

# Community Reinvestment Act Public File 2023



*FIRST CENTURY BANK, N.A.  
Commerce, Georgia  
Hilton Head Island, South Carolina*



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First Century Bank, N.A.  
1731 N. Elm Street  
Commerce, GA 30529

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770-280-0875

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**Comments  
From  
The  
Public**

2.

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# **OCC Public Evaluation**



## PUBLIC DISCLOSURE

May 22, 2023

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Century Bank, National Association  
Charter Number 24169

1731 North Elm Street  
Commerce, GA 30529

Office of the Comptroller of the Currency

Three Ravinia Drive, Suite 400  
Atlanta, GA 30346

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **Overall CRA Rating**

**Institution's CRA Rating:** This institution is rated Outstanding.

### **CONCLUSIONS:**

The bank exceeds its plan goals for a satisfactory rating and substantially achieves its plan goals for an outstanding rating.

- FCB exhibits an excellent level of qualified lending and investments. FCB exceeded the lending and investment goals for outstanding performance in its assessment areas (AAs) as set forth in its CRA Strategic Plan for the 2020 to 2022 evaluation period.
- FCB exhibits an excellent level of qualified grants and donations. FCB achieved the grants and donations goals for outstanding performance in its AAs as set forth in its CRA Strategic Plan.
- FCB exhibits an excellent level of community development service hours. FCB exceeded the service hours goals for outstanding performance in its AAs as set forth in its CRA Strategic Plan.



## Description of Institution

First Century Bank, National Association (FCB or bank) is a multi-state national bank, headquartered in Jackson County, Commerce, Georgia. The bank is wholly owned by First Century Bancorp., a one-bank holding company located in Roswell, Georgia. In December 2019, the bank completed a merger with First Covenant Bank. On August 27, 2020, the bank opened a branch in Hilton Head Island, Beaufort County, South Carolina. In September 2020, FCB relocated the main office from Hall County, Gainesville, Georgia to its current location. In addition to these two full-service locations, FCB operates two stand-alone Automated Teller Machines (ATM) in Commerce, Georgia and a loan production office in Roswell, Georgia.

As of December 31, 2022, FCB had total assets of \$714.5 million, total loans of \$26.0 million (3.6 percent of total assets), total deposits of \$645 million, and tier 1 capital of \$73.8 million. Total loans include \$17.6 million in commercial, \$7.3 million in real estate, \$215 thousand in individual, and \$847 thousand in other loans. Total deposits are comprised primarily of domestic deposits to individuals, partnerships, and corporations totaling \$616 million with \$29 million of deposits to the United States (U.S.) Government, States, and Political Subdivisions in the U.S.

FCB offers traditional bank products and services including retail and commercial banking, mortgages, and on-line banking services. While FCB operates under a traditional banking model, the bank's lending activities are significantly impacted by strong competition from local, regional, and large financial institutions. In addition, FCB faces competition for deposit and loan products from other non-bank entities, including mortgage loan lenders, finance companies, insurance companies, and money management firms.

To supplement lending activities, FCB offers innovative technology-embedded services to increase core deposits and non-interest income. These products and services include prepaid debit cards for payroll, gifts, travel, and incentives; data processing/outsourcing for client institutions; deposit and payment processing services. The bank offers tax refund advance loans to tax preparation companies and targets residential communities through relationships with property management companies and homeowners' associations. In addition, FCB offers a self-credit builder program which enables customers to re-establish and improve their credit history.

Since the last CRA review, FCB modified its AAs to reflect changes in branch locations. During the evaluation period the bank's designated AAs comprised Hall and Jackson Counties in Georgia, and Beaufort County in South Carolina. Hall County is in the Gainesville Metropolitan Statistical Area (MSA) which is a part of the Atlanta-Athens-Clarke County-Sandy Springs, GA-AL Combined MSA. Jackson County is a non-MSA. Beaufort County is part of the Hilton Head Island-Bluffton MSA. The AAs comply with the CRA regulation and do not arbitrarily exclude low- or moderate-income geographies.

The bank does not have any affiliates or subsidiaries. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to meet the credit needs of the community. FCB received an "Outstanding" rating at its prior CRA review dated April 6, 2020.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period is January 1, 2020 through December 31, 2022. FCB's CRA performance was evaluated pursuant to the FFIEC's CRA Strategic Plan Examination Procedures. The bank's CRA strategic plan was approved by the Office of the Comptroller of the Currency (OCC) by letter dated December 19, 2018, with a stated effective date of January 1, 2019. The 2019-2022 strategic plan was subsequently amended and approved by the OCC by letter dated April 7, 2021, with a stated effective date of May 1, 2021.

The evaluation scope included community development lending and investments, grants and donations, and hours of service as outlined by the CRA Strategic Plan. The annual goals for community development lending and investment activities are stated as a percentage of the bank's average assets as of the end of the preceding calendar year. More specifically, the average assets are defined as those reported in the Call Report of Condition and Income (Call Report) as of the previous calendar year-end. The annual goals for community services grants and donations and service hours are based on dollar amounts funded and qualified service hours performed, respectively.

### **Selection of Areas for Full-Scope Review**

This evaluation includes a full-scope review of the bank's performance in meeting strategic plan goals within the three defined AAs during the evaluation period, which include: Hall County, Georgia; Jackson County, Georgia; and Beauford County, South Carolina. Hall County is located within the Gainesville MSA which is a part of the Atlanta-Athens-Clarke County-Sandy Springs, GA-AL Combined MSA. During 2020, Hall County, Georgia was a designated AA from January 1, 2020, to September 30, 2020. The bank closed its Hall County location during September 2020. From October 1, 2020, to December 31, 2020, the bank added Jackson County, Georgia as an AA due to the merger with First Covenant Bank in December 2019. Jackson County is part of a non-MSA of Georgia. The bank opened a new location in Hilton Head Island, South Carolina in December of 2020, and designated Beauford County, South Carolina as an AA beginning 2021. Beauford County is located within the Hilton Head Island Bluffton MSA. For the periods of 2021 through 2022, FCB's AAs were Jackson County, Georgia and Beauford County, South Carolina.

### **Ratings**

The bank's overall rating is based on the performance an agreed upon in the strategic planning application process.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.



## State Rating

### State of Georgia

#### CRA Rating for the State of Georgia: Outstanding.

The major factors that support this rating include:

- FCB exhibits an excellent level of qualified lending and investments.
- FCB exhibits an excellent level of qualified grants and donations.
- FCB exhibits an excellent level of community development service hours.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN GEORGIA:

The bank exceeds its plan goals for a satisfactory rating and substantially achieves its plan goals for an outstanding rating within the state of Georgia.

#### DISCUSSION OF PERFORMANCE IN HALL COUNTY, GA AND JACKSON COUNTY, GA:

FCB's CRA Strategic Plan established goals for each year of the evaluation period relative to specific AAs. For 2020, goals were set for combined Hall County and Jackson County AAs. The strategic plan states the goals for grants and donations as well as hours of service for 2020 will be met by 74 percent performance in the Hall County AA with the remaining 26 percent met through performance in the Jackson County AA. Hall County was removed as a designated AA due to the branch closure in late 2020; therefore, goals for 2021 and 2022 are specific to the Jackson County AA.

#### Lending and Investments

FCB's lending and investment performance is excellent. FCB exceeded its overall bank goal for an outstanding rating for each year in the evaluation period. In 2020, the bank purchased six municipal revenue bonds (RB) in Hall and Jackson Counties totaling \$2,207,893. The bank also made Paycheck Protection Program (PPP) loans totaling \$348,939 and one Minority-Owned Depository (MDI) investment totaling \$36,064 within the AAs. In 2021, the bank purchased nine municipal RB in Jackson County totaling \$2,593,561. The bank also made PPP loans totaling \$170,590 and five MDI investments totaling \$1,157,850. In 2022, the bank purchased nine municipal RB in Jackson County totaling \$4,041,715.

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE		
Lending and Investments		
Assessment Area	Strategic Plan Goal (% of average assets)	Actual Performance (000's and % of average assets)
Hall County and Jackson County	2020-Satisfactory-0.65%	
	2020-Outstanding-0.90%	\$2,592/\$187,071=1.39%
Jackson County	2021-Satisfactory-0.70%	
	2021-Outstanding-0.93%	\$3,922/\$407,486=0.96%
	2022-Satisfactory-0.67%	
	2022-Outstanding-0.89%	\$4,042/\$423,380=0.95%

## Grants and Donations

FCB's qualified community development grants and donations performance is excellent. FCB achieved its goals for an outstanding rating for each year in the evaluation period. During this evaluation period, FCB donated \$110 thousand to Habitat for Humanity (HFH) for building and repairing LMI houses in Jackson County. In 2020, FCB donated over \$25 thousand to Junior Achievement which provides financial education in school systems that benefit LMI communities and over \$5 thousand to HFH Financial Education Program in Hall County.

