

CRA PUBLIC FILE

CRA Performance Evaluation

The following is the public section of the bank's most recent CRA performance evaluation prepared by the FDIC.

NOTE: The Bank of Soperton changed its name to Georgia First Bank, effective May 2, 2022.

PUBLIC DISCLOSURE

June 28, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bank of Soperton Certificate Number: 889

1202 Second Street North Soperton, Georgia 30457

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

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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.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated <u>Satisfactory.</u> 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 Lending Test is rated **Satisfactory**.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area's credit needs.
- The bank originated a majority of its loans within the assessment area.
- The geographic distribution of the loans reflects a reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects a poor penetration among businesses and farms of different sizes and individuals of different income levels.
- The institution has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

The Bank of Soperton (TBOS) is headquartered in Soperton, Georgia, and is a wholly owned subsidiary of Soperton Bancshares, Inc., a one-bank holding company. The bank received a Satisfactory rating at the previous FDIC CRA Performance Evaluation, dated May 11, 2015, based on Interagency Small Institution Examination Procedures.

TBOS operates two full-service offices. The bank's main office is located in Soperton, Treutlen County, Georgia, in a distressed middle-income census tract. On March 16, 2017, the bank converted its loan production office into a full-service branch located in Vidalia, Toombs County, Georgia. The branch operates under a different local name, Million Pines Community Bank, as a division of the bank; it's located in an upper-income census tract. Lobby hours are reasonable at both locations, with the main office operating until noon on Wednesday and drive-thru hours until noon on Saturday. The bank has not closed any offices, and no mergers or acquisition activities have occurred since the previous evaluation.

The institution offers a variety of products and services to meet the needs of its communities. Deposit products offered include checking, savings, money market, certificates of deposit, and individual retirement accounts. Alternative banking services include internet, mobile, telephone banking, and automated teller machines (ATM) through the Sum ATM Network. The institution also operates a deposit-taking ATM at its main office with an additional stand-alone, deposit-taking ATM located in Glenwood, Wheeler County, Georgia.

Lending products offered include commercial real estate loans, home mortgage loans, equity lines of credit, farmland loans, construction and development loans, working capital loans, land loans, agricultural loans, letters of credit, vehicle loans, and personal loans. TBOS does not offer long-term home mortgage loans due to interest risk considerations. Since the previous evaluation, TBOS

began brokering long-term home loans to residential investors on the secondary market to help its community. The bank has brokered 12 loans totaling \$2.8 million since the previous evaluation. Additionally, the bank is set up to offer loans through the U.S. Small Business Administration (SBA), such as the 7(a) loan programs, which includes the 7(a) Paycheck Protection Program (PPP). In 2021, TBOS originated four SBA PPP loans totaling \$93,863. The SBA guarantees PPP loans under the Coronavirus Aid, Relief, and Economic Security Act, commonly known as the CARES Act. The loans serve to retain jobs that would otherwise be lost due to business closures because of the COVID-19 emergency. Further, in response to the COVID-19 emergency, TBOS supported its community by providing 89 credit extensions for 72 borrowers.

As of the March 31, 2021 Consolidated Reports of Condition and Income (Call Report), TBOS had total assets of \$114.9 million, with loans totaling \$92.7 million, or 80.7 percent of total assets. Since the previous evaluation, the institution's total loans increased annually by 38.2 percent. As shown in the following table, business loans (loans secured by non-farm, non-residential properties and commercial and industrial loans) represented the largest portion of the loan portfolio at 35.4 percent. The next largest portions of the loan portfolio were home mortgage loans (one-to-four residential property loans) and farm loans (farmland and agricultural loans) at 31.5 percent and 14.3 percent, respectively.

Loan Portfolio Distribution as of 3/31/2021						
Loan Category	\$(000s)	%				
Construction, Land Development, and Other Land Loans	8,544	9.2				
Secured by Farmland	11,563	12.5				
Secured by 1-4 Family Residential Properties	29,222	31.5				
Secured by Multi-family (5 or more) Residential Properties	738	0.8				
Secured by Non-farm Non-Residential Properties	14,372	15.5				
Total Real Estate Loans	64,439	69.5				
Commercial and Industrial Loans	18,413	19.9				
Agricultural Production and Other Loans to Farmers	1,677	1.8				
Consumer	8,112	8.7				
Obligations of States and Political Subdivisions in the United States	0	0.0				
Other Loans	98	0.1				
Lease Financing Receivables (net of unearned income)	0	0.0				
Less: Unearned Income	(14)	(<0.0)				
Total Loans	92,725	100.0				
Source: Call Report	<u>.</u>					

Examiners did not identify any financial or legal impediments that affect the bank's ability to meet the assessment areas' credit needs. However, demographic information may have impacted the bank's lending. In particular, the assessment area has a high percentage of families living below the poverty level and some census tracts are designated as distressed due to high levels of poverty.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires financial institutions to define assessment area(s) in which its CRA performance will be evaluated.

TBOS continues to maintain one assessment area, which includes all census tracts within Emanuel, Laurens, Montgomery, Toombs, Treutlen, and Wheeler Counties, Georgia, no change since the previous evaluation. These counties are located in the non-metropolitan statistical areas of Georgia (GA Non-MSA AA). The bank has defined the assessment area in accordance with the technical requirements of the CRA regulation.

Economic and Demographic Data

According to the 2015 American Community Survey (ACS) Census data, the GA Non-MSA AA consists of 32 census tracts of which 2 are low-, 5 are moderate-, 19 are middle-, and 6 are upper-income. All 19 middle-income census tracts are designated as distressed due to high levels of poverty. Additionally, the assessment area included designated disaster areas due to Hurricane Irma in 2017 (September 7, 2017 - September 20, 2017) and Hurricane Michael in 2018 (October 9, 2018 - October 23, 2018). The table below details demographic characteristics of the assessment area based on the 2015 ACS data and the 2020 D&B data.

Demographic Infor	Demographic Information of the Hillsborough County Assessment Area									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	32	6.3	15.6	59.4	18.8	0.0				
Population by Geography	121,513	3.6	20.6	59.4	16.4	0.0				
Housing Units by Geography	53,041	3.8	19.2	60.8	16.1	0.0				
Owner-Occupied Units by Geography	28,600	1.7	16.7	62.1	19.5	0.0				
Occupied Rental Units by Geography	15,656	6.6	22.5	58.4	12.5	0.0				
Vacant Units by Geography	8,785	5.9	21.9	60.5	11.7	0.0				
Businesses by Geography	8,718	5.6	17.2	58.9	18.3	0.0				
Farms by Geography	557	2.2	18.0	63.7	16.2	0.0				
Family Distribution by Income Level	29,647	25.5	17.4	17.8	39.3	0.0				
Household Distribution by Income	44,256	29.6	16.2	15.1	39.1	0.0				
Median Family Income Non-MSAs - GA	A	\$45,886	Median Housing Value			\$78,999				
			Median Gro	ss Rent		\$564				
			Families Be	low Poverty	Level	20.9%				

Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0 percent. *The NA category consists of geographies (census tracts) that have not been assigned an income classification.

According to 2020 D&B data, there were 8,718 businesses in the assessment area. The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue (GAR) level. The following reflects GARs for these businesses: 83.5 percent had \$1.0 million or less, 4.4 percent had more than \$1.0 million, and 12.1 percent had unknown revenues. According to 2020 D&B data, there were 557 farms in the assessment area. The analysis of small farms loans under the Borrower Profile criterion compares the distribution of farms by GAR level. The following reflects GARs for these businesses: 95.5 percent had \$1.0 million or less, 2.7 percent had more than \$1.0 million, and 1.8 percent had unknown revenues.

