750 | \$28,750 to <\$46,000 | \$46,000 to <\$69,000 | ≥\$69,000 |
| Source: FFIEC | | | | |

The unemployment rate in Dougherty County decreased from 2021 to 2023, but remained above the state and national averages. The unemployment rate in Lee and Terrell counties decreased since 2021, and remained consistent in 2022 and 2023. Lee County's unemployment rate remained below the state and national averages. Terrell County's unemployment rate remained above the

state and national averages. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and the nation.

| Unemployment Rates | | | |
|---|------|------|------|
| Area | 2021 | 2022 | 2023 |
| | % | % | % |
| Dougherty | 6.3 | 4.3 | 4.4 |
| Lee | 3.1 | 2.9 | 2.9 |
| Terrell | 6.3 | 4.5 | 4.5 |
| State of Georgia | 3.9 | 3.0 | 3.3 |
| National Average | 5.3 | 3.6 | 3.6 |
| <i>Source: Bureau of Labor Statistics</i> | | | |

Competition

There is a high level of competition for deposits within the assessment area. According to the FDIC's June 30, 2023 *Deposit Market Share Report*, there are 13 FDIC-insured financial institutions operating 29 offices within the assessment area. Of these institutions, Georgia Community Bank ranked eighth, with a 6.1 percent deposit market share. The top five financial institutions accounted for 62.0 percent of the deposit market share.

There is a high level of competition for home mortgage loans within the assessment area. In 2022, aggregate data reflects 217 lenders reported 2,729 residential mortgage loans for \$538.0 million. Georgia Community Bank ranked third, with 6.7 percent of the total market share, by number of loans. The top five lenders (by number of home mortgage loans) accounted for 31.7 percent of the total market share.

As previously addressed, Georgia Community Bank is not required to collect or report small business or small farm loan data, and has elected not to do so. Therefore, the analysis of small business and small farm loans under the Lending Test does not include comparisons to aggregate data. However, aggregate data reflects the level of demand for small business and small farm loans and is, therefore, included for context. Aggregate data for small business and small farm loans is not available for calendar year 2023. As such, 2022 aggregate data was used. There is a high level of competition for small business loans and a moderate level of competition for small farm loans within the assessment area. For small business loans, 2022 aggregate data reflects 65 lenders reported 2,621 small business loans for \$99.2 million. The top five lenders (by number of small business loans) accounted for 54.7 percent of the total market share. For small farm loans, 2022 aggregate data reflects 12 lenders reported 45 small farm loans for \$3.2 million. The top five lenders (by number of small farm loans) accounted for 73.3 percent of the total market share.

Community Contact(s)

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

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

Examiners conducted one community contact with an organization that provides a variety of services and initiatives, including community service initiatives and improving housing conditions. The contact indicated that there are elevated poverty levels, limited job opportunities, and low wages in the assessment area. In addition, the cost of living has increased due to rising interest rates and inflation. As a result, there is difficulty for low- and moderate-income individuals and families to find affordable housing and meet essential needs. The contact indicated that affordable housing, improved job opportunities, and financial literacy programs are a need within the assessment area. The contact stated that local financial institutions have generally been responsive to the needs of the community, and that there are opportunities for further involvement with local, community-based organizations.

Credit Needs

Considering information obtained from the community contact, demographic data, and economic data, examiners determined that affordable housing and small business loans are primary credit needs and opportunities within the assessment area. Affordable housing is a need, as 19.2 percent of families are below the poverty level, 40.4 percent of families are low- and moderate-income, and as the need was identified by the community contact. In addition, small business loans are a need, as 90.1 percent of businesses reported operating with gross annual revenues of \$1.0 million or less.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALBANY MSA ASSESSMENT AREA

LENDING TEST

Georgia Community Bank demonstrated satisfactory performance under the Lending Test in the Albany MSA assessment area. The bank's overall reasonable geographic distribution and borrower profile performance supports this conclusion. Only loans originated within the assessment area were included in the analysis.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Excellent home mortgage and reasonable small business and small farm lending performance supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. Lending in low-income census tracts was above both demographics and aggregate lending performance. Lending in moderate-income census tracts was significantly above both demographics and aggregate lending performance. The following table reflects the distribution of home mortgage loans within the assessment area.