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE Grants and Donations		
Assessment Area	Strategic Plan Goal (\$ amount)	Actual Performance (\$ amount)
Hall County and Jackson County	2020-Satisfactory-\$35,000	
	2020-Outstanding-\$40,000	\$45,535
Jackson County	2021-Satisfactory-\$40,000	
	2021-Outstanding-\$45,000	\$45,000
	2022-Satisfactory-\$45,000	
	2022-Outstanding-\$50,000	\$50,000

## Service Hours

FCB's hours of service to qualified organizations performance is excellent. FCB exceeded its goals for an outstanding rating in 2020 and 2022 and exceeded its goal for a satisfactory rating in 2021. Bank employees provided services to various organization within its AAs to support LMI individuals and LMI areas. In 2020, several employees volunteered approximately 76 hours to financial education training to families and in local schools, as well as through participation in committee and board meetings of HFH and Junior Achievement. In 2021, several employees volunteered approximately 64 hours working at the Banks-Jackson Food Bank and Potter's House Shelter, providing financial education training for families, and participation in finance committee meetings of HFH. In 2022, several employees volunteered approximately 80 hours to financial education training for families, participation in finance committee meetings of HFH, and working at the Banks-Jackson Food Bank.

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE Service Hours		
Assessment Area	Strategic Plan Goal (hours)	Actual Performance (hours)
Hall County and Jackson County	2020-Satisfactory-50	
	2020-Outstanding-60	76
Jackson County	2021-Satisfactory-60	64
	2021-Outstanding-70	
	2022-Satisfactory-60	
	2022-Outstanding-70	80

## **Community Contact**

As part of the evaluation process, examiners contact third parties active in the AAs to gain additional insight regarding local economic conditions and to assist in identifying the credit and community development needs. This information helps determine if local financial institutions are responsive to those needs and what credit and community development opportunities are available. For this evaluation, a representative of a local Economic Development Council was interviewed. The contact stated that local banks in the area have been responsive and involved in community development. Banks in the area are always seeking ways to assist with credit needs within the various communities.

## State Rating

### State of South Carolina

#### CRA Rating for the State of South Carolina: Outstanding

The major factors that support this rating include:

- FCB exhibits an excellent level of qualified lending and investments.
- FCB exhibits an excellent level of qualified grants and donations.
- FCB exhibits an excellent level of community development service hours.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN SOUTH CAROLINA:

The bank exceeds its plan goals for a satisfactory rating and substantially achieves its plan goals for an outstanding rating within the state of South Carolina.

#### DISCUSSION OF PERFORMANCE IN BEAUFORT COUNTY AA:

FCB's CRA Strategic Plan established goals for each year of the evaluation period relative to specific AAs. Beaufort County was not a designated AA in 2020 but was a designated AA for 2021 and 2022.

#### Lending and Investments

FCB's lending and investment performance is excellent. FCB met its goal for an outstanding rating in 2021 and exceeded its goal for a satisfactory rating in 2022. In 2021, the bank purchased two municipal bonds totaling \$197,980 and invested in MDI investments of \$87,150. In 2022, the bank purchased one municipal RB in Beaufort County totaling \$139,059 and one MDI investment totaling \$249,000. All the investments are community development qualified.

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE Lending and Investments		
Assessment Area	Strategic Plan Goal (% of average assets)	Actual Performance (000's and % of average assets)
Beaufort County AA	2021-Satisfactory-0.05%	
	2021-Outstanding-0.07%	\$285/\$407,486=0.07%
	2022-Satisfactory-0.08%	\$388/\$423,380=0.09%
	2022-Outstanding-0.11%	

#### Grants and Donations

FCB's qualified community development grants and donations performance is excellent. FCB achieved its goals for an outstanding rating for each year in the evaluation period. During this evaluation period, FCB donated \$35 thousand to several organizations that target LMI individuals. A noteworthy example is \$20 thousand in donations to HFH to build homes for local families on fourteen acres donated to HFH from the Town of Hilton Head.

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b> <b>Grants and Donations</b>		
<b>Assessment Area</b>	<b>Strategic Plan Goal (\$ amount)</b>	<b>Actual Performance (\$ amount)</b>
Beaufort County AA	2021-Satisfactory-\$10,000	
	2021-Outstanding-\$15,000	\$15,000
	2022-Satisfactory-\$15,000	
	2022-Outstanding-\$20,000	\$20,000

### Service Hours

FCB's hours of service to qualified organizations performance is excellent. FCB exceeded its goals for an outstanding rating for each year in the evaluation period. Bank employees provided services to various organization in the AA to support LMI individuals. In 2021, four employees volunteered approximately 41 hours at the Beaufort County HFH to help build homes. In 2022, one employee volunteered approximately 22 hours by participating in Junior Achievement activities at Hilton Head Elementary School. The Junior Achievement Program provides financial literacy and economic empowerment for the next generation. Over 50 percent of students at the Hilton Head Elementary School are eligible for free and reduced lunch. During the year, one employee also volunteered approximately 21 hours through participation at virtual career fairs.

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b> <b>Service Hours</b>		
<b>Assessment Area</b>	<b>Strategic Plan Goal (hours)</b>	<b>Actual Performance (hours)</b>
Beaufort County AA	2021-Satisfactory-20	
	2021-Outstanding-30	41
	2022-Satisfactory-30	
	2022-Outstanding-40	42

### Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to gain additional insight regarding local economic conditions and to assist in identifying the credit and community development needs. This information helps determine if local financial institutions are responsive to those needs and what credit and community development opportunities are available. For this evaluation, a representative of a local County Economic Development was interviewed. The contact stated the current economic conditions are good. The area is becoming a popular spot for vacation and tourism. The area is also a growing retirement community. Local banks are active in the community providing credit expertise to various residents and businesses.



## Appendix A: Scope of Examination

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The following table identifies the time covered in this evaluation, loan products considered, and affiliate activities that were reviewed. The table also reflects the MSAs and non-MSAs that received comprehensive examination review

<b>Time Period Reviewed:</b>	01/01/2020 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Community development loans, investments, services, grants, and donations	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Other Information</b>	
Outstanding-Georgia	Hall County which part of the Gainesville MSA which is a part of the Atlanta-Athens-Clarke County-Sandy Springs, GA-AL Combined MSA. Also, Jackson County which is part of a non-MSA in GA.	
Outstanding-South Carolina	Beaufort County which is part of the Hilton Head Island Bluffton MSA.	

## Appendix B - Summary of State and Multistate Metropolitan Area Ratings

State or Multistate Metropolitan Area Name	State or Multistate Metropolitan Area Rating
Georgia	Outstanding
South Carolina	Outstanding

## Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

**Multifamily:** Refers to a residential structure that contains five or more units.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**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.

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

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

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

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# Branch Information

**First Century Bank, N.A. street addresses and geographies:**

First Century Bank, N.A. dba First Commerce Bank

Main Office

1731 N. Elm Street

Commerce, GA 30529

Geography - Jackson County - County Code 157, Tract Code 0104.00, MSA/MD Code NA

**Branches/Offices**

**First Century Bank, N.A. addresses and geographies:**

First Century Bank, N.A. Branch Office

2 Park Lane

Hilton Head Island, SC 29928

Geography – Beaufort County – County Code 013, Tract Code 0103.00, MSA/MD Code 25940

Southside ATM

60 Ila Road

Commerce, GA 30529

Geography - Jackson County - County Code 157, Tract Code 0104.00, MSA/MD Code N/A

Northside ATM

2251 North Elm Street

Commerce, GA 30529

Geography - Jackson County - County Code 157, Tract Code 0103.00, MSA/MD Code N/A

First Century Bank, N.A.

11660 Alpharetta Hwy., Suite 225

Roswell, GA 30076

Loan Production Office

Geography - Fulton County - County Code 121, Tract Code 0116.47, MSA/MD Code 12060



Jackson County Census Tracts:

101.04
101.05
101.06
101.07
101.08
101.09
102.00
103.00
104.00
105.00
106.01
106.02
107.01
107.03
107.04
107.05
107.06

## Beaufort County Census Tracts

Tract  
Code

0001.00  
0002.00  
0003.00  
0004.00  
0005.01  
0005.02  
0005.03  
0006.00  
0007.00  
0008.00  
0009.01  
0009.02  
0009.03  
0010.00  
0011.01  
0011.03  
0011.04  
0012.00  
0021.01  
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0021.05  
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0021.07  
0021.08  
0021.09

0021.10

0022.01

0022.02

0101.00

0102.00

0103.00

0104.00

0105.00

0106.00

0107.00

0108.00

0109.00

0110.00

0111.00

0112.00

0113.00

9901.00

4.

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# Services

## (hours, products, fees)

## **Hours of Operation:**

**First Century Bank, N.A. dba First Commerce Bank**  
**1731 N. Elm Street**  
**Commerce, GA 30529**

### **Commerce Main Office Lobby**

Monday through Friday	10:00 a.m. to 3:00 p.m.
Saturday	Closed

### **Commerce Main Office Drive-In**

Monday through Thursday	8:30 a.m. to 4:30 p.m.
Friday	8:30 a.m. to 5:00 p.m.
Saturday	Closed

### **Hilton Head Branch Office Lobby**

Monday through Thursday	10:00 AM to 2:00 PM
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## **ATM LOCATIONS**

First Century Bank, N.A. is a member of the Money Pass, Pulse, Money Maker, Maestro, Presto, Accel and Cirrus ATM Network.