The largest sectors of businesses in the assessment area are government, retail trade, manufacturing, and healthcare and social assistance. Major employers in the assessment area include Best Buy Stores, LP; Brewton Parker College; Crider, Inc.; Fairview Park Hospital; Flexsteel Industries, Inc.; Meadows Regional Medical Center, Inc.; Trane U.S., Inc.; Treutlen County Health and Rehabilitation; Walmart; Wheeler Correctional Facility; and YKK AP America, Inc.

Data obtained from the U.S. Bureau of Labor Statistics indicates the unemployment rate changed during the evaluation period. As illustrated in the table below, the annual unemployment rate in the U.S., Georgia and the assessment area decreased until 2020. In 2020, the U.S., Georgia, and the assessment area increased with the exception of Wheeler County, which has generally been higher in its unemployment rate than the rest of these areas. The assessment area unemployment rates have been higher each year than the national and state unemployment rates until 2020. In 2020, the U.S. unemployment rate was higher than the assessment area and the Georgia unemployment rate was higher than Montgomery and Treutlen Counties.

Unemployment Rates							
Aura	2017	2018	2019	2020			
Area	%	%	%	%			
Emanuel County	6.8	6.0	5.4	7.1			
Laurens County	5.9	4.9	4.6	6.7			
Montgomery County	6.7	5.8	5.2	5.4			
Toombs County	6.6	5.9	5.0	6.6			
Treutlen County	6.8	5.9	5.3	6.0			
Wheeler County	9.1	7.5	7.4	7.2			
State of Georgia	4.8	4.0	3.5	6.5			
National Average	4.4	3.9	3.7	8.1			
Source: Bureau of Labor Statistics	4.4	3.7] 3./	0.1			

Examiners used the Federal Financial Institutions Examination Council (FFIEC)-updated median family income (MFI) figures to analyze home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income MFI categories in the Non-MSA portions of Georgia. As shown, in 2020, the maximum MFI for low-income families was \$25,900, which is low, when considering the median housing value of \$78,999 in the assessment area. Further, 20.9 percent of families in the assessment area have incomes below the federal poverty level. These families will likely face difficulty in qualifying for conventional home mortgage loans.

Median Family Income Ranges – GA Non-MSA (99999)								
Median Family Low Moderate Middle Upper								
Incomes	<50%	50% to <80%	80% to <120%	≥120%				
2020 (\$51,800)	<\$25,900	\$25,900 to <\$41,440	\$41,440 to <\$62,160	≥\$62,160				
Source: FFIEC								

Competition

TBOS operates in a competitive environment. In addition to competing with large national and regional banks, the bank also competes with local community banks, credit unions, and finance companies. Internet banking further increases the level of competition. According to the FDIC

Deposit Market Share data, as of June 30, 2020, 20 financial institutions operated 43 offices within the assessment area. Of these institutions, TBOS ranked 12th, with a 3.7 percent market share.

Community Contact

Examiners rely on contacts with community organizations to gain insight regarding the credit needs and economic conditions of a bank's assessment area(s). Individuals interviewed provide information based upon their knowledge and expertise in the housing, business, or economic sectors. During this evaluation, examiners conducted a contact with an organization in the assessment area. This contact noted the primary needs are flexible credit products, such as working capital loans or lines of credit, that helps keep money flowing. Also, the contact stated promoting local industry via specialized financial products and knowledge and assistance in launching entrepreneurial ventures are needed. The contact noted that the perception of area financial institutions is generally favorable. The contact added financial institutions are vital in helping a community thrive and added that local-owned banks seemed to be more flexible, approachable and community-oriented in helping the community.

Credit Needs

Based on demographic information and economic data, examiners identified certain credit and needs and opportunities within the assessment area. The relatively high number of low- and moderate-income families in comparison to home prices, indicates a strong need for affordable housing. Second, based on information received from a community contact, flexible credit products and financial counseling are needed in the community. Third, small business and small farm loans are needed, as there are a significant percentage of businesses and farms with GARs of \$1.0 million or less and a large number of businesses and farms with 4 or fewer employees at 61.3 percent.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated May 11, 2015, to the current evaluation. Examiners used the Interagency Small Institution Examination Procedures to evaluate the bank's CRA performance. As described in the Appendices these procedures include the Lending Test.

Activities Reviewed

The CRA regulation requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. TBOS's major product line is business loans and one-to-four family home mortgage loans followed by farm loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated or purchased during the evaluation period. As a result, small business, home mortgage, and small farm loans were reviewed.

Examiners collected small business data from bank records for loans originated in 2020 to draw conclusions about the bank's performance. Based on bank records, the bank originated 337 small business loans totaling \$33.3 million in 2020. A sample of 58 small business loans totaling \$6.8 million was used to evaluate the bank's lending performance. The volume of small business loan originations in 2020 was reflective of the bank's lending during the evaluation period. As a CRA non-reporter, aggregate small business lending data is not used for comparison purposes; therefore, examiners compared the bank's 2020 small business lending performance to 2020 D&B data.

The Home Mortgage Disclosure Act (HMDA) requires banks meeting asset size and certain location requirements, to report home mortgage loan data. However, TBOS is not subject to the requirements of the HMDA. Based on bank records, in 2020, the bank originated 145 home mortgage loans totaling \$18.7 million. A sample of 47 home mortgage loans totaling \$7.3 million was used to evaluate the bank's lending performance. As a HMDA non-reporter, aggregate home mortgage lending data is not used for comparison purposes; therefore, examiners compared the bank's 2020 home mortgage lending performance to applicable demographic data based on the 2015 ACS data.

Examiners collected small farm data from bank records for loans originated in 2020 to draw conclusions about the bank's performance. Based on bank records, the bank originated 82 small farm loans totaling \$9.0 million in 2020. A sample of 41 small farm loans totaling \$3.2 million was used to evaluate the bank's lending performance. As a CRA non-reporter, aggregate small farm lending data is not used for comparison purposes; therefore, examiners compared the bank's 2020 small farm lending performance to 2020 D&B data.

The bank's primary commercial and home mortgage loan concentration and focus increased considerably since the previous evaluation. Therefore, greater weight was given to the small business and home mortgage loans when determining the conclusions and overall ratings reflected in this evaluation.

Examiners reviewed the number and dollar volume of a bank's small business, home mortgage and small farm loans. The tables in the evaluation present both the number and dollar volume of loans. However, examiners emphasize performance by number of loans, as the number of loans is a better indicator of the number of individuals, businesses, and farms served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

TBOS demonstrated satisfactory performance under the Lending Test. The bank's performance in its assessment area, relative to the loan-to-deposit ratio, assessment area concentration, and geographic distribution, support this conclusion.

Loan-to-Deposit Ratio (LTD)

The bank's average net LTD ratio is more than reasonable given the institution's size, financial condition, and assessment area's credit needs. The bank's net LTD ratio, calculated from Call Report data, averaged 85.1 percent over the past 24 calendar quarters from June 30, 2015, to March 31, 2021. This ratio is calculated on a net basis, excluding the loan loss reserves and unearned income.

During the evaluation period, the ratio fluctuated with no distinctive trend, ranging from a high of 90.7 percent as of December 31, 2018, to a low of 76.8 percent as of June 30, 2015. Since the previous evaluation, the bank experienced an increase in net loan volume of \$63.5 million, representing a 228.9 percent increase since June 30, 2015. Similarly, the bank experienced an increase in total deposits of \$67.9 million, representing a 188.0 percent increase since June 30, 2015.

The following table presents the average LTD ratio for TBOS as well as for comparable institutions based on asset size, geographic location, and lending focus. As shown in the following table, TBOS maintained an average LTD ratio that was higher than and consistent with the comparable banks.