| Geographic Distribution of Home Mortgage Loans | | | | | | |
|--|-----------------------------------|------------------------------|------------|--------------|---------------|--------------|
| Tract Income Level | % of Owner-Occupied Housing Units | Aggregate Performance % of # | # | % | \$(000s) | % |
| Low | | | | | | |
| 2022 | 4.8 | 2.2 | 12 | 6.5 | 907 | 5.2 |
| Moderate | | | | | | |
| 2022 | 11.3 | 5.9 | 42 | 22.7 | 3,016 | 17.1 |
| Middle | | | | | | |
| 2022 | 34.9 | 35.3 | 65 | 35.1 | 6,332 | 36.0 |
| Upper | | | | | | |
| 2022 | 45.3 | 54.5 | 63 | 34.1 | 7,151 | 40.7 |
| Not Available | | | | | | |
| 2022 | 3.7 | 2.2 | 3 | 1.6 | 179 | 1.0 |
| Totals | | | | | | |
| 2022 | 100.0 | 100.0 | 185 | 100.0 | 17,585 | 100.0 |
| <i>Source: 2020 U.S. Census; 2022 HMDA LAR; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | |

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Lending in low-income census tracts was significantly below demographics; however, opportunity is limited, given the high level of competition from other financial institutions within this assessment area. Lending in moderate-income census tracts was significantly above than demographics. The following table reflects the distribution of small business loans within the assessment area.

| Geographic Distribution of Small Business Loans | | | | | |
|---|-----------------|------------|--------------|--------------|--------------|
| Tract Income Level | % of Businesses | # | % | \$(000s) | % |
| Low | 13.2 | 4 | 3.9 | 309 | 4.6 |
| Moderate | 12.5 | 33 | 32.4 | 2,638 | 38.9 |
| Middle | 34.1 | 24 | 23.5 | 1,353 | 19.9 |
| Upper | 36.5 | 41 | 40.2 | 2,486 | 36.6 |
| Not Available | 3.7 | 0 | 0.0 | 0 | 0.0 |
| Totals | 100.0 | 102 | 100.0 | 6,786 | 100.0 |
| <i>Source: 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. Although the bank did not originate any small farm loans in low-income census tracts, demographics reflect limited opportunities within these census tracts. Lending performance in moderate-income census tracts was significantly above demographics. The following table reflects the distribution of small farm loans within the assessment area.

| Geographic Distribution of Small Farm Loans | | | | | |
|---|--------------|-----------|--------------|--------------|--------------|
| Tract Income Level | % of Farms | # | % | \$(000s) | % |
| Low | 6.8 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 13.8 | 4 | 40.0 | 363 | 28.0 |
| Middle | 37.6 | 3 | 30.0 | 530 | 40.9 |
| Upper | 40.3 | 3 | 30.0 | 402 | 31.1 |
| Not Available | 1.5 | 0 | 0.0 | 0 | 0.0 |
| Totals | 100.0 | 10 | 100.0 | 1,295 | 100.0 |
| <i>Source: 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

Borrower Profile

The distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes. Reasonable home mortgage, small business, and small farm lending performance supports this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. Home mortgage lending to low-income borrowers was significantly below demographics, but above aggregate lending performance. Home mortgage lending to moderate-income borrowers was below demographics, but comparable to aggregate lending performance. The following table reflects the penetration of home mortgage loans, by borrower income level.

| Distribution of Home Mortgage Loans by Borrower Income Level | | | | | | |
|--|---------------|------------------------------|------------|--------------|---------------|--------------|
| Borrower Income Level | % of Families | Aggregate Performance % of # | # | % | \$(000s) | % |
| Low | | | | | | |
| 2022 | 25.3 | 2.9 | 8 | 4.3 | 296 | 1.7 |
| Moderate | | | | | | |
| 2022 | 15.1 | 10.1 | 17 | 9.2 | 875 | 5.0 |
| Middle | | | | | | |
| 2022 | 18.7 | 16.9 | 23 | 12.4 | 2,045 | 11.6 |
| Upper | | | | | | |
| 2022 | 40.9 | 44.0 | 81 | 43.8 | 8,984 | 51.1 |
| Not Available | | | | | | |
| 2022 | 0.0 | 26.0 | 56 | 30.3 | 5,385 | 30.6 |
| Totals | | | | | | |
| 2022 | 100.0 | 100.0 | 185 | 100.0 | 17,585 | 100.0 |
| <i>Source: 2020 U.S. Census; 2022 HMDA LAR; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | |

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Lending to businesses with gross annual revenues of \$1.0 million or less (small businesses) was slightly below, but comparable to, demographics. The following table reflects the penetration of small business loans, by businesses of different sizes.

| Distribution of Small Business Loans by Gross Annual Revenue Category | | | | | |
|---|-----------------|-----------|--------------|--------------|--------------|
| Gross Revenue Level | % of Businesses | # | % | \$(000s) | % |
| <=\$1,000,000 | 90.1 | 78 | 82.1 | 4,806 | 74.8 |
| >\$1,000,000 | 2.3 | 8 | 8.4 | 596 | 9.3 |
| Revenue Not Available | 7.7 | 9 | 9.5 | 1,025 | 16.0 |
| Total | 100.0 | 95 | 100.0 | 6,427 | 100.0 |
| <i>Source: 2023 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. Lending to farms with gross annual revenues of \$1.0 million or less (small farms) was below demographics. Although lending performance was below demographics, D&B data reflects the percentage of farms, by gross annual revenue, and not the level of demand for small farm loans. To gain a better understanding of credit needs and demand in the assessment area, examiners reviewed aggregate market data from institutions that collect and report data on small farm loans. The 2022

aggregate data reflects that 51.1 percent of all small farm loans were to small farms. The following table reflects the penetration of small farm loans, by farms of different sizes.

| Distribution of Small Farm Loans by Gross Annual Revenue Category | | | | | |
|---|-------------------|-----------|--------------|-----------------|--------------|
| Gross Revenue Level | % of Farms | # | % | \$(000s) | % |
| <=\$1,000,000 | 96.9 | 7 | 70.0 | 531 | 41.0 |
| >\$1,000,000 | 1.6 | 3 | 30.0 | 764 | 59.0 |
| Revenue Not Available | 1.5 | 0 | 0.0 | 0 | 0.0 |
| Total | 100.0 | 10 | 100.0 | 1,295 | 100.0 |
| <i>Source: 2023 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NON-MSA ASSESSMENT AREA

Georgia Community Bank added the Non-MSA assessment area, since the previous evaluation, due to merger activity. Georgia Community Bank’s merger with The Citizens State Bank of Taylor County, effective October 20, 2019, resulted in the bank adding Taylor County as a delineated, Non-MSA assessment area. Further, Georgia Community Bank’s merger with Commercial State Bank, effective December 9, 2019, resulted in the bank adding the Non-MSA counties of Seminole and Early. Therefore, the Non-MSA assessment area consists of Early, Seminole, and Taylor counties.

Georgia Community Bank operates three, or 42.9 percent, of its branches in the Non-MSA assessment area. By dollar volume, the assessment area accounts for 20.5 percent of bank-wide loans and 40.8 percent of bank-wide deposits.

Because Georgia Community Bank added the Non-MSA assessment area counties in October and December 2019, the delineated assessment area was based on the 2015 ACS Census data. The income-level classifications and number of census tracts in the assessment area changed as a result of the 2020 U.S. Census. The following table reflects the changes in tract income-level and number of census tracts, based on the 2015 ACS and 2020 U.S. Census data.

| Tract Income Level | # of Census Tracts 2015 ACS | # of Census Tracts 2020 U.S. Census |
|--|--|--|
| Low | - | 1 |
| Moderate | 3 | 6 |
| Middle | 8 | 5 |
| Upper | - | - |
| Income Not Assigned | - | - |
| Total | 11 | 12 |
| <i>Source: 2015 ACS Data and 2020 U.S. Census Data</i> | | |

The FFIEC has designated certain Non-MSA middle-income census tracts as distressed and/or underserved. The distressed designation is based on high unemployment rates, poverty rates, and/or population loss. The underserved designation is based on areas being rural and remote. Since the bank's addition of the Non-MSA assessment area in 2019, all middle-income census tracts have been distressed and/or underserved. In 2023 specifically, the five middle-income census tracts received the following designations:

- One distressed due to high poverty rates and population loss (Early County);
- Two distressed due to high poverty rates (Seminole County); and
- Two distressed due to high poverty rates and underserved (Taylor County)

Economic and Demographic Data

According to 2023 D&B data, there are 2,765 businesses and 375 farms operating in the assessment area. Of the businesses and farms, 88.6 percent and 95.5 percent, respectively, reported operating with gross annual revenues of \$1.0 million or less. Further, of the total 3,140 businesses and farms, 65.7 percent reported having four or fewer employees and 91.6 percent reported operating from a single location. The following table presents select demographic information from the 2020 U.S. Census and 2023 D&B data.