Southside Commerce  
ATM Facility  
60 Ila Rd.  
Commerce, GA 30529

Northside Commerce  
ATM Facility  
2281 North Elm Street  
Commerce, GA 30529

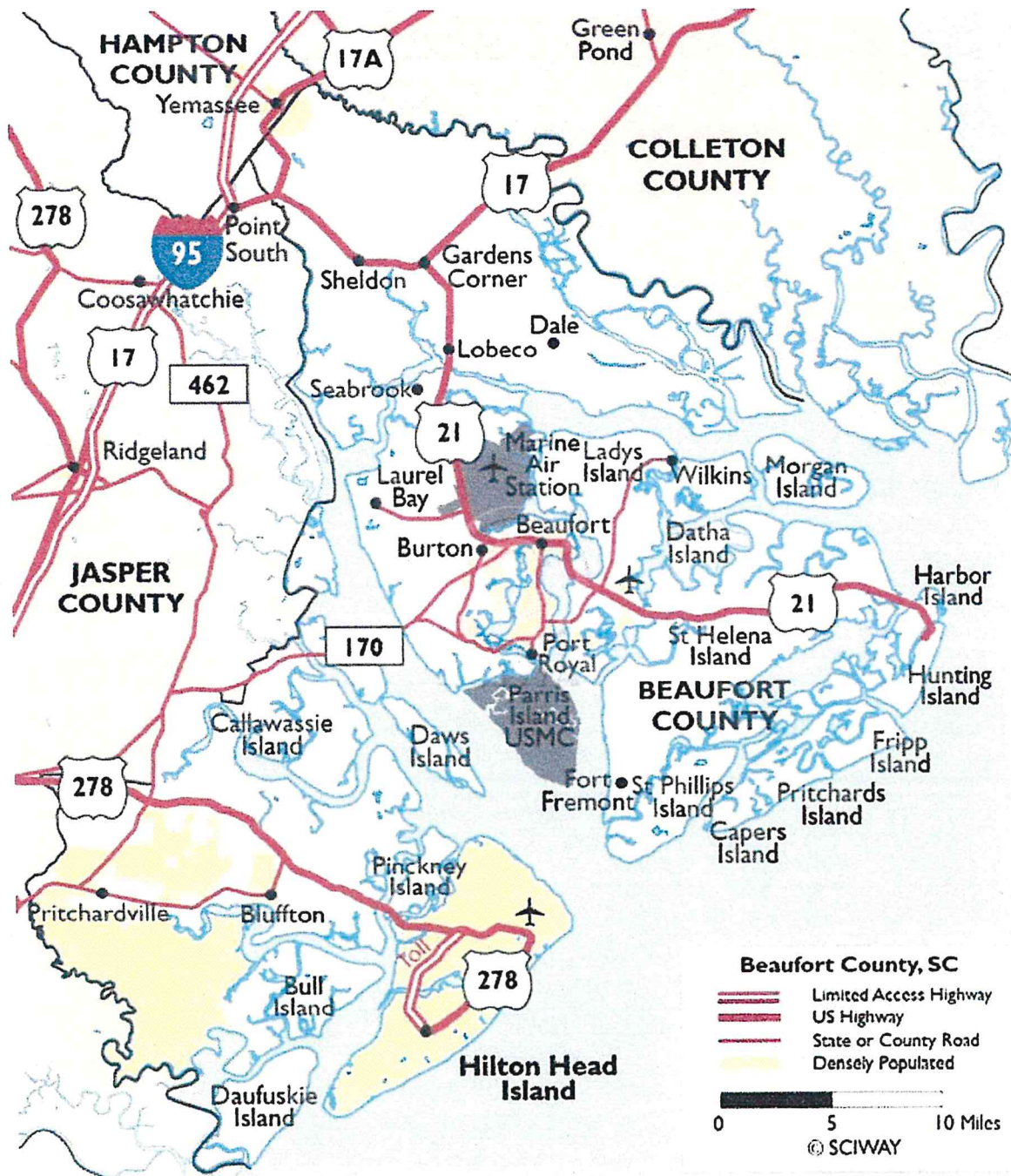
# FIRST CENTURY BANK, N.A.

★ Main Banking Center

● Southside ATM

● Northside ATM









*Welcome to First Century Bank, N.A., a full-service community bank. At First Century Bank, N.A., we mean what we say and we intend to make a difference. Customers will deal directly with decision makers, not order takers. No long waits for loan approval. We will focus on the needs of individuals and small to medium sized businesses. We have local ownership and management with a staff composed of some of the finest talent in the banking industry, a staff that knows you and our community.*

## PRODUCTS AND FEATURES

### SAVINGS ACCOUNTS

All savings accounts have FREE Online Banking

#### PERSONAL SAVINGS

- \$100 minimum to open
- \$5.00 quarterly maintenance fee
- \$250 balance requirement to avoid quarterly fee
- 3 free withdrawals per quarterly statement
- \$3 fee per withdrawal when in excess of 3 per quarter
- Interest compounds daily on collected balance, posting on calendar quarter with quarterly statement. In the event there is electronic activity on the account, interest will be posted monthly via monthly statement.
- Competitive interest rates
- Interest rates are subject to change at any time and determined at bank discretion.

#### JUNIOR SAVINGS

- \$5 minimum to open
- For account holders under the age of 18
- No maintenance fee
- 6 free withdrawals per quarterly statement
- \$3 fee per withdrawal for excess over 6
- Interest compounds daily on collected balance, posting on calendar quarter with quarterly statement. In the event there is electronic activity on the account, interest will be posted monthly via monthly statement.
- Competitive interest rates
- Interest rates are subject to change at any time and determined at bank discretion.

#### HOLIDAY SPREE SAVINGS

- \$25 minimum to open
- No maintenance fee
- \$25 daily collected balance to earn interest
- Interest compounds daily on collected balance, posting on calendar quarter with quarterly statement. In the event there is electronic activity on the account, interest will be posted monthly via monthly statement.
- Account balance plus accrued interest forwarded to owner(s) on the first business day following November 15<sup>th</sup>
- \$20 per debit fee if withdrawn before November 15<sup>th</sup> each year
- Account closes automatically if \$0 balance is maintained for a full calendar quarter
- Interest rates are subject to change any time and determined at bank discretion.

## **PERSONAL CHECKING ACCOUNTS**

All personal checking products have FREE Online Banking, Debit Card and Bill Pay

### **SIMPLE CHOICE CHECKING**

- \$100 minimum to open
- No monthly maintenance fee
- Non-interest bearing
- Unlimited check writing
- Free checks at account opening
- ATM rebates available
- Monthly statement cycle

### **PERSONAL ADVANTAGE CHECKING**

- \$100 minimum to open \$100
- \$15.00 monthly maintenance fee
- \$1,000 minimum balance requirement to avoid a monthly maintenance fee
- Free checks at account opening only
- ATM rebates available
- Monthly statement cycle
- Interest rates are subject to change any time and determined at bank discretion.

## **BUSINESS CHECKING ACCOUNTS**

Unlawful Internet Gambling Notice. Restricted transactions as defined in Federal Reserve Regulation GG are prohibited from being processed through this account or relationship. Restricted transactions generally include, but are not limited to, those in which credit, electronic fund transfers, checks, or drafts are knowingly accepted by gambling businesses in connection with the participation by others in unlawful Internet gambling.

### **BUSINESS CHOICE CHECKING**

- \$100 minimum to open
- \$10 monthly maintenance fee
- \$1,000 minimum balance requirement to avoid a monthly maintenance fee
- Non-interest bearing
- Monthly statement cycle.
- Free online banking, debit card and bill pay

### **BUSINESS ADVANTAGE CHECKING**

- \$1,000 minimum to open
- \$15 monthly maintenance fee
- \$1,000 minimum balance requirement to avoid a monthly maintenance fee
- Tiered interest based on balances:
  - \$0-\$24,999.99
  - \$25,000-\$49,999.99
  - \$50,000 - \$99,999.99
  - \$100,000 & over
- Monthly statement cycle
- Free online banking, debit card and bill pay

### **INTEREST LAWYERS TRUST ACCOUNT (IOLTA)**

- \$1,000 minimum to open
- \$15 monthly maintenance fee
- \$1,000 minimum balance requirement to avoid a monthly maintenance fee
- Free online banking
- Monthly statement cycle

## MONEY MARKET CHECKING ACCOUNTS

### **CENTURY PREFERRED MONEY MARKET**

- \$1,000 minimum to open
- \$15 monthly maintenance fee
- \$1,000 minimum balance requirement to avoid a monthly maintenance fee
- Free online banking
- Tiered interest based on balances:
  - \$0-\$24,999.99
  - \$25,000-\$49,999.99
  - \$50,000 - \$99,999.99
  - \$100,000 & over
- Interest rates are subject to change any time and determined at bank discretion

### **CENTURY PREFERRED BUSINESS MONEY MARKET**

- \$2,500 minimum to open
- \$15 monthly maintenance fee
- \$2,500 minimum balance requirement to avoid a monthly maintenance fee
- Free online banking
- \$10 fee per withdrawal for any in excess of 6 per cycle
- Tiered interest based on balances:
  - \$0-\$24,999.99
  - \$25,000-\$49,999.99
  - \$50,000 - \$99,999.99
  - \$100,000 & over
- Interest rates are subject to change any time and determined at bank discretion.

## CERTIFICATES OF DEPOSIT ACCOUNTS AND INDIVIDUAL RETIREMENT ACCOUNTS (IRAS)

- Required \$500 minimum opening deposit amount
- Interest is compounded daily and may be deposited to your FCB Checking Account monthly or capitalized back to the CD
- Must have a valid tax identification number that will be used to report any interest income earned to the Internal Revenue Service (IRS). Early withdrawal penalties apply.
- Interest rates are subject to change at any time and determined at bank discretion.
- CD Terms Offered:
  - 6 months
  - 12 months
  - 18 months
  - 24 months
  - 36 months
  - 60 months
- APY = Annual percentage yield and assumes interest will remain on deposit until maturity. A withdrawal will reduce earnings.