LTD Ratio Comparison							
Bank	Total Assets as of 3/31/2021 \$(000s)	Average Net LTD Ratio (%)					
The Bank of Soperton, Soperton, Georgia	114,913	85.1					
Wheeler County State Bank, Alamo, Georgia	117,887	76.5					
Peoples Bank, Lyons, Georgia	144,050	79.9					
Farmers State Bank, Dublin, Georgia	146,185	81.7					
Altamaha Bank & Trust, Vidalia, Georgia	234,603	74.3					
Source: Call Reports 6/30/2015 - 3/31/2021							

Assessment Area Concentration

A majority of the loans reviewed were originated in the bank's assessment area, by number and by dollar amount. As shown in the following table, TBOS extended 74.1 percent, 83.0 percent, and 82.9 percent of the small business, home mortgage, and farm loans, respectively, by number, inside the assessment area. This performance demonstrates the bank's efforts to provide credit to businesses, individuals, and farms inside the assessment area.

T	ľ	Number	of Loa	ns	T.4-1	Dollar	Amount o	of Loans \$(000s)	T-4-1
Loan	Ins	side	Out	tside	Total	Insi	de	Out	side	Total
Category	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business							•			
2020	43	74.1	15	25.9	58	4,244	62.8	2,513	37.2	6,757
Home Mortgage							•			
2020	39	83.0	8	17.0	47	4,587	62.9	2,704	37.1	7,291
Small Farm										
2020	34	82.9	7	17.1	41	2,524	78.5	695	21.5	3,219
2020 Source: 2020 Bank		0-17	/	1/.1	41	2,324	/8.5	093	21.5	3,219

Geographic Distribution

The geographic distribution of the loans reflects a reasonable dispersion in the assessment area. This conclusion is based on a reasonable dispersion of the small business, home mortgage, and small farm loans.

Small Business Loans

The geographic distribution of the small business loans reflects a reasonable dispersion in the assessment area. As illustrated in the following table, the bank did not originate any loans in low-income census tracts. However, there are a limited number of businesses in these tracts. TBOS's level of lending in moderate-income census tracts was above demographic data.

Geographic Distribution of Small Business Loans								
Tract Income Level	% of Businesses	#	%	\$(000s)	%			
Low	5.6	0	0.0	0	0.0			
Moderate	17.2	9	20.9	2,144	50.5			
Middle	58.9	31	72.1	2,039	48.0			
Upper	18.3	3	7.0	61	1.5			
Not Available	0.0	0	0.0	0	0.0			
Total	100.0	43	100.0	4,244	100.0			

Home Mortgage Loans

The geographic distribution of the home mortgage loans reflects a reasonable dispersion in the assessment area. The bank originated one loan in a low-income census tract. Although the bank's performance in this tract is above the percentage of owner-occupied housing units, there is limited lending opportunity in the low-income census tracts. The bank's performance in moderate-income census tracts is lower than, but reasonable, when compared to demographic data

Geographic Distribution of Home Mortgage Loans								
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%			
Low	1.7	1	2.6	840	18.3			
Moderate	16.7	4	10.3	160	3.5			
Middle	62.1	25	64.1	2,122	46.3			
Upper	19.5	9	23.0	1,465	31.9			
Not Available	0.0	0	0.0	0	0.0			
Total	100.0	39	100.0	4,587	100.0			

Small Farm Loans

The geographic distribution of the small farm loans reflects a reasonable dispersion in the assessment area. As shown in the following table, the bank did not originate any loans in low-income census tracts; however, only 2.2 percent of farms are located in low-income census tracts. The bank's level of lending in moderate-income census tracts was above demographic data.

Geographic Distribution of Small Farm Loans								
Tract Income Level	% of Farms	#	%	\$(000s)	%			
Low	2.2	0	0.0	0	0.0			
Moderate	18.0	7	20.6	471	18.7			
Middle	63.7	19	55.9	1,479	58.6			
Upper	16.2	8	23.5	574	22.7			
Not Available	0.0	0	0.0	0	0.0			
Total	100.0	34	100.0	2,524	100.0			
Source: 2020 D&B Data and Ban	k Records. Due to rounding, to	tals may not equal	100.0 percent.					

Borrower Profile

The distribution of borrowers reflects a poor penetration among businesses and farms of different sizes and individuals of different income levels. This conclusion is based on a poor penetration of the small business, home mortgage, and small farm loans.

Small Business Loans

The distribution of borrowers reflects a poor penetration among business customers of different sizes. As illustrated in the following table, the bank's percentage of loans to businesses with revenues of \$1.0 million or less is significantly below demographic data. Although the bank did not originate a majority of its small business loans to businesses with revenues of \$1.0 million or less, revenue was not relied upon for 30.2 percent of the sampled loans.

Distribution of Small Business Loans by Gross Annual Revenue Category								
Gross Annual Revenue (GAR) Level	% of Businesses	#	%	\$(000s)	%			
≤\$1,000,000	83.5	20	46.5	1,284	30.3			
> \$1,000,000	4.4	10	23.3	2,500	58.9			
Revenue Not Available	12.1	13	30.2	460	10.8			
Total	100.0	43	100.0	4,244	100.0			
Source: 2020 D&B Data and Bank Records. Due to				7,277	100.0			

Home Mortgage Loans

The distribution of borrowers reflects a poor penetration among individuals of different income levels. As illustrated in the table below, the bank made only one loan to a low-income borrower and three loans, to moderate-income borrowers which are both significantly below demographic data. Opportunities to lend may be limited given the high poverty rate at 20.9 percent and the median housing value at \$78,999, particularly for low-income borrowers. The bank's poor performance is also mitigated to some extent, as the bank does not originate long-term, fixed-rate residential loans. This loan type is typically more suitable for certain borrowers, particularly lower-income individuals. It is noted that income was not available for 10.3 percent of individuals.

Distribution of Home Mortgage Loans by Borrower Income Level								
Borrower Income Level	% of Families	#	%	\$(000s)	%			
Low	25.5	1	2.6	36	0.8			
Moderate	17.4	3	7.7	131	2.8			
Middle	17.8	11	28.2	880	19.2			
Upper	39.3	20	51.2	3,282	71.6			
Income Not Available	0.0	4	10.3	258	5.6			
Total	100.0	39	100.0	4,587	100.0			
Source: 2015 ACS and Bank Records. Due to rounding, totals may not equal 100.0 percent.								

Small Farm Loans

The distribution of borrowers reflects a poor penetration among farm customers of different sizes. As illustrated in the following table, the bank's percentage of loans to farms with revenues of \$1.0 million or less is significantly below demographic data. However, TBOS originated a majority of their small farm loans to farms with revenues of \$1.0 million or less demonstrating a willingness to lend to small farms. It is noted that the bank did not rely upon revenue for 29.4 percent of the sampled farm loans.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Annual Revenue (GAR) Level	% of Businesses	#	%	\$(000s)	%
≤\$1,000,000	95.5	20	58.8	1,416	56.1
> \$1,000,000	2.7	4	11.8	167	6.6
Revenue Not Available	1.8	10	29.4	941	37.3
Total	100.0	34	100.0	2,524	100.0
Source: 2020 D&B Data and Bank Records. Due to rounding, totals may not equal 100.0 percent.					

Response to Complaints

The bank received no CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

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 bank'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 bank 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.

Branch Information

The following is a list of the bank's branches, their street addresses, and census tracts.