| Demographic Information of the Assessment Area | | | | | | |
|---|--------|---------------|------------------------------|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 12 | 8.3 | 50.0 | 41.7 | 0.0 | 0.0 |
| Population by Geography | 27,817 | 6.8 | 47.5 | 45.7 | 0.0 | 0.0 |
| Housing Units by Geography | 14,447 | 8.7 | 43.4 | 47.9 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 7,231 | 6.4 | 41.6 | 52.0 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 3,952 | 14.1 | 58.2 | 27.7 | 0.0 | 0.0 |
| Vacant Units by Geography | 3,264 | 7.3 | 29.6 | 63.2 | 0.0 | 0.0 |
| Businesses by Geography | 2,765 | 6.2 | 56.9 | 36.9 | 0.0 | 0.0 |
| Farms by Geography | 375 | 6.4 | 48.0 | 45.6 | 0.0 | 0.0 |
| Family Distribution by Income Level | 7,235 | 36.7 | 17.8 | 14.4 | 31.1 | 0.0 |
| Household Distribution by Income Level | 11,183 | 34.8 | 17.4 | 16.2 | 31.6 | 0.0 |
| Median Family Income Non-MSAs - GA | | \$55,969 | Median Housing Value | | | \$101,922 |
| | | | Median Gross Rent | | | \$679 |
| | | | Families Below Poverty Level | | | 27.3% |
| Source: 2020 U.S. Census and 2023 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification. | | | | | | |

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 26.9 percent; followed by non-classifiable establishments at 21.4 percent; retail trade at 12.6 percent; and agriculture, forestry, and fishing at 11.9 percent.

According to the Georgia Department of Labor, major employers include (and in no particular order) Birdsong Peanuts; Golden Peanut Company; American Peanut Growers Group, LLC; Donalsonville Hospital, Inc.; and Blattner Energy, Inc.

The FFIEC’s estimated median family income levels for the Non-MSA were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table.

| Median Family Income Ranges | | | | |
|-----------------------------|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes | Low <50% | Moderate 50% to <80% | Middle 80% to <120% | Upper ≥120% |
| 2021 (\$53,400) | <\$26,700 | \$26,700 to <\$42,720 | \$42,720 to <\$64,080 | ≥\$64,080 |
| 2022 (\$64,100) | <\$32,050 | \$32,050 to <\$51,280 | \$51,280 to <\$76,920 | ≥\$76,920 |
| Source: FFIEC | | | | |

Early County’s unemployment rate decreased since 2021, and remained consistent in 2022 and 2023. Early County’s unemployment rate remained above state averages, and was comparable to national averages. Taylor County’s unemployment rate decreased from 2021 to 2023, and remained above state and national averages. Seminole County’s unemployment rate decreased from 2021 to 2022, and increased from 2022 to 2023. The following table reflects the average annual unemployment rates and trends for the assessment area counties, state, and the nation.

| Unemployment Rates | | | |
|------------------------------------|------|------|------|
| Area | 2021 | 2022 | 2023 |
| | % | % | % |
| Early | 5.0 | 3.6 | 3.6 |
| Seminole | 3.7 | 3.5 | 3.9 |
| Taylor | 6.0 | 5.0 | 4.5 |
| State of Georgia | 3.9 | 3.0 | 3.3 |
| National Average | 5.3 | 3.6 | 3.6 |
| Source: Bureau of Labor Statistics | | | |

Competition

There is a moderate level of competition for deposits within the assessment area. According to the FDIC’s June 30, 2023 *Deposit Market Share Report*, there are seven FDIC-insured financial institutions operating 11 offices within the assessment area. Of these institutions, Georgia Community Bank ranked second, with a 22.2 percent deposit market share. The top five financial institutions accounted for 91.4 percent of the deposit market share.

There is a high level of competition for home mortgage loans within the assessment area. In 2022, aggregate data reflects 101 lenders reported 471 residential mortgage loans for \$67.0 million. Georgia Community Bank is not required to report the location of its lending in the Non-MSA assessment area, and has elected not to do so. Therefore, Georgia Community Bank’s total market

share ranking, when compared to aggregate data, is not available. The top five lenders (by number of home mortgage loans) accounted for 44.2 percent of the total market share.