## LOANS

### PERSONAL LOANS


- For emergencies or any other important major purchase
- Payment may be automatically deducted from your checking account
- Generally lower rates than a credit card

### AUTOMOBILE LOANS

- The money you need for the car you want
- A great way to help you build your credit

### RESIDENTIAL REAL ESTATE LOANS

- Purchase
- Refinance
- Payments calculated on a 25-year repayment period
- Term 3-5 years with a balloon payment at end of term

First Century Bank, N.A. is an Equal Housing Lender. 

## OTHER SERVICES

### ONLINE BANKING

There's nothing like the convenience of electronic banking. Our customers can check balances, transfer funds and correspond with us safely and securely from virtually anywhere. All for no charge. And you can say good-bye to stamps, envelopes and those trips to the bank and post office with Electronic Bill payment.

### BILL PAYMENT

You'll wonder how you ever managed without it. Electronic Bill Payment saves time, money, overhead and other office resources.

- Pay who you want, when you want, in seconds.
- Find out who was paid and when.
- Interact with e-bills give you more control.
- View payment history anytime.
- Benefit from instant record-keeping at tax-time.

### DEBIT MASTERCARD

- The easy, convenient way to access your money quickly
- Accepted like a credit card but works like a check
- Save time by not writing checks
- Use it anywhere Mastercard is accepted
- Get cash when you want it - Just like an ATM card



## **Account Information and Fees**

Free Online Banking and Free Bill Pay  
Free Debit Card (subject to approval)

### **Safe Deposit Boxes**

Size	Annual Fee
3"x 5"	\$50.00
4"x5"	\$50.00
4"x6"	\$50.00
3"x10"	\$75.00
5"x10"	\$100.00
10"x10"	\$145.00

### **Additional Fees:**

Account Research: \$25/hour  
Audit Confirmation: \$25/request  
Chargeback Items: \$5/item  
Check Orders: Varies  
Collection Items: \$10/item  
Counter Checks: \$1 each (10 free)  
Credit/Deposit Verification: \$10/request  
\*Dormant Account Fee: \$5/month (\$60 paid escheat)  
\*\*Insufficient Funds Information:  
    Overdraft Fee: \$35/item  
    Return Item Fee: \$35/item  
Internal Transfer Fee: \$2/transfer  
Levy/Garnishment: \$40/order  
Night Drop Zipper Bag: \$20/bag  
Official Checks: \$8/check  
Photocopies: \$1/page  
Remote Deposit: Varies  
Safe Deposit Box:  
    Drill Fee: \$65  
    Lost Key: \$25  
    Service Call Fee \$55 (split between # of boxes being serviced.)  
    Emergency Service Call (Additional Fee of \$75)  
Stop Payments: \$35 per stop pay  
Wire - Outgoing Domestic: \$25/wire  
Wire - Outgoing International: \$50/wire  
Wire Transfer Incoming: \$15

**\*Dormant Account definitions**

**Demand Deposit Accounts:** deemed to be dormant when the depositor has neither increased or decreased the amount of the deposit nor corresponded with the financial institution regarding the deposit for a period of twelve months.

**Time and Savings Deposits, including Certificates of Deposit:** deemed to be dormant when the depositor has neither increased nor decreased the amount of the deposit or shares nor corresponded with the financial institution regarding the deposit or shares for a period of five years from the date upon which the deposit or share first became eligible for withdrawal.

**\*\*Categories of transactions for which an Insufficient Funds Fee may be imposed are those by any of the following means:** Checks, In person withdrawal, ACH, automatic loan payments, automatic funds transfers, routine service charges or other electronic means. (Includes substitute check options through Check 21 procedures.) Additionally, if a hold is placed on the account by either notification at time of deposit or via electronic memo activity, the fee may apply.

5.

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# **HMDA**

# **Disclosures**



**NOTICE TO MEMBERS OF THE PUBLIC SEEKING HMDA DATA**  
**THE INFORMATION IS AVAILABLE ON THE**  
**CONSUMER FINANCIAL PROTECTION BUREAU WEBSITE**  
**AT**

**<https://ffiec/cfpb.gov/data-publication/modified-lar>**

6.

## First Century Bank Loan-to-Deposit Ratio

(Amounts in thousands)

### March 23, 2023

Loans	\$21,801	
Deposits	\$447,361	
Loan-to-Deposit Ratio		4.87%

### June 23, 2023

Loans	\$23,295	
Deposits	\$418,056	
Loan-to-Deposit Ratio		5.57%

### September 23, 2023

Loans	\$24,640	
Deposits	\$333,488	
Loan-to-Deposit Ratio		7.39%

### December 23, 2023

Loans	\$34,434	
Deposits	\$529,088	
Loan-to-Deposit Ratio		6.51%

Average Loan-to-Deposit Ratio

**SOURCE:** Detail Trial Balance FCBg Combined spreadsheet

Total Loans, Gross

Total Deposits

**6.09%**

7.

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# **Assessment Area**

**FIRST CENTURY BANK, N.A.**  
**2023 ASSESSMENT AREA**

First Century Bank's assessment area (AA) includes Jackson County, Georgia, which is not in an MSA. Due to the latest revised CRA Strategic Plan, effective starting May 1, 2022 through 2023 the assessment area will be Jackson County, Georgia and Beaufort County, South Carolina.

COVID relief programs. In 2020 there were a total of 96,353 such cards with a total load of \$38,236,524 and in 2021 158,536 such cards with a total load of \$134,209,224. Second, the Bank is de-emphasizing CRE loans, and of lending in general, as the primary revenue driver of the Bank. Third, there are several multi-branch financial institutions in the assessment area which are focused on community banking, creating a very competitive retail banking environment in the Bank's assessment area that causes traditional community bank profitability to be very difficult to attain. The Bank has been shifting from primarily offering products through traditional brick and mortar channels, to alternative technology based channels, better aligning with customer preferences and resulting in increased profitability to the Bank. Therefore, the lending test is no longer the best way to evaluate the Bank for CRA in its assessment area. The chart in Appendix A, including Call Report data (Schedule RC-C Parts I and II), demonstrates the decreases in lending at the Bank since 2011. Instead, banks are allowed an alternative to the lending test by developing and implementing an approved strategic plan which the Bank has elected to do.

**a. Goals**

The Bank plans to meet its CRA obligations to the low and moderate income and small business community through investments/loans, service hours and grants as spelled out in section E of this document: CRA Strategic Plan Performance Goals 2023 through 2026.

**b. Effective Date and Term**

The Bank would like to obtain approval for the revised strategic plan from the OCC and begin implementation of the plan starting January 1, 2023. The Bank is already under a current strategic plan that was approved for 2019-2022. The plan will be managed by the Bank's management with oversight by the Board of Directors. Any material changes to the Bank or business environment that would require changes in the plan, will necessitate OCC review and approval before any such modification could take place.

The Bank plans to operate under this strategic plan and be evaluated under this strategic plan for the time period of 2023 through 2026, after which the Bank may develop a new strategic plan.

**D. First Century Bank's Assessment Area**

The Bank's CRA Assessment Area for 2023 is defined as Jackson County, Georgia which is not in an MSA and Beaufort County, South Carolina, due to the opening of a new branch in Hilton Head Island in December of 2020. The Hall County branch closed in September 2020.



### **Information on Jackson County**

The 2010 census shows that the population of Jackson County was 60,485 and for 2020 was 75,907 (an increase of 15,422 or 25.5%). The 2010 Census (2020 census details are not yet available as of March 2022) indicates the 60,485 population is comprised of 15,870 families and 20,917 households and that 8,930 (14.77%) of these live below the poverty line and according to the U.S. Census Bureau 2020 American Community Survey estimates, still 9.3% of the population in Jackson County lives below the poverty line. For 2021 FFIEC estimated median family income is \$53,400. (see charts below)

FFIEC Census Reports (see below charts) indicate that there are a total of 23,756 housing units in Jackson County. Of these, 16,202 (68.20%) are owner occupied, 4,846 (20.40%) are renter occupied, and 2,708 (11.40%) are vacant (see charts below). 2010 FFIEC Census Reports showed 69.54% owner occupied, 23.26% renter occupied and 7.20% vacant. According to city-data.com, new house construction building permits have gone from 82 in 2010 at an average cost of \$172,600 to 1,018 in 2019 at an average cost of \$194,800 a 12.86% increase in cost over the period, lower than average weekly wage growth between 2010 and 2021 of 29.31%. As demonstrated by the numbers, there would be few, if any, developments that would be in the affordable range for the LMI population. It is worthwhile to note that the majority of this activity has been in the Western part of the county in an area greater than 10 miles from the Bank's location.

According to the Georgia Department of Labor Area Labor Profile for Jackson County, unemployment has gone from 10.8% in 2010 to 5.9% in 2020. Additionally, the industry mix has shifted somewhat during that span. In 2010 goods producing industry accounted for 29.1% of employment, service producing 52.4%, government sector 18.4% and unclassified at .2%. In 2021 the mix had changed to 20.6% goods producing (351 businesses), 70.3% service providing (1,217 businesses), 8.9% government sector (58 entities) and .2% unclassified (120 businesses). Of the total 1,746 businesses noted in the 2021 Georgia Area Labor Profile, the top 10 employers in Jackson County were:

- Amazon.com Services, Inc.
- Bed Bath and Beyond, Inc.
- Fox Racing Shox
- HG Georgia Merchants, Inc.
- Hire Dynamics, LLC
- Kubota Industrial Equipment
- TD Automotive Compressor Georgia, LLC
- The William Carter Company
- Wayne Poultry
- Williams-Sonoma Direct, Inc.