1. Georgia First Bank – Soperton office

1202 Second Street North Soperton, GA 30457 (912)529-4431

Soperton business hours are as follows:

Lobby

Monday, Tuesday, Thursday & Friday 9:00am to 5:00pm Wednesday 9:00am to 12:00pm

<u>Drive-In</u>

Monday-Friday 8:00am to 5:00pm Saturday 9:00am to 12:00pm

ATM 24 hours

2. Georgia First Bank - Vidalia office

121 Church Street Vidalia, GA 30474 (912)403-3019

Vidalia business hours are as follows:

Lobby

Monday-Friday 8:30am to 5:00pm

3. Georgia First Bank – Dublin office

1303 Bellevue Avenue Dublin, GA 31021 (478)410-7515

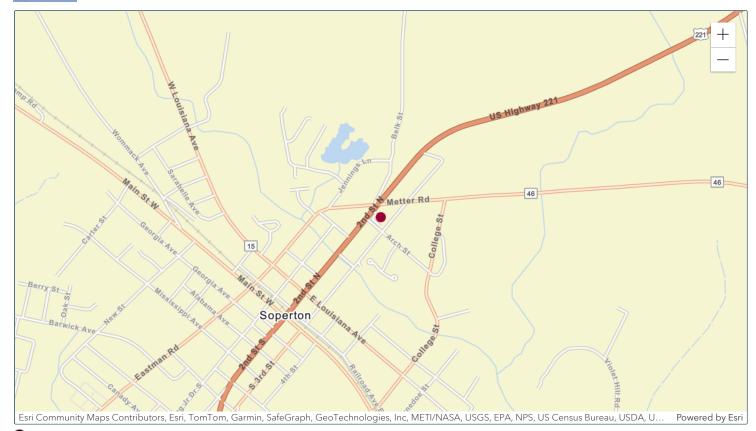
Dublin business hours are as follows:

Lobby & Drive-In

Monday-Friday 8:30am to 5:00pm

4. Glenwood ATM 24 hours

14 W Second Avenue Glenwood, GA 30428



Matched Address: 1202 Second St, Soperton, Georgia, 30457
MSA: NA - NA (Outside of MSA) || State: 13 - GEORGIA || County: 283 - TREUTLEN COUNTY || Tract Code: 9602.00

Selected Tract
MSA: || State: || County: || Tract Code:

Matched Address: 1202 Second St, Soperton, Georgia, 30457 MSA: NA - NA (Outside of MSA) State: 13 - GEORGIA County: 283 - TREUTLEN COUNTY Tract Code: 9602.00

Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	Yes*
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median	\$69,100
Family Income	
2023 Estimated Tract Median Family Income	\$66,647
2020 Tract Median Family Income	\$53,986
Tract Median Family Income %	96.45
Tract Population	5172
Tract Minority %	42.34
Tract Minority Population	2190
Owner-Occupied Units	1064
1- to 4- Family Units	2261

Census Income Information

Middle
\$55,969
\$69,100
32.31
96.45
\$53,986
\$66,647
\$30,363

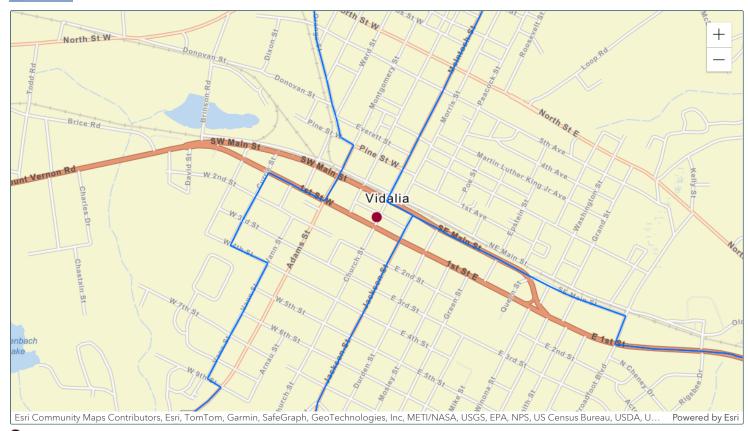
Census Population Information

Consult : Spandaron mornidaron	
Tract Population	5172
Tract Minority %	42.34
Number of Families	1138
Number of Households	1835
Non-Hispanic White Population	2982
Tract Minority Population	2190
American Indian Population	14
Asian/Hawaiian/Pacific Islander Population	7
Black Population	1929
Hispanic Population	123
Other/Two or More Races Population	117

Census Housing Information

Total Housing Units	2291
1- to 4- Family Units	2261
Median House Age (Years)	41
Owner-Occupied Units	1064
Renter Occupied Units	771
Owner Occupied 1- to 4- Family Units	1064
Inside Principal City?	NO
Vacant Units	456

*FFIEC FFIEC Geocoding/Mapping System -- 2023



Matched Address: 121 Church St, Vidalia, Georgia, 30474
MSA: NA - NA (Outside of MSA) || State: 13 - GEORGIA || County: 279 - TOOMBS COUNTY || Tract Code: 9703.02

Selected Tract
MSA: || State: || County: || Tract Code:

Matched Address: 121 Church St, Vidalia, Georgia, 30474 MSA: NA - NA (Outside of MSA) State: 13 - GEORGIA County: 279 - TOOMBS COUNTY Tract Code: 9703.02

Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median	\$69,100
Family Income	
2023 Estimated Tract Median Family Income	\$86,133
2020 Tract Median Family Income	\$69,766
Tract Median Family Income %	124.65
Tract Population	2591
Tract Minority %	39.98
Tract Minority Population	1036
Owner-Occupied Units	707
1- to 4- Family Units	1164

Census Income Information

Upper
\$55,969
\$69,100
5.95
124.65
\$69,766
\$86,133
\$66,591

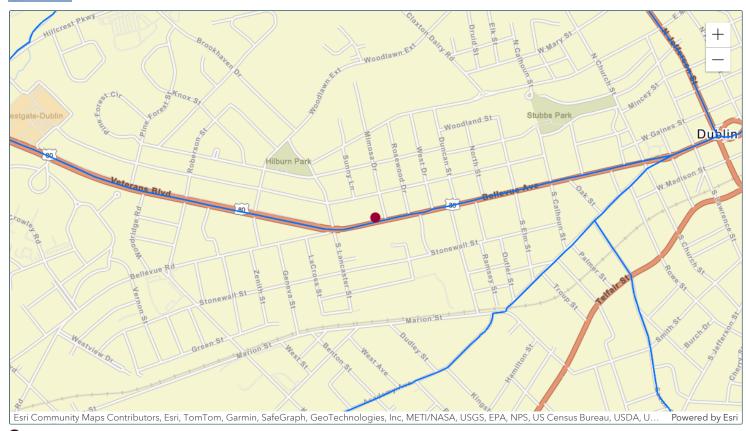
Census Population Information

Tract Population	2591
Tract Minority %	39.98
Number of Families	695
Number of Households	894
Non-Hispanic White Population	1555
Tract Minority Population	1036
American Indian Population	1
Asian/Hawaiian/Pacific Islander Population	37
Black Population	795
Hispanic Population	127
Other/Two or More Races Population	76

Census Housing Information

Total Housing Units	1164
1- to 4- Family Units	1164
Median House Age (Years)	39
Owner-Occupied Units	707
Renter Occupied Units	187
Owner Occupied 1- to 4- Family Units	707
Inside Principal City?	NO
Vacant Units	270

*FFIEC FFIEC Geocoding/Mapping System -- 2023



Matched Address: 1303 Bellevue Ave, Dublin, Georgia, 31021
MSA: NA - NA (Outside of MSA) || State: 13 - GEORGIA || County: 175 - LAURENS COUNTY || Tract Code: 9504.00

Selected Tract
MSA: || State: || County: || Tract Code:

Matched Address: 1303 Bellevue Ave, Dublin, Georgia, 31021 MSA: NA - NA (Outside of MSA) State: 13 - GEORGIA County: 175 - LAURENS COUNTY Tract Code: 9504.00

Summary Census Demographic Information

Tract Income Level	Moderate
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median	\$69,100
Family Income	
2023 Estimated Tract Median Family Income	\$47,057
2020 Tract Median Family Income	\$38,117
Tract Median Family Income %	68.10
Tract Population	4276
Tract Minority %	66.46
Tract Minority Population	2842
Owner-Occupied Units	429
1- to 4- Family Units	1480