There is a high level of competition for small business loans and a moderate level of competition for small farm loans within the assessment area. For small business loans, 2022 aggregate data reflects 44 lenders reported 447 small business loans for \$11.6 million. The top five lenders (by number of small business loans) accounted for 57.5 percent of the total market share. For small farm loans, 2022 aggregate data reflects 11 lenders reported 46 small farm loans for \$2.7 million. The top five lenders (by number of small farm loans) accounted for 84.8 percent of the total market share.

Credit Needs

Considering demographic and economic data, examiners determined that small business loans are a primary credit need and opportunity within the assessment area. The significant percentage of businesses with gross annual revenues of \$1.0 million or less (88.6 percent) support the conclusion that there is a need for small business lending. Also, all of the census tracts in this assessment area categorized as either low-, moderate-, or distressed/underserved middle-income; therefore, there is a need for revitalization and stabilization, which further supports the need for small business lending. In addition, affordable housing is a need, as 27.3 percent of families are below the poverty level and 54.5 percent of families are low- and moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NON-MSA ASSESSMENT AREA

LENDING TEST

Georgia Community Bank demonstrated satisfactory performance under the Lending Test in the Non-MSA assessment area. The bank's overall reasonable geographic distribution and borrower profile performance supports this conclusion. Only loans originated within the assessment area were included in the analysis.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Reasonable home mortgage, small business, and small farm lending performance supports this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Lending in the low-income census tract was below demographics, but comparable to aggregate lending performance. Lending in moderate-income census tracts was above both demographics and aggregate lending performance. The following table reflects the distribution of home mortgage loans within the assessment area.

| Geographic Distribution of Home Mortgage Loans | | | | | | |
|--|-----------------------------------|------------------------------|-----------|--------------|--------------|--------------|
| Tract Income Level | % of Owner-Occupied Housing Units | Aggregate Performance % of # | # | % | \$(000s) | % |
| Low | | | | | | |
| 2022 | 6.4 | 5.5 | 2 | 3.2 | 59 | 1.7 |
| Moderate | | | | | | |
| 2022 | 41.6 | 40.3 | 32 | 51.6 | 1,651 | 47.3 |
| Middle | | | | | | |
| 2022 | 52.0 | 54.1 | 28 | 45.2 | 1,783 | 51.0 |
| Totals | | | | | | |
| 2022 | 100.0 | 100.0 | 62 | 100.0 | 3,493 | 100.0 |
| <i>Source: 2020 U.S. Census; 2022 HMDA LAR; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | |

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Lending in the low- and moderate-income census tracts was below, but comparable to, demographics. Further, there is high competition of other financial institutions within the assessment area, which impacts lending opportunities. The following table reflects the distribution of small business loans within the assessment area.

| Geographic Distribution of Small Business Loans | | | | | |
|---|-----------------|-----------|--------------|--------------|--------------|
| Tract Income Level | % of Businesses | # | % | \$(000s) | % |
| Low | 6.2 | 1 | 2.3 | 19 | 0.9 |
| Moderate | 56.9 | 21 | 47.7 | 823 | 36.6 |
| Middle | 36.9 | 22 | 50.0 | 1,404 | 62.5 |
| Totals | 100.0 | 44 | 100.0 | 2,246 | 100.0 |
| <i>Source: 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. The bank did not originate any small farm loans in the low-income census tract; however, the relatively low percentage of small farms operating within the one low-income census tract indicates limited opportunity and demand for small farm loans. Lending in moderate-income census tracts was below, but comparable to, demographics. The following table reflects the distribution of small farm loans within the assessment area.

| Geographic Distribution of Small Farm Loans | | | | | |
|---|--------------|-----------|--------------|--------------|--------------|
| Tract Income Level | % of Farms | # | % | \$(000s) | % |
| Low | 6.4 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 48.0 | 6 | 40.0 | 324 | 27.5 |
| Middle | 45.6 | 9 | 60.0 | 854 | 72.5 |
| Totals | 100.0 | 15 | 100.0 | 1,177 | 100.0 |
| <i>Source: 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i> | | | | | |

Borrower Profile

The distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes. Reasonable home mortgage, small business, and small farm lending performance supports this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. Home mortgage lending to low-income borrowers was significantly below demographics, but significantly above aggregate lending performance. Home mortgage lending to moderate-income borrowers was above both demographics and aggregate lending performance. The following table reflects the penetration of home mortgage loans, by borrower income level.