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
101.01	Upper	No	151.98	\$53,400	\$81,157	\$69,740	5461	4.12	225	1656	2238
101.02	Upper	No	190.38	\$53,400	\$101,663	\$87,361	6949	12.2	848	1882	2149
101.03	Upper	No	130.41	\$53,400	\$69,639	\$59,844	5442	17.49	952	1495	2060
102	Middle	No	99.12	\$53,400	\$52,930	\$45,486	4988	15.48	772	1307	1833
103	Middle	No	97.51	\$53,400	\$52,070	\$44,744	4488	34.29	1539	834	1505
104	Middle	No	108.28	\$53,400	\$57,822	\$49,688	4712	17.64	831	1120	1791
105	Upper	No	145.02	\$53,400	\$77,441	\$66,544	5280	17.25	911	1520	2195
106	Upper	No	131.06	\$53,400	\$69,986	\$60,139	8787	22.02	1935	2220	3462
107.01	Upper	No	126.17	\$53,400	\$67,375	\$57,895	2234	15.98	357	579	829
107.02	Upper	No	140.56	\$53,400	\$75,059	\$64,500	9737	16.77	1633	2635	3637
107.03	Upper	No	170.78	\$53,400	\$91,197	\$78,368	3342	19.42	649	954	1172
Totals							61,420		10,652	16,202	22,871

Source: FFIEC Census Reports

#### Information on Beaufort County, SC

The 2010 census shows that the population of Beaufort County is 162,233 and for 2020 was 187,117 (an increase of 24,884 or 15.3%). The 2010 Census (2020 census details are not yet available as of March 2022) indicates the 162,233 population is comprised of 70,607 households that 10.9% of the population live below the poverty line and according to the U.S. Census Bureau 2016-2020 American Community Survey 5 year estimates, 9.3% of the population in Beaufort County lives below the poverty line. For 2021 FFIEC estimated median family income is \$73,200. (see below charts)

FFIEC Census Reports (see below charts) indicate that there are a total of 92,858 housing units in Beaufort County. Of these, 46,204 (49.23%) are owner occupied, 19,771 (21.06%) are renter occupied, and 27,883 (29.71%) are vacant (see charts below). According to city-data.com, new house construction building permits have gone from 244 in 2010 at an average cost of \$377,400 to 1,771 in 2019 at an average cost of 379,100 a .45% increase in cost over the period. Between 2015 (the farthest back data located) and 2020 average weekly wages for Beaufort County increased by about 20.4% based on reports in the Bureau of Labor Statistics and the Beaufort County Profile respectively for those years.



Unemployment has gone from 8.7% in 2010 (SC Association of Counties data) to 3.3% in January of 2022 (Beaufort County Profile Rev. 3-14-22). The May 2020 Bureau of Labor Statistics (BLS.gov) indicate that the average weekly wages in Beaufort County were \$844.80 per week as compared to \$888.80 per week for all of South Carolina. As reported in the Beaufort County Community Profile (Rev. 3-14-22), over 87% of workers in Beaufort County work in one of the top 10 industries in the county, which are:

- Accommodation and Food Services
- Retail Trade
- Healthcare and Social Assistance
- Administrative and Support and Waste Management Remediation Services
- Educational Services
- Construction
- Professional, Scientific and Technical Services
- Other Services
- Public Administration
- Arts, Entertainment and Recreation

According to the Beaufort County Community Profile (Rev. 3-14-22), the top 20 employers in Beaufort County were (listed alphabetically):

- Atlantic Personnel Inc.
- Beaufort County School District
- Beaufort Memorial Hospital
- Carecore National LLC
- County of Beaufort
- Department of Defense
- Food Lion
- Gregory M Parker Inc.
- Hargray Communications Group Inc.
- Lowes Home Centers Inc.
- Marine Corps Community Services
- Marriott Resorts Hospitality Corp.
- Montage Palmetto Bluff
- Publix Supermarkets Inc.
- Sea Pines Resort LLC
- Sitel Operating Corporation
- Tenet Physician Services of Hilton Head
- The Greenery Inc.
- The Kroger Company
- Wal-Mart Associates Inc.

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
0001.00	4702	73.84	997	1752	1230	3472	0	0	3247	166	59
0002.00	4754	59.84	1081	1628	1909	2845	0	0	2781	64	0
0003.00	5069	31.45	1347	1502	3475	1594	68	62	796	540	128
0004.00	675	45.48	16	24	368	307	0	9	113	166	19
0005.01	6195	54.14	1668	2394	2841	3354	0	117	2172	806	259
0005.02	5525	46.84	1463	2064	2937	2588	0	0	1720	606	262
0005.03	5289	47.42	1363	1829	2781	2508	0	51	1939	481	37
0006.00	2499	30.85	622	958	1728	1771	0	0	672	43	56
0007.00	5746	37.37	1289	2194	3599	2147	0	51	1059	836	201
0008.00	5310	47.72	1222	2204	2776	2534	44	156	1926	206	202
0009.01	2883	31.95	843	1096	1962	921	0	129	440	339	13
0009.02	8097	19.58	2147	2873	6512	1585	0	81	1165	265	74
0009.03	1852	37.85	498	649	1151	701	0	26	484	162	29
0010.00	4484	36.82	225	225	2833	1651	28	140	389	825	269
0011.01	3614	43.58	1131	1543	2039	1575	0	2	1516	5	52
0011.02	5831	80.11	1132	1960	1160	4671	0	0	3906	404	361
0012.00	944	4.24	364	498	904	40	0	0	0	32	8
0021.01	599	1.34	204	215	591	8	8	0	0	0	0
0021.02	1834	24.1	558	692	1392	442	71	4	82	285	0
0021.03	3692	25.95	904	1292	2734	958	0	127	393	416	22
0021.04	12547	4.42	4079	6419	11993	554	0	69	202	137	146
0021.05	3146	19.33	801	1138	2538	608	0	22	343	162	81
0021.06	9043	33.76	2399	3094	5990	3053	0	225	1372	1098	358
0021.07	11260	49.28	2510	3793	5711	5549	0	16	946	4548	39
0021.08	4863	41.95	1078	1620	2823	2040	0	254	455	1278	53
0022.01	7602	9.98	2426	3447	6843	759	43	112	339	251	14
0022.02	3346	6.66	1157	1458	3123	223	0	8	127	57	31
0101.00	1742	1.26	616	947	1720	22	8	0	0	5	9
0102.00	3888	18.52	1157	1703	3168	720	0	0	149	571	0
0103.00	4507	12.23	1245	2095	3956	551	0	64	11	331	145
0104.00	4844	14.62	1311	2124	4136	708	0	87	510	111	0
0105.00	4036	47.52	921	1501	2118	1918	28	28	722	1047	93
0106.00	4130	5.71	1459	1965	3894	236	0	124	24	65	23
0107.00	4682	3.84	1545	2160	4502	180	0	0	152	28	0
0108.00	4024	82.03	771	1199	723	3301	0	43	845	2391	22
0109.00	1745	12.44	605	832	1528	217	0	11	41	165	0
0110.00	2052	45.52	460	775	1118	934	3	52	527	352	0
0111.00	2350	13.79	776	1058	2026	324	0	0	35	289	0
0112.00	789	2.79	222	403	767	22	0	0	0	10	12



0113.00	1230	9.67	299	652	1111	119	5	0	0	114	0
9901.00	0	0	0	0	0	0	0	0	0	0	0
<b>TOTALS</b>	<b>171,420</b>		<b>44,911</b>	<b>65,975</b>	<b>114,710</b>	<b>56,710</b>	<b>306</b>	<b>2,070</b>	<b>31,600</b>	<b>19,657</b>	<b>3,077</b>