Census Income Information

Moderate
\$55,969
\$69,100
36.34
68.10
\$38,117
\$47,057
\$22,739

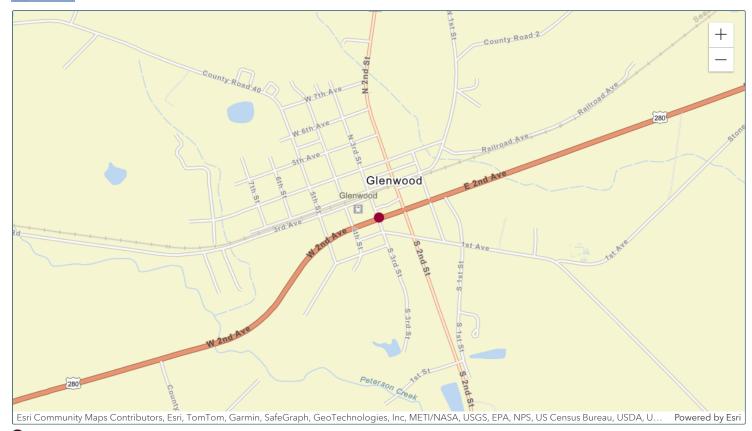
Census Population Information

Concao : opaiacon iniciniacon	
Tract Population	4276
Tract Minority %	66.46
Number of Families	792
Number of Households	1427
Non-Hispanic White Population	1434
Tract Minority Population	2842
American Indian Population	3
Asian/Hawaiian/Pacific Islander Population	159
Black Population	2456
Hispanic Population	98
Other/Two or More Races Population	126

Census Housing Information

Total Housing Units	1778
1- to 4- Family Units	1480
Median House Age (Years)	47
Owner-Occupied Units	429
Renter Occupied Units	998
Owner Occupied 1- to 4- Family Units	423
Inside Principal City?	NO
Vacant Units	351

FFIEC Geocoding/Mapping System -- 2023



Matched Address: 14 W Second Ave, Glenwood, Georgia, 30428
MSA: NA - NA (Outside of MSA) || State: 13 - GEORGIA || County: 309 - WHEELER COUNTY || Tract Code: 7801.00

Selected Tract
MSA: || State: || County: || Tract Code:

Matched Address: 14 W Second Ave, Glenwood, Georgia, 30428 MSA: NA - NA (Outside of MSA) State: 13 - GEORGIA County: 309 - WHEELER COUNTY Tract Code: 7801.00

Summary Census Demographic Information

Tract Income Level	Moderate
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median	\$69,100
Family Income	
2023 Estimated Tract Median Family Income	\$51,756
2020 Tract Median Family Income	\$41,923
Tract Median Family Income %	74.90
Tract Population	2652
Tract Minority %	32.24
Tract Minority Population	855
Owner-Occupied Units	369
1- to 4- Family Units	951

Census Income Information

Moderate
\$55,969
\$69,100
15.09
74.90
\$41,923
\$51,756
\$29,231

Census Population Information

Tract Population	2652
Tract Minority %	32.24
Number of Families	350
Number of Households	532
Non-Hispanic White Population	1797
Tract Minority Population	855
American Indian Population	6
Asian/Hawaiian/Pacific Islander Population	4
Black Population	672
Hispanic Population	79
Other/Two or More Races Population	94

Census Housing Information

Total Housing Units	1011
1- to 4- Family Units	951
Median House Age (Years)	44
Owner-Occupied Units	369
Renter Occupied Units	163
Owner Occupied 1- to 4- Family Units	369
Inside Principal City?	NO
Vacant Units	479

Branches Opened or Closed

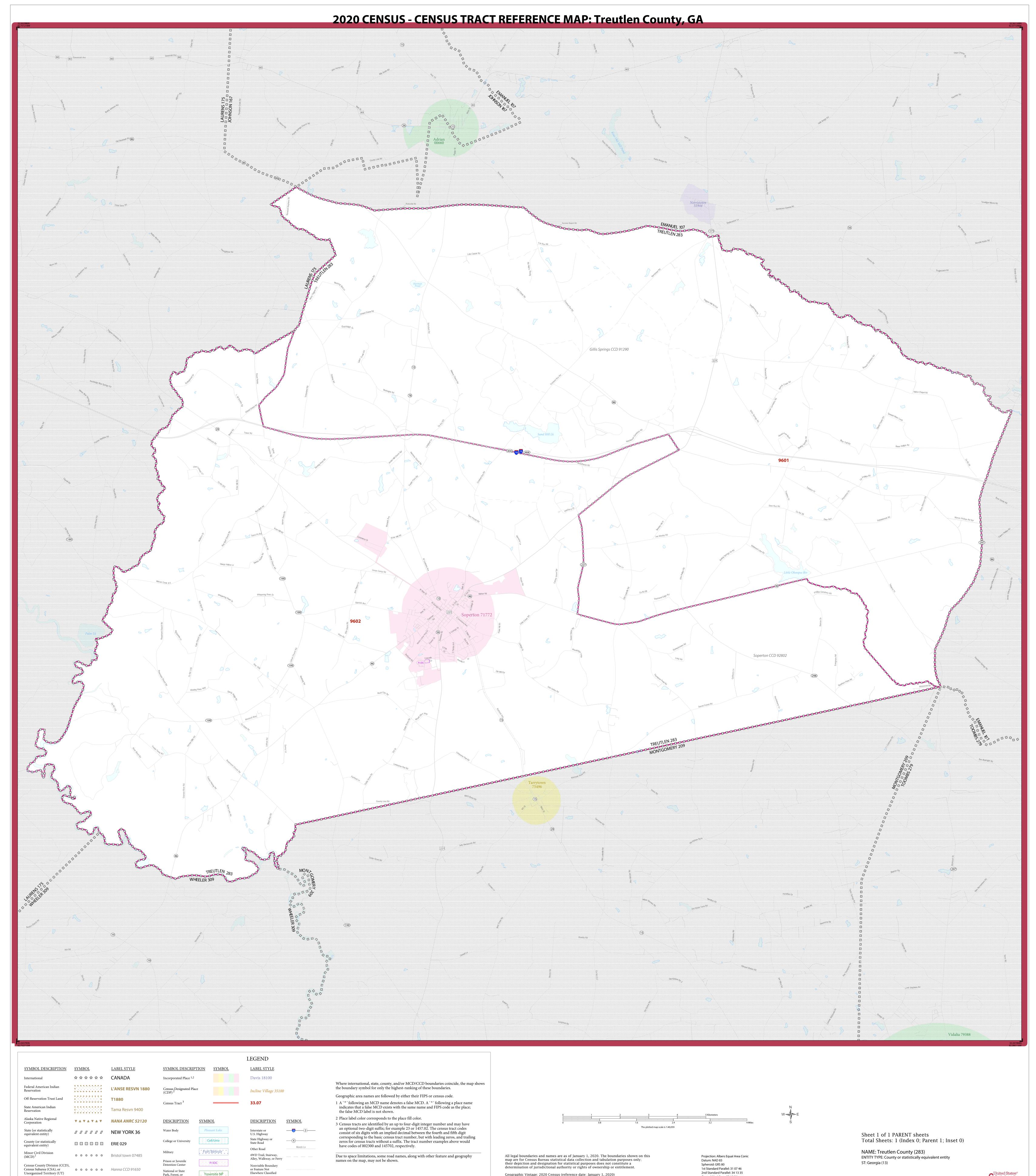
The following is a list of branches opened or closed by the bank during the current year and each of the prior two calendar years.

Georgia First Bank – Dublin office, opened 11/07/2022 1303 Bellevue Avenue Dublin, GA 31021

Assessment Area

Georgia First Bank has defined its assessment area as the following counties in Georgia: Treutlen, Toombs, Laurens, Emanuel, Montgomery, and Wheeler.

The following are maps of each assessment area. These show the boundaries of the area and the identifying census tracts contained in the area.



Geographic Vintage: 2020 Census (reference date: January 1, 2020) Data Source: U.S. Census Bureau's MAF/TIGER database (TAB20) Map Created by Geography Division: January 06, 2021

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

Yosemite NP .