| Distribution of Home Mortgage Loans by Borrower Income Level | | | | | | |
|--|---------------|---------------------------------|-----------|--------------|--------------|--------------|
| Borrower Income Level | % of Families | Aggregate Performance % of # | # | % | \$(000s) | % |
| Low | | | | | | |
| 2022 | 36.7 | 6.2 | 12 | 19.4 | 328 | 9.4 |
| Moderate | | | | | | |
| 2022 | 17.8 | 17.0 | 14 | 22.6 | 543 | 15.5 |
| Middle | | | | | | |
| 2022 | 14.4 | 19.3 | 16 | 25.8 | 870 | 24.9 |
| Upper | | | | | | |
| 2022 | 31.1 | 35.0 | 18 | 29.0 | 1,564 | 44.8 |
| Not Available | | | | | | |
| 2022 | 0.0 | 22.5 | 2 | 3.2 | 188 | 5.4 |
| Totals | | | | | | |
| 2022 | 100.0 | 100.0 | 62 | 100.0 | 3,493 | 100.0 |
| <i>Source: 2020 U.S. Census; 2022 HMDA LAR; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%</i> | | | | | | |

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Lending to businesses with gross annual revenues of \$1.0 million or less (small businesses) was below demographics but is reasonable. It is noted that revenue was not available for nearly 27 percent of businesses. The following table reflects the penetration of small business loans, by businesses of different sizes.

| Distribution of Small Business Loans by Gross Annual Revenue Category | | | | | |
|--|-----------------|-----------|--------------|--------------|--------------|
| Gross Revenue Level | % of Businesses | # | % | \$(000s) | % |
| <=\$1,000,000 | 88.6 | 30 | 73.2 | 1,283 | 57.6 |
| >\$1,000,000 | 2.0 | 0 | 0.0 | 0 | 0.0 |
| Revenue Not Available | 9.4 | 11 | 26.8 | 943 | 42.4 |
| Total | 100.0 | 41 | 100.0 | 2,226 | 100.0 |
| Source: 2023 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0% | | | | | |

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. Lending to farms with gross annual revenues of \$1.0 million or less (small farms) was slightly below, but comparable to, demographics. The following table reflects the penetration of small farm loans, by farms of different sizes.

| Distribution of Small Farm Loans by Gross Annual Revenue Category | | | | | |
|--|--------------|-----------|--------------|--------------|--------------|
| Gross Revenue Level | % of Farms | # | % | \$(000s) | % |
| <=\$1,000,000 | 95.5 | 13 | 86.7 | 1,119 | 95.0 |
| >\$1,000,000 | 2.7 | 0 | 0.0 | 0 | 0.0 |
| Revenue Not Available | 1.9 | 2 | 13.3 | 59 | 5.0 |
| Total | 100.0 | 15 | 100.0 | 1,178 | 100.0 |
| Source: 2023 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0% | | | | | |

MACON MSA ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN MACON MSA ASSESSMENT AREA

Georgia Community Bank added the Macon MSA assessment area, since the previous evaluation, due to merger activity. Georgia Community Bank’s merger with The Citizens State Bank of Taylor County, effective October 20, 2019, resulted in the bank adding Crawford County as a delineated assessment area. Crawford County is part of the Macon-Bibb County, GA MSA, which also includes Bibb, Jones, Monroe, and Twiggs counties.

Georgia Community Bank operates one, or 14.2 percent, of its branches in the Macon MSA assessment area. By dollar volume, the assessment area accounts for 5.3 percent of bank-wide loans and 8.8 percent of bank-wide deposits.

Because Georgia Community Bank added the Macon MSA assessment area in October 2019, the delineated assessment area was based on the 2015 ACS Census data. The release of the 2020 U.S. Census data impacted the number and income-level classifications of census tracts nationwide. However, Crawford County's census tract number and income-classifications were not changed. The 2015 ACS Census and 2020 U.S. Census reflect three middle-income census tracts for this assessment area.