Source: FFIEC Census Reports

Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
0001.00	Moderate	\$63,345	\$73,200	26.44	65.73	\$41,642	\$48,114	\$33,818
0002.00	Moderate	\$63,345	\$73,200	31.48	63.06	\$39,943	\$46,153	\$34,222
0003.00	Moderate	\$63,345	\$73,200	11.43	59.4	\$37,633	\$43,481	\$37,243
0004.00	Moderate	\$63,345	\$73,200	0	61.17	\$38,750	\$44,776	\$29,375
0005.01	Moderate	\$63,345	\$73,200	17.15	79.29	\$50,227	\$58,040	\$47,950
0005.02	Middle	\$63,345	\$73,200	18.57	81.15	\$51,406	\$59,402	\$48,125
0005.03	Middle	\$63,345	\$73,200	18.89	98.3	\$62,270	\$71,956	\$57,926
0006.00	Moderate	\$63,345	\$73,200	23.97	73.67	\$46,667	\$53,926	\$37,262
0007.00	Middle	\$63,345	\$73,200	15.27	97.89	\$62,013	\$71,655	\$47,955
0008.00	Moderate	\$63,345	\$73,200	18.82	60.22	\$38,152	\$44,081	\$38,532
0009.01	Upper	\$63,345	\$73,200	7.6	148.46	\$94,046	\$108,673	\$73,167
0009.02	Middle	\$63,345	\$73,200	11.8	101.22	\$64,124	\$74,093	\$57,265
0009.03	Middle	\$63,345	\$73,200	17.87	114.18	\$72,328	\$83,580	\$69,583
0010.00	Moderate	\$63,345	\$73,200	2.83	71.23	\$45,125	\$52,140	\$45,125
0011.01	Middle	\$63,345	\$73,200	9.1	110.64	\$70,088	\$80,988	\$59,538
0011.02	Moderate	\$63,345	\$73,200	24.94	65.54	\$41,522	\$47,975	\$32,210
0012.00	Upper	\$63,345	\$73,200	2.97	156.87	\$99,375	\$114,829	\$80,577
0021.01	Upper	\$63,345	\$73,200	37.23	132.6	\$84,000	\$97,063	\$85,583
0021.02	Middle	\$63,345	\$73,200	8.23	89.55	\$56,731	\$65,551	\$52,368
0021.03	Middle	\$63,345	\$73,200	2.47	114.27	\$72,388	\$83,646	\$70,084
0021.04	Middle	\$63,345	\$73,200	6.33	106.39	\$67,395	\$77,877	\$61,179
0021.05	Middle	\$63,345	\$73,200	6.78	114.35	\$72,436	\$83,704	\$65,395
0021.06	Middle	\$63,345	\$73,200	9.81	104.76	\$66,366	\$76,684	\$66,061
0021.07	Middle	\$63,345	\$73,200	14.64	94.86	\$60,090	\$69,438	\$56,208
0021.08	Middle	\$63,345	\$73,200	13.43	88.04	\$55,772	\$64,445	\$54,853
0022.01	Upper	\$63,345	\$73,200	4.72	155.54	\$98,533	\$113,855	\$79,865
0022.02	Upper	\$63,345	\$73,200	2.54	152.82	\$96,806	\$111,864	\$86,063
0101.00	Upper	\$63,345	\$73,200	5.46	162.9	\$103,194	\$119,243	\$90,224
0102.00	Upper	\$63,345	\$73,200	5.53	174.54	\$110,563	\$127,763	\$81,125
0103.00	Middle	\$63,345	\$73,200	3.98	112.8	\$71,455	\$82,570	\$60,229
0104.00	Upper	\$63,345	\$73,200	5.9	159.73	\$101,181	\$116,922	\$67,872



0105.00	Middle	\$63,345	\$73,200	18.48	96.76	\$61,289	\$70,821	\$47,058
0106.00	Upper	\$63,345	\$73,200	3.26	168.47	\$106,719	\$123,320	\$85,491
0107.00	Upper	\$63,345	\$73,200	5.49	152.3	\$96,477	\$111,484	\$85,872
0108.00	Moderate	\$63,345	\$73,200	33.75	63.94	\$40,506	\$46,804	\$35,744
0109.00	Upper	\$63,345	\$73,200	12.72	153.73	\$97,386	\$112,530	\$73,438
0110.00	Moderate	\$63,345	\$73,200	12.18	69.49	\$44,024	\$50,867	\$43,873
0111.00	Upper	\$63,345	\$73,200	7.19	145.87	\$92,404	\$106,777	\$76,286
0112.00	Upper	\$63,345	\$73,200	8.49	124.71	\$79,000	\$91,288	\$81,055
0113.00	Middle	\$63,345	\$73,200	5.93	92.29	\$58,466	\$67,556	\$49,911
9901.00	Unknown	\$63,345	\$73,200	0	0	\$0	\$0	\$0

Source: FFIEC Census Reports

Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter-Occupied Units
0001.00	2224	2210	27	No	1438	472	1438	314
0002.00	2109	2046	26	No	1131	481	1131	497
0003.00	1636	1627	36	No	230	134	230	1272
0004.00	96	96	51	No	4	72	4	20
5000.01	2769	2380	24	No	1337	375	1337	1057
0005.02	2456	1693	15	No	768	392	768	1296
0005.03	2129	2045	28	No	1265	300	1265	564
0006.00	1164	1129	57	No	449	206	444	509
0007.00	2812	2592	49	No	1532	618	1517	662
0008.00	2479	1515	27	No	859	275	799	1345
9000.01	1260	1260	19	No	962	164	962	134
0009.02	3480	3330	22	No	2125	607	2061	748
0009.03	742	738	24	No	459	93	459	190
0010.00	254	250	12	No	0	29	0	225
0011.01	2277	2262	21	No	1248	734	1241	295
0011.02	2678	2678	27	No	1568	718	1568	392
0012.00	2049	1603	27	No	474	1551	474	24
0021.01	544	539	14	No	165	329	160	50
0021.02	947	947	11	Yes	571	255	571	121
0021.03	1554	1554	11	Yes	1098	262	1098	194
0021.04	7017	6960	12	Yes	5932	598	5932	487
0021.05	1229	1007	0	Yes	868	91	737	270
0021.06	3599	3399	11	Yes	2133	505	2133	961



0021.07	4070	2671	14	Yes	2033	277	1815	1760
0021.08	2054	1585	22	Yes	934	434	926	686
0022.01	4026	3390	15	Yes	2580	579	2580	867
0022.02	1943	1801	14	No	1192	485	1192	266
0101.00	3287	2270	36	Yes	852	2340	728	95
0102.00	3096	2513	34	Yes	1328	1393	1182	375
0103.00	3218	2074	28	Yes	1536	1123	1250	559
0104.00	2709	2012	13	Yes	1649	585	1514	475
0105.00	1739	1575	22	Yes	977	238	927	524
0106.00	2423	2045	24	Yes	1854	458	1602	111
0107.00	2603	2389	25	Yes	1873	443	1805	287
0108.00	1525	711	31	Yes	323	326	245	876
0109.00	1353	1079	28	Yes	659	521	651	173
0110.00	3331	923	30	Yes	490	2556	382	285
0111.00	4162	2553	30	Yes	743	3104	629	315
0112.00	1729	1039	31	Yes	287	1326	242	116
0113.00	3086	655	33	Yes	278	2434	173	374
9901.00	0	0	0	Yes	0	0	0	0
Totals	93,858	75,145			46,204	27,883	44,172	19,771

Source: FFIEC Census Reports

Beaufort County is made up of 41 census tracts, none of which are defined as low and 11 which are defined as moderate income tracts. 1 tract is designated as "unknown". (see charts below)

Census Tract Income Level	Number of Tracts	Percentage of Tracts
Low	0	0%
Moderate	11	26.83%
Middle	16	39.02%
Upper	13	31.71%
Unknown	1	2.44%
<b>TOTALS</b>	<b>41</b>	<b>100.00%</b>

Tract Code	Tract Income Level	Distressed or Under-Served Tract	Tract Median Family Income %	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1-to-4-Family Units
0001.00	Moderate	No	65.73	\$73,200	\$48,114	\$41,642	4702	73.84	3472	1438	2210
0002.00	Moderate	No	63.05	\$73,200	\$46,153	\$39,943	4754	59.84	2845	1131	2046



0003.0 0	Moderate	No	59.4	\$73,200	\$43,481	\$37,633	5069	31.45	1594	230	1627
0004.0 0	Moderate	No	61.17	\$73,200	\$44,776	\$38,750	675	45.48	307	4	96
0005.0 1	Moderate	No	79.29	\$73,200	\$58,040	\$50,227	6195	54.14	3354	1337	2380
0005.0 2	Middle	No	81.15	\$73,200	\$59,402	\$51,406	5525	46.84	2588	768	1693
0005.0 3	Middle	No	98.3	\$73,200	\$71,956	\$62,270	5289	47.42	2508	1265	2045
0006.0 0	Moderate	No	73.67	\$73,200	\$53,926	\$46,667	2499	30.85	771	449	1129
0007.0 0	Middle	No	97.89	\$73,200	\$71,655	\$62,013	5746	37.37	2147	1532	2592
0008.0 0	Moderate	No	60.22	\$73,200	\$44,081	\$38,152	5310	47.72	2534	859	1515
0009.0 1	Upper	No	148.46	\$73,200	\$108,673	\$94,046	2883	31.95	921	962	1260
0009.0 2	Middle	No	101.22	\$73,200	\$74,093	\$64,124	8097	19.58	1585	2125	3330
0009.0 3	Middle	No	114.18	\$73,200	\$83,580	\$72,328	1852	37.85	701	459	738
0010.0 0	Moderate	No	71.23	\$73,200	\$52,140	\$45,125	4484	36.82	1651	0	250
0011.0 1	Middle	No	110.64	\$73,200	\$80,988	\$70,088	3614	43.58	1575	1248	2262
0011.0 2	Moderate	No	65.54	\$73,200	\$47,975	\$41,522	5831	80.11	4671	1568	2678
0012.0 0	Upper	No	156.87	\$73,200	\$114,829	\$99,375	944	4.24	40	474	1603
0021.0 1	Upper	No	132.6	\$73,200	\$97,063	\$84,000	599	1.34	8	165	539
0021.0 2	Middle	No	89.55	\$73,200	\$65,551	\$56,731	1834	24.1	442	571	947
0021.0 3	Middle	No	114.27	\$73,200	\$83,646	\$72,388	3692	25.95	958	1098	1554
0021.0 4	Middle	No	106.39	\$73,200	\$77,877	\$67,395	12547	4.42	554	5932	6960
0021.0 5	Middle	No	114.35	\$73,200	\$83,704	\$72,436	3146	19.33	608	868	1007
0021.0 6	Middle	No	104.76	\$73,200	\$76,684	\$66,366	9043	33.76	3053	2133	3399
0021.0 7	Middle	No	94.86	\$73,200	\$69,438	\$60,090	11260	49.28	5549	2033	2671
0021.0 8	Middle	No	88.04	\$73,200	\$64,445	\$55,772	4863	41.95	2040	934	1585
0022.0 1	Upper	No	155.54	\$73,200	\$113,855	\$98,533	7602	9.98	759	2580	3390
0022.0 2	Upper	No	152.82	\$73,200	\$111,864	\$96,806	3346	6.66	223	1192	1801
0101.0 0	Upper	No	162.9	\$73,200	\$119,243	\$103,194	1742	1.26	22	852	2270
0102.0 0	Upper	No	174.54	\$73,200	\$127,763	\$110,563	3888	18.52	720	1328	2513
0103.0 0	Middle	No	112.8	\$73,200	\$82,570	\$71,455	4507	12.23	551	1536	2074