Inset Area

A1

Park, Forest, or

Recreation Area

Outside Subject Area

Unorganized Territory (UT)

Consolidated City

0 0 0 0 0 0 MILFORD 47500

2020 CENSUS TRACT REF MAP (PARENT)

Sheet ID: 249513283001

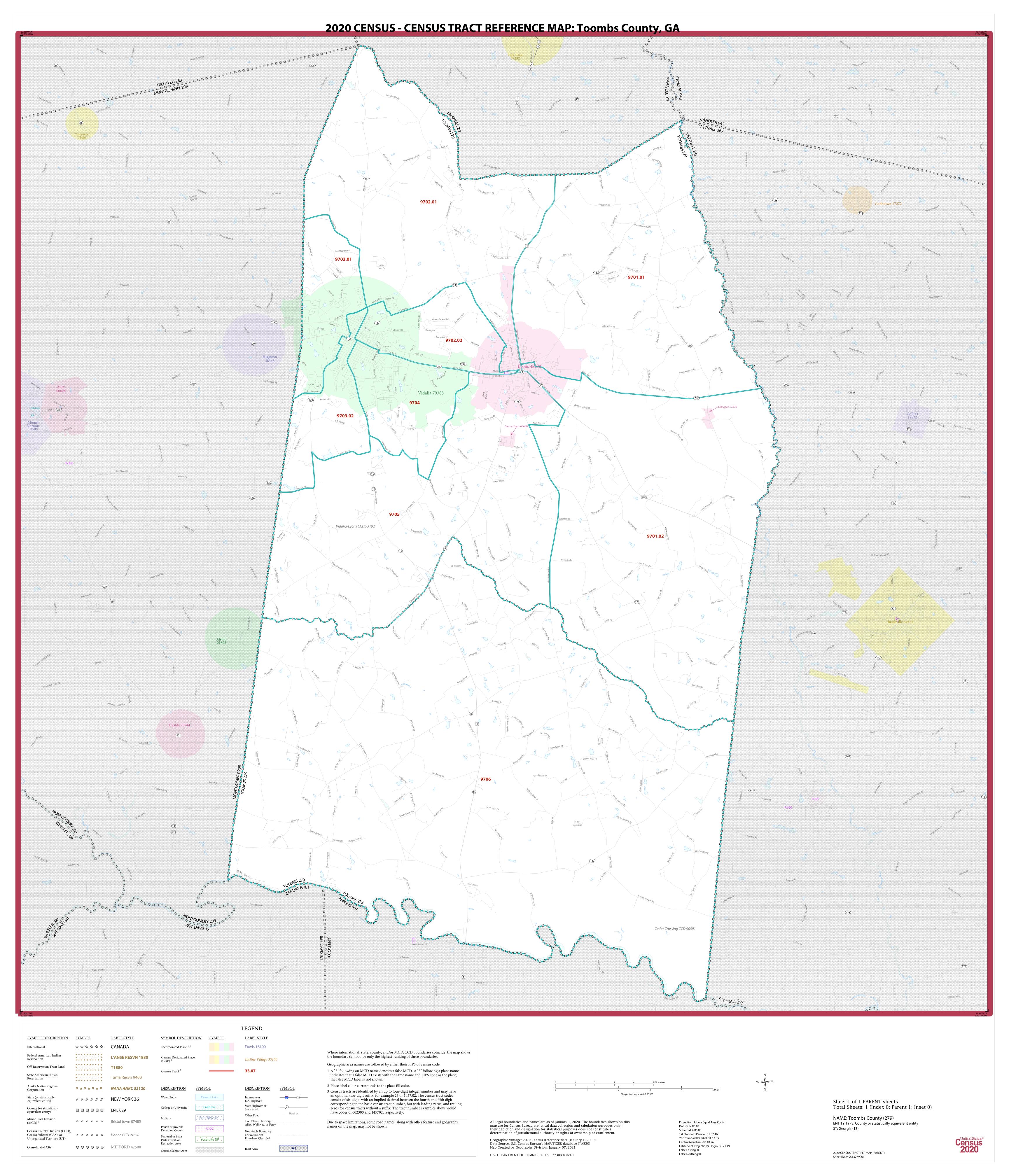
2nd Standard Parallel: 34 13 35

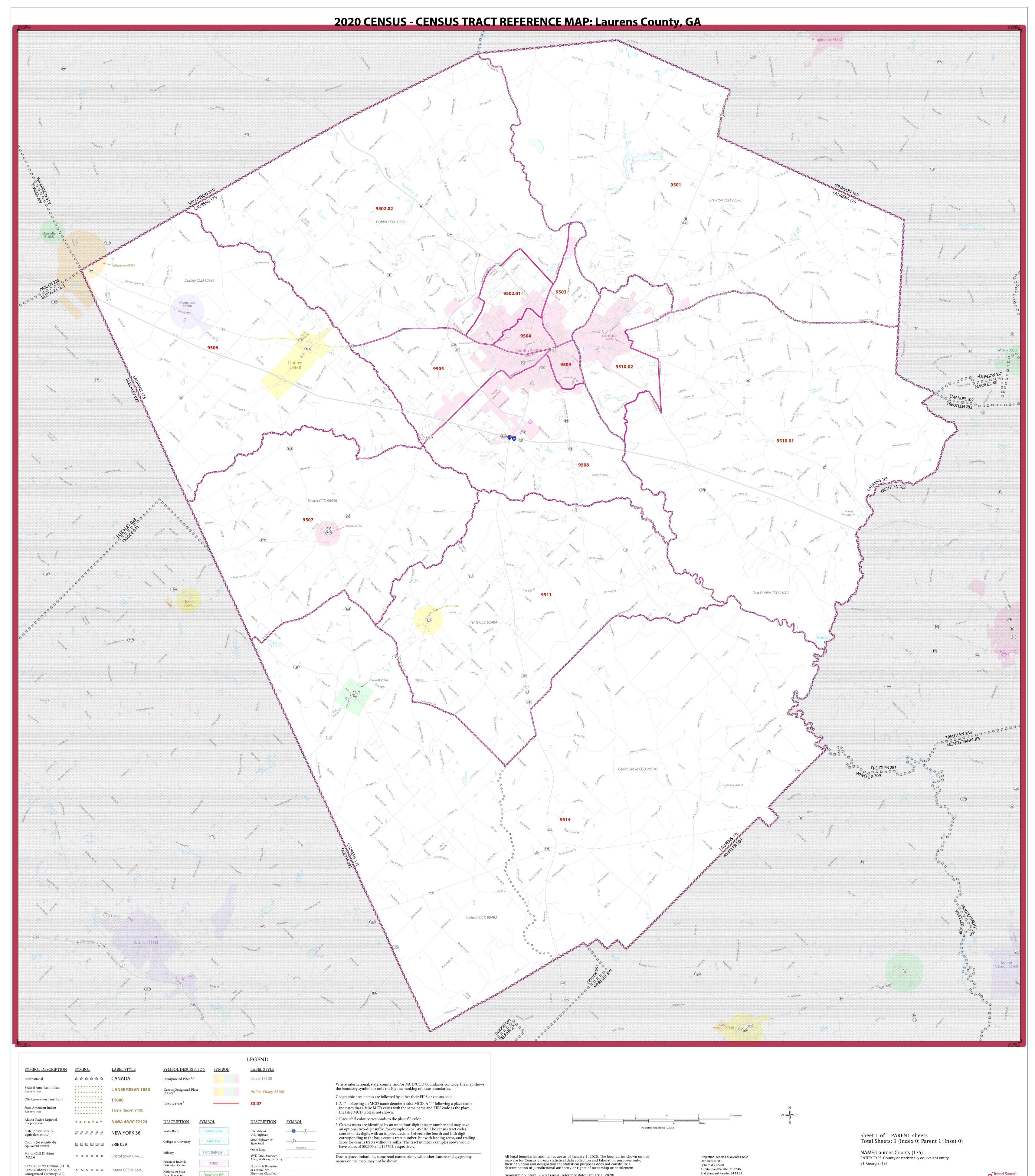
Latitude of Projection's Origin: 30 21 19

Central Meridian: -83 10 26

False Easting: 0

False Northing: 0





Geographic Vintage: 2020 Census (reference date: January 1, 2020) Data Source: U.S. Census Bureau's MAF/TIGER database (TAB20) Map Created by Geography Division: January 06, 2021

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

0 0 0 0 0 0 MILFORD 47500

Unorganized Territory (UT)

Consolidated City

National or State

Park, Forest, or

Recreation Area

Outside Subject Area

Yosemite NP .