Economic and Demographic Data

According to 2023 D&B data, there are 917 businesses and 95 farms operating in the assessment area. Of the businesses and farms, 93.8 percent and 99.0 percent, respectively, reported operating with gross annual revenues of \$1.0 million or less. Further, of the total 1,012 businesses and farms, 68.6 percent reported having four or fewer employees and 95.9 percent reported operating from a single location. The following table presents select demographic information from the 2020 U.S. Census and 2023 D&B data.

| Demographic Information of the Assessment Area | | | | | | |
|---|--------|---------------|------------------------------|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 3 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Population by Geography | 12,130 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Housing Units by Geography | 5,379 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 3,540 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 1,033 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Vacant Units by Geography | 806 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Businesses by Geography | 917 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Farms by Geography | 95 | 0.0 | 0.0 | 100.0 | 0.0 | 0.0 |
| Family Distribution by Income Level | 3,259 | 24.8 | 21.0 | 18.0 | 36.2 | 0.0 |
| Household Distribution by Income Level | 4,573 | 25.6 | 9.4 | 20.0 | 44.9 | 0.0 |
| Median Family Income MSA - 31420 Macon-Bibb County, GA MSA | | \$62,540 | Median Housing Value | | | \$122,191 |
| | | | Median Gross Rent | | | \$655 |
| | | | Families Below Poverty Level | | | 13.8% |
| Source: 2020 U.S. Census and 2023 D&B Data; Due to rounding, totals may not equal 100.0%; (*) The NA category consists of geographies that have not been assigned an income classification. | | | | | | |

According to the Standard Industrial Classification System, the services industry represents the largest percentage of businesses at 25.6 percent; followed by non-classifiable establishments at 22.4

percent; construction at 11.1 percent; and retail trade at 10.9 percent. According to the Georgia Department of Labor, major employers include (and in no particular order) Pearson Farm; Atlanta Sand & Supply Co; Dickey Farms, Inc.; Naes Corporation; and Cleveland Tree Co.

The following table presents the FFIEC's estimated median family income levels for the Macon-Bibb County, GA MSA.

| Median Family Income Ranges | | | | |
|-----------------------------|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes | Low <50% | Moderate 50% to <80% | Middle 80% to <120% | Upper ≥120% |
| 2021 (\$58,300) | <\$29,150 | \$29,150 to <\$46,640 | \$46,640 to <\$69,960 | ≥\$69,960 |
| 2022 (\$70,100) | <\$35,050 | \$35,050 to <\$56,080 | \$56,080 to <\$84,120 | ≥\$84,120 |
| Source: FFIEC | | | | |

The following table reflects the annual unemployment rates and trends for the assessment area, state, and the nation.

| Unemployment Rates | | | |
|------------------------------------|------|------|------|
| Area | 2021 | 2022 | 2023 |
| | % | % | % |
| Crawford | 3.8 | 3.1 | 3.3 |
| State of Georgia | 3.9 | 3.0 | 3.3 |
| National Average | 5.3 | 3.6 | 3.6 |
| Source: Bureau of Labor Statistics | | | |

According to the FDIC's June 30, 2023 *Deposit Market Share Report*, Georgia Community Bank is the only FDIC-insured financial institution with an office within the assessment area, thereby accounting for 100.0 percent of the deposit market share.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MACON MSA ASSESSMENT AREA

LENDING TEST

The institution's lending performance in the Macon MSA assessment area is consistent with the lending performance in the assessment areas within the Albany MSA and Non-MSA portion of the state that were reviewed using full-scope examination procedures.

Geographic Distribution

The assessment area does not include any low- or moderate-income geographies. Therefore, this performance criterion was not evaluated.

Borrower Profile

The distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income). Reasonable home mortgage lending performance supports this conclusion. Meaningful conclusions for small business and small farm lending performance could not be formed.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. Home mortgage lending to low-income borrowers (23.1 percent) was comparable to demographics (24.8 percent), and significantly above aggregate lending performance (7.0 percent). Home mortgage lending to moderate-income borrowers (15.4 percent) was below demographics (21.0 percent) and aggregate lending performance (20.9 percent).

Small Business Loans

During the review period, Georgia Community Bank originated seven small business loans totaling approximately \$216,000 in the assessment area. One loan (14.3 percent) was originated to a business with gross annual revenues of \$1.0 million or less (small business); one loan (14.3 percent) was originated to a business with gross annual revenues greater than \$1.0 million; and five loans (71.4 percent) were originated to businesses with revenues not available. Given the low volume of small business loans in this assessment area, meaningful conclusions could not be formed.

Small Farm Loans

During the review period, Georgia Community Bank originated one small farm loan totaling approximately \$21,000 in the assessment area. The one small farm loan was originated to a farm with gross annual revenues not available. Given the low volume of small farm loans in this assessment area, meaningful conclusions could not be formed.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the institution under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

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

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.