0104.00	Upper	No	159.73	\$73,200	\$116,922	\$101,181	4844	14.62	708	1649	2012
0105.00	Middle	No	96.75	\$73,200	\$70,821	\$61,289	4036	47.52	1918	977	1575
0106.00	Upper	No	168.47	\$73,200	\$123,320	\$106,719	4130	5.71	236	1854	2045
0107.00	Upper	No	152.3	\$73,200	\$111,484	\$96,477	4682	3.84	180	1873	2389
0108.00	Moderate	No	63.94	\$73,200	\$46,804	\$40,506	4024	82.03	3301	323	711
0109.00	Upper	No	153.73	\$73,200	\$112,530	\$97,386	1745	12.44	217	659	1079
0110.00	Moderate	No	69.49	\$73,200	\$50,867	\$44,024	2052	45.52	934	490	923
0111.00	Upper	No	145.87	\$73,200	\$106,777	\$92,404	2350	13.79	324	743	2553
0112.00	Upper	No	124.71	\$73,200	\$91,288	\$79,000	789	2.79	22	287	1039
0113.00	Middle	No	92.29	\$73,200	\$67,556	\$58,466	1230	9.67	119	278	655
9901.00	Unknown	No	0	\$73,200	\$0	\$0	0	0	0	0	0
Totals							171,420		56,710	46,204	75,145

Source: FFIEC Census Reports

#### E. CRA Strategic Plan Performance Goals for 2023 through 2026

##### Qualified Community Investment Goals

During the course of the Bank's previous CRA Strategic Plan, the Bank worked with many of the below entities based on the input the Bank received from the community and plans to continue to work with many of these ongoing. the Bank continues to focus its efforts on certain community investment goals. The Bank will also look for and be open to bringing other organizations into the plan as the program matures.

Beaufort County School System – See below table detailing information from the State of South Carolina as of May 2022 (most recent data available). Overall more than 50% of the students in the school system qualify for the Free and Reduced School Lunch Program.

District	SchoolName	% Free & Reduced
Beaufort 01	Battery Creek High School	53.86%
Beaufort 01	Beaufort Elementary School	100%
Beaufort 01	Beaufort High School	39.88%
Beaufort 01	Beaufort Middle School	65.87%
Beaufort 01	Bluffton Elementary School	36.95%
Beaufort 01	Bluffton High School	33.52%

Beaufort 01	Bluffton Middle School (BLMS)	46.38%
Beaufort 01	Broad River Elementary School	100%
Beaufort 01	Coosa Elementary School	26.37%
Beaufort 01	H. E. McCracken Middle School	30.12%
Beaufort 01	Hilton Head Island Early Childhood Center (HHECC)	56.38%
Beaufort 01	Hilton Head Island School for Creative Arts (HHSCA)	61.65%
Beaufort 01	Hilton Head Elementary School, Authorized IB School	58.09%
Beaufort 01	Hilton Head Island High School (HHHS)	33.28%
Beaufort 01	Hilton Head Island Middle School	50.48%
Beaufort 01	Joseph S. Shanklin Elementary School (SES)	100%
Beaufort 01	Lady's Island Middle School	59.07%
Beaufort 01	Ladys Island Elementary Sch	100%
Beaufort 01	May River High School	21.57%
Beaufort 01	M.C. Riley Elementary School	44.70%
Beaufort 01	Mossy Oaks Elementary School	100%
Beaufort 01	Okatie Elementary School	31.62%
Beaufort 01	Port Royal Elementary School	100%
Beaufort 01	Pritchardville Elementary School (PES)	24.12%
Beaufort 01	Red Cedar Elementary (RCES)	44.99%
Beaufort 01	Bluffton Early	32.35%
Beaufort 01	River Ridge Academy	20.80%
Beaufort 01	M.C. Riley Early	46.25%
Beaufort 01	Robert Smalls International Academy	100%
Beaufort 01	Saint Helena Elementary School	100%
Beaufort 01	Whale Branch Early College High School	100%
Beaufort 01	Whale Branch Elementary School	100%
Beaufort 01	Whale Branch Middle School	100%
System Total		50.25%

Junior Achievement – Junior Achievement (“JA”) provides financial education to students across all grade levels in Beaufort County. Based on the statistics above, providing financial education in the school systems provides benefit to the low and moderate income community as over 50% of all students in all schools are on the free and reduced lunch program. The Bank has worked with JA and in several instances has funded and/or provided volunteers to provide much needed financial education to students that they would otherwise likely not receive.

Boys and Girls Club – Frequently over 50% of the participants in Boys and Girls club after school programs qualify for the Free and Reduced School Lunch Program at their school. Boys and Girls Club of Commerce shows that approximately 90% of the current 130 participants in their after school programs qualify for the National School Lunch Program at their school. The Bank intends to continue to work with the Boys and Girls Club to assist in delivering their financial education program for young people.

# **Map of First Century Bank, N.A. Assessment Area**

Commerce – Main Office  
Jackson County

And

Hilton Head Island, South Carolina – Branch Office  
Beaufort County

## **List of Geographies in First Century Bank, N.A. Assessment Area**

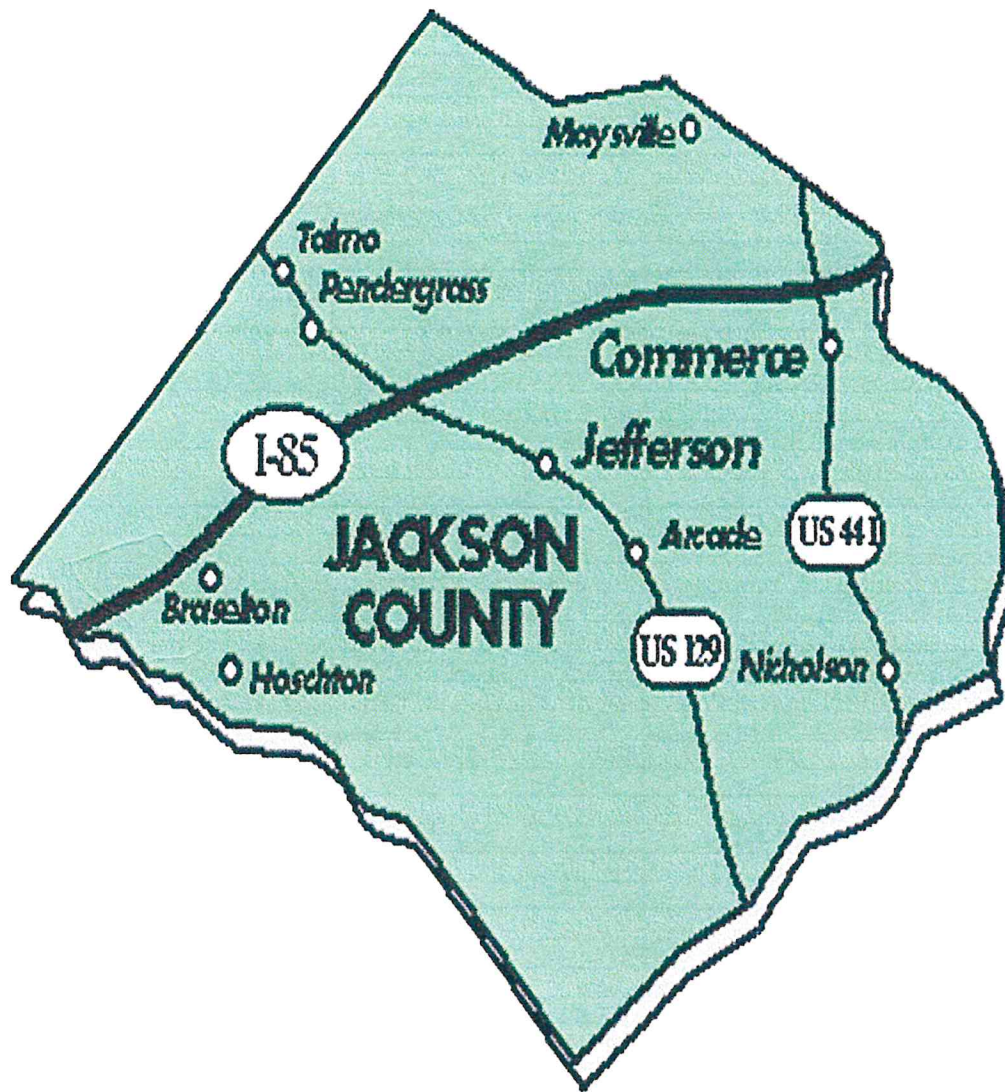


**GEORGIA**

Carl Vinson Institute of Government

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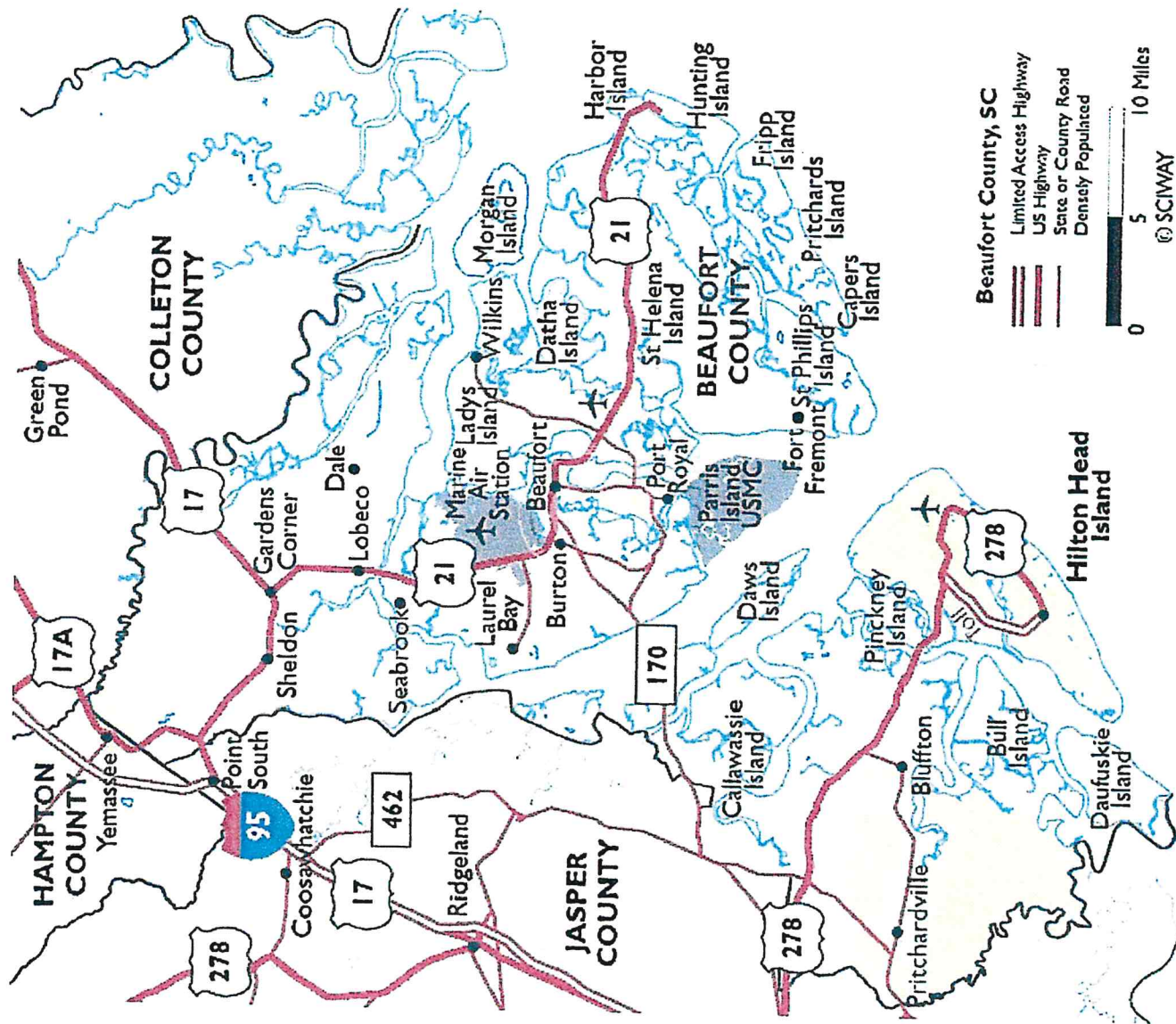
# **Commerce Office**

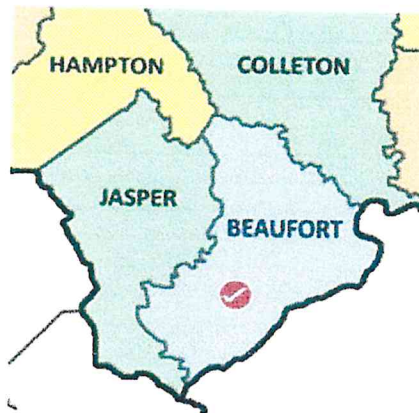


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# **Hilton Head Office**







Original map copyright 2005 digital-topo-maps.com

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8.

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# **CRA Notice**

# COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the Comptroller, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the Comptroller evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a lists of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of this plan.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller: Southern District, 500 North Akard Street, Suite 1600, Dallas, Texas 75201. You may send written comments about our performance in helping to meet community credit needs to Compliance Officer, First Century Bank, N.A. 1731 N Elm Street, Commerce GA 30529 and to the Deputy Comptroller: Southern District, 500 North Akard Street, Suite 1600, Dallas, Texas 75201. Your letter, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Comptroller. You may also request from the Comptroller an announcement of our applications covered by the CRA filed with the Comptroller.

9.

**MISC.**





Office of the Comptroller of the Currency

Washington, DC 20219

October 14, 2022

William Blanton, Chairman of the Board and CEO  
First Century Bank, NA  
1731 N Elm Street  
Commerce, GA 30529

Subject: 2023 – 2026 Community Reinvestment Act Strategic Plan

Dear Mr. Blanton:

The Office of the Comptroller of the Currency (OCC) has approved the 2023 - 2026 Community Reinvestment Act (CRA) strategic plan for First Century Bank NA (the Bank). Our approval is based on the information provided in your strategic plan dated July 29, 2022, that establishes annual measurable goals for the bank's performance under the CRA. This approval confirms the January 1, 2023, effective date of the strategic plan. The bank's performance will be evaluated after the bank has been operating under the plan for at least one year.

As required by 12 CFR § 25.27 of the CRA regulation, the Bank must place a copy of the approved strategic plan in its public file. The bank is not required to include information submitted to the OCC on a confidential basis. In the event of a material change in circumstances, the Bank may request the OCC approve an amendment to the strategic plan. Substantive changes to the Bank's overall business strategy, or to the applicable CRA regulation, would necessitate a new plan or an amendment to the approved plan. The Bank will be required to follow the public participation requirements of the CRA regulation for an amendment to the Strategic Plan.

Should you have questions, please contact Associate Bank Examiner Moses Law at (770) 280-4443 or Compliance Policy Specialist Andrea Shearin at (202) 649-5436.

Sincerely,

*Donna M. Murphy*

Donna M. Murphy  
Deputy Comptroller for Compliance Risk Policy

cc: Jason Sisack, Assistant  
Vonda Eanes, Director for CRA and Fair Lending Policy



# **First Century Bank**

## **Community Reinvestment Act Strategic Plan - 2023-2026**

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- H. Election of Alternative Performance Evaluations**
- I. Appendix A – Comparison of 2010 and 2022 Loan Balances**
- J. Appendix B – Copy of Public Notice**

## **A. About Us**

First Century Bank, N.A. is submitting this new CRA Strategic Plan for 2023-2026 due to the expiration of the current CRA Strategic Plan at the end of 2022.

### **a. Branch Location**

First Century Bank, N.A. ("FCB" or "the Bank") is located at 1731 N. Elm St., Commerce, Georgia, 30529 with an additional branch opened in December of 2020 and located at 19 Shelter Cove Ln, Suite 103, Hilton Head Island, South Carolina, 29928.

### **b. About First Century Bank**

First Century Bank was chartered in 2002 and operates one branch location in Commerce, Georgia and as of December 2020, another branch located in Hilton Head Island, South Carolina.

The Bank is a Nationally Chartered bank and is regulated by the Office of the Comptroller of the Currency (OCC) and deposits are insured up to the amount allowed by law by the Federal Deposit Insurance Corp (FDIC).

The bulk of the Bank's activities are focused around providing Treasury Management Services including but not limited to prepaid card programs, Sponsorship, ACH and Wire Services, while continuing to offer traditional bank products and services including retail banking, commercial banking and online banking services. Most future growth at the Bank is expected to come from pre-paid card programs, lockbox, payment and disbursement services and other similar products and services rather than through more traditional bank products and services.

### **c. CRA Mission**

While First Century Bank offers its primary products to companies and individuals not located in the assessment area, the Bank is committed to serving the credit needs of its CRA assessment area, including the needs of low and moderate income persons and geographies, small businesses and community development organizations.

First Century Bank is committed to developing and maintaining a strong CRA program that:

- Favorably impacts low and moderate income persons and geographies;
- Promotes the Bank's brand;
- Establishes goodwill, trust and credibility with customers, community organizations and regulators;

- Enhances employee satisfaction through a positive impact on the communities where they live and work; and
- Paves the way for the Bank to expand its business strategy and expand into new markets.

d. Products/Services

A comprehensive listing of all products and services offered is included in the Bank's Strategic Plan.

Pre-Paid Cards

The Bank has a significant focus on providing pre-paid cards which it provides through a variety of program managers for marketing, sales and distribution. These programs currently include Payroll Cards, Gift Cards, Native American Relief Cards, Travel Cards, Incentive Cards, Reward Cards and Business to Business (B2B) use cards.

Electronic Banking Products/Services

The Bank offers a variety of electronic banking products and services including online banking, online bill pay, remote deposit capture for businesses, ACH services, wire transfer services