Inset Area

A1

2020 CENSUS TRACT REF MAP (PARENT)

Sheet ID: 249513175001

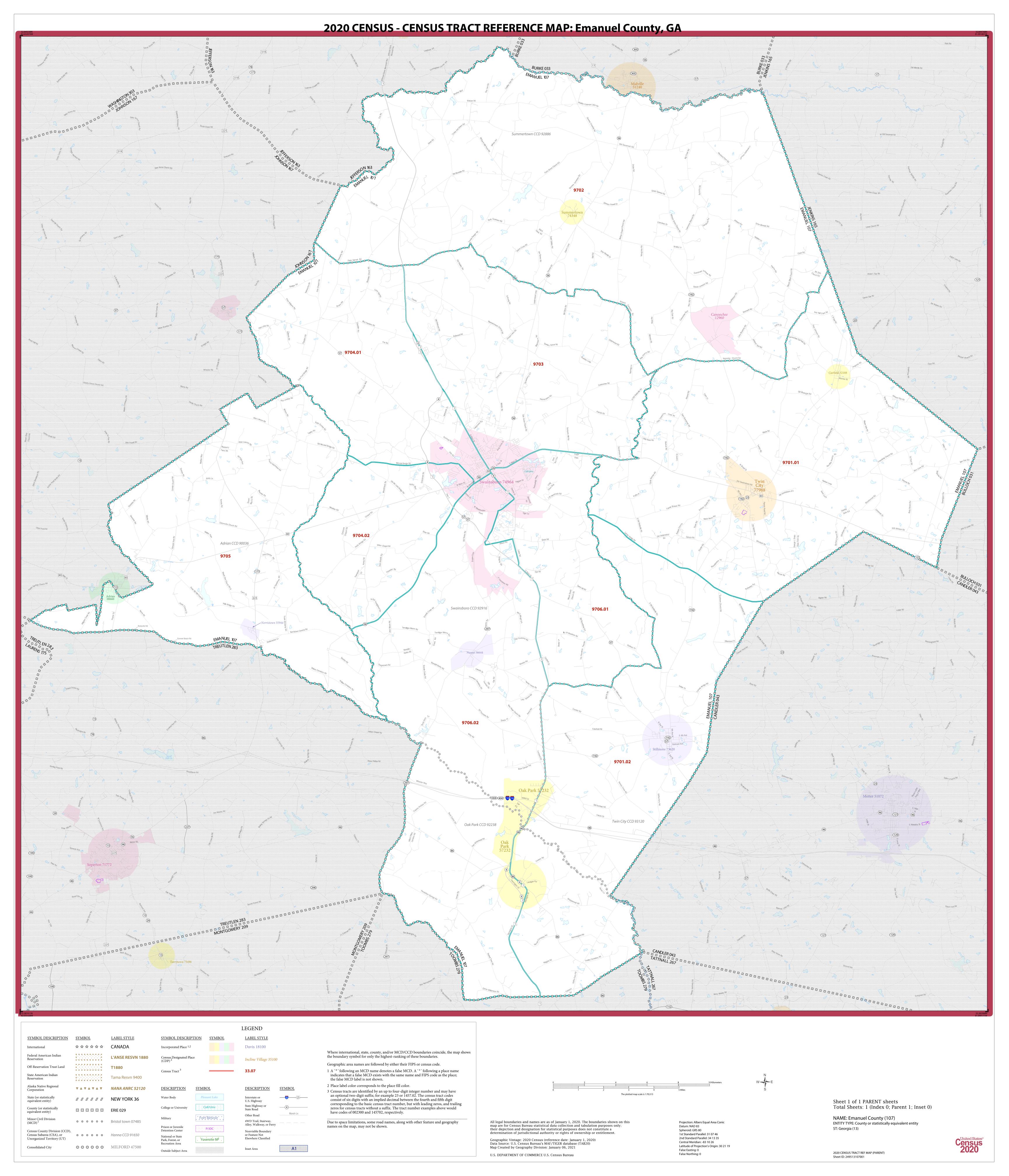
2nd Standard Parallel: 34 13 35

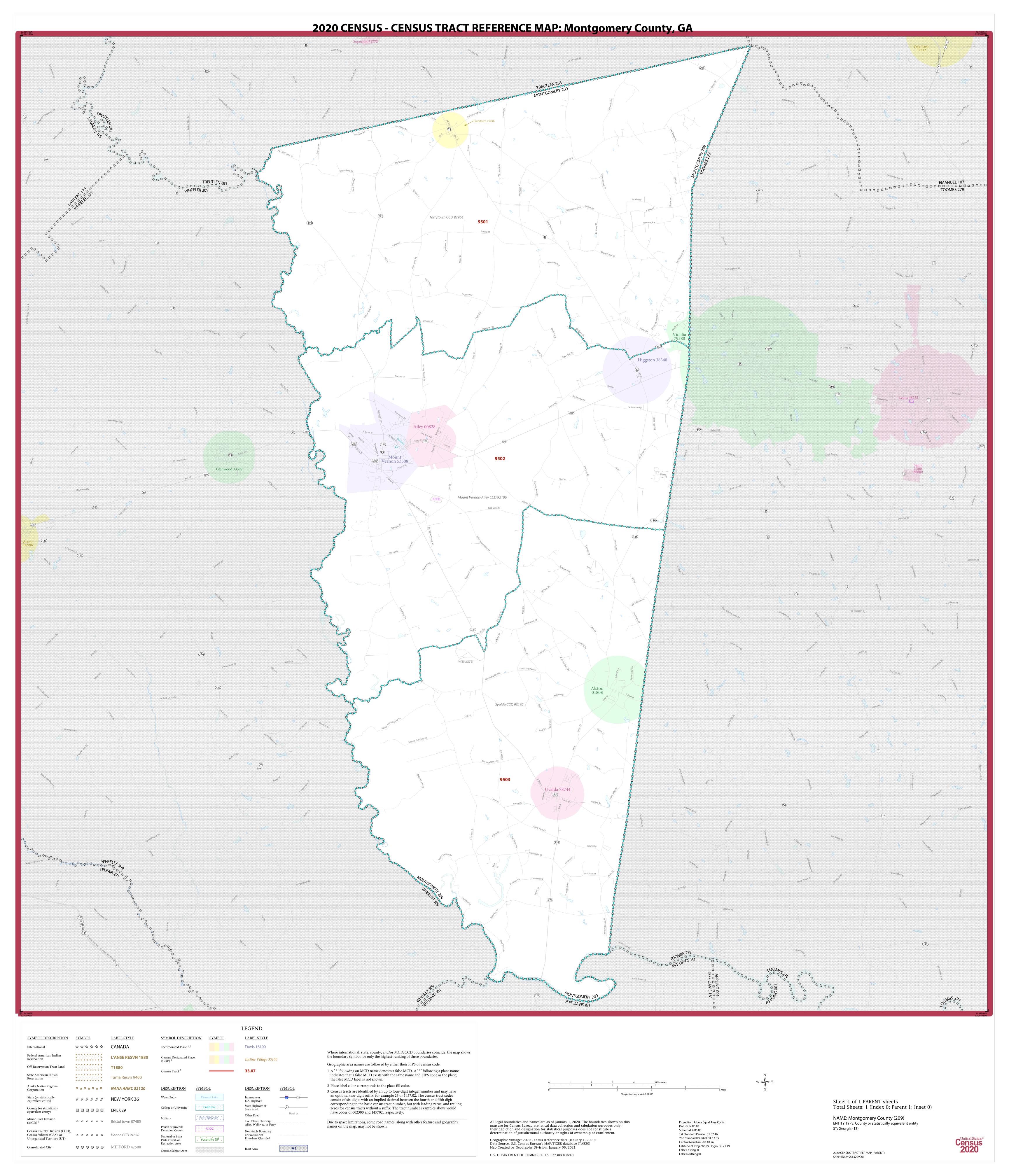
Latitude of Projection's Origin: 30 21 19

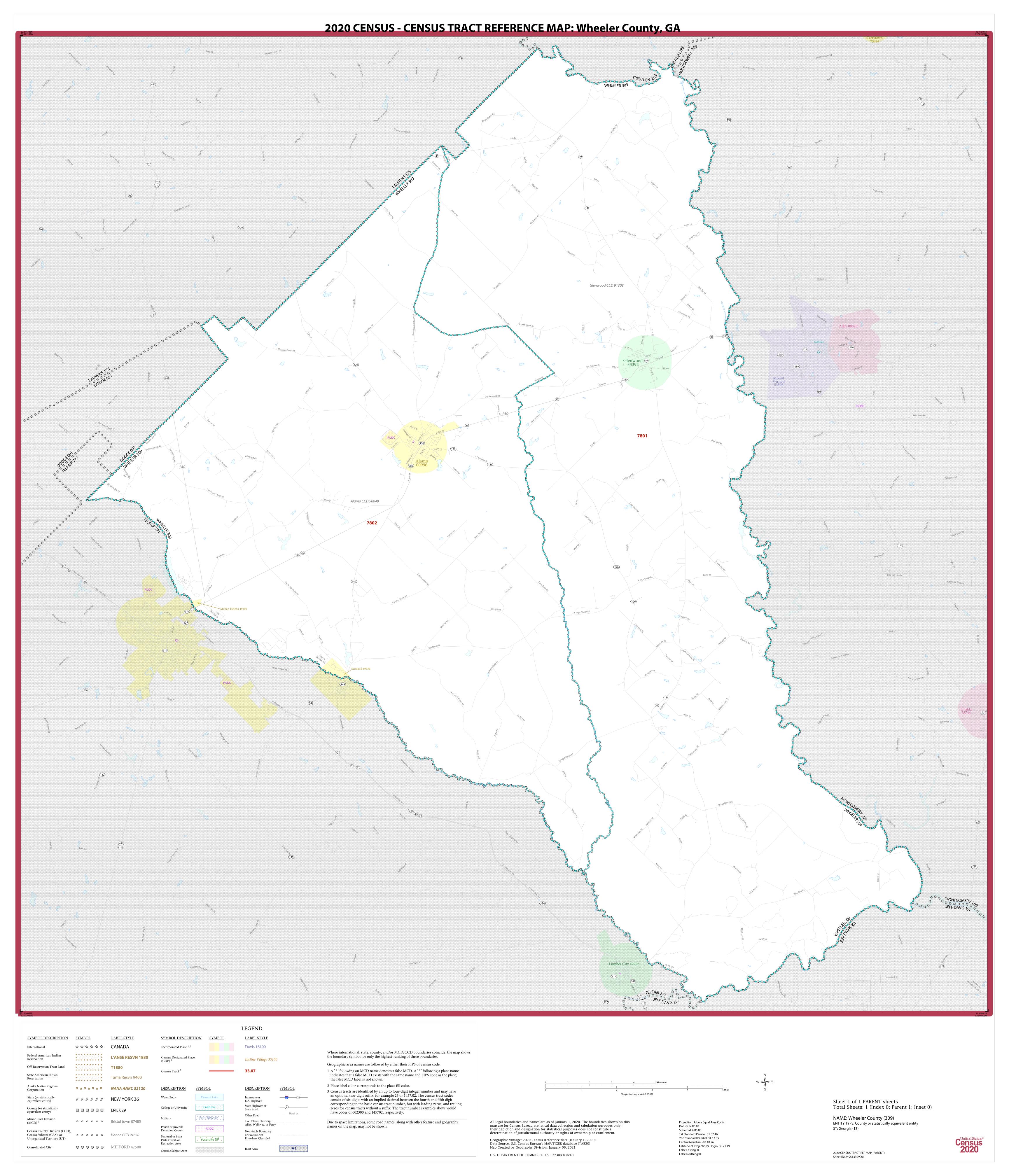
Central Meridian: -83 10 26

False Easting: 0

False Northing: 0







List of Services

The below is a list of banking services generally offered at the bank's branches.

Deposits Accounts

Personal & Business

Checking Accounts

Savings Accounts

Money Market Account

Certificates of Deposit

Individual Retirement Accounts

Loan Accounts

Personal

Auto/Recreational

Debt Consolidation

Personal Expenses

Real Estate

Construction

Business

Term Loans

Lines of Credit

Real Estate

Working Capital

Agriculture Operating Lines of Credit

Other Products & Services offered to our customers

Safe Deposit Boxes (Soperton branch only)

Drive-through banking (Soperton and Dublin only)

ATM (Soperton and Glenwood)

Night depository

Teller transactions

Wire transfers

Debit cards

Cashier's checks

Check orders

Coin rolling (Soperton)

Statement printouts

FEES AND CHARGES. The following fees and charges may be assessed:

Check printing fees vary by the style of check ordered.

Account Research (per hour)	\$25.00
Cashier's Check	\$4.00
Closing DDA/Savings (1st 90 days)	\$15.00
Coin Rolling Fee - NonCustomers	7.000% of the amount rolled
Collections - Incoming	\$2.00
Collections - Outgoing	\$10.00
Copies (per page)	\$0.25
Credit Card Cash Advance	\$5.00
Debit Card Replacement Fee	\$10.00
Fax (per page) - Incoming	\$1.00
Fax (per page) - Outgoing	\$2.00
Foreign drafts	\$35.00
Incoming Wire Fee - Domestic	\$15.00
Incoming Wire Fee - International	\$25.00
Outgoing Wire Fee - Domestic	\$25.00
Outgoing Wire Fee - International	\$85.00
Overdraft Fee - Fee charged for each presentment of an item for paying	
overdrafts created by check, in-person withdrawal, or other electronic	\$35.00
means. You may incur multiple returned item fees and overdraft fees if an	\$33.00
item is presented for payment more than once.	
Printout of Statement	\$3.00
Replace Loan Coupon Book	\$5.00
Returned Item Fee - Fee charged for returning each presentment of an item	
created by check, in-person withdrawal, or other electronic means, when	
there are insufficient funds in your account to pay an item. Returned item	\$35.00
fee may also be referred to as non-sufficient funds fee. You may incur	Ψ33.00
multiple returned item fees and overdraft fees if an item is presented for	
payment more than once.	
Safe Deposit Box - Extra Large	\$60.00
Safe Deposit Box - Large	\$40.00
Safe Deposit Box - Medium	\$20.00
Safe Deposit Box - Small	\$15.00
Safe Deposit Box Key Deposit	\$30.00
Stop Payment (per order)	\$25.00
Tax Levies / Garnishments	\$35.00
Telephone Transfer Fee (includes automated transfers)	\$5.00

NOTE - Safe deposit boxes and coin rolling are currently only offered at the Soperton location. Current as of April 1, 2024

Loan-to-Deposit Ratios

The following are the bank's loan-to-deposit ratios for each quarter of the prior calendar year.

86.68% – March 31, 2023

87.31% – June 30, 2023

87.41% – September 30, 2023

90.91% – December 31, 2023

Public Comments

Written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping meet community credit needs, and any responses to the comments by the bank.

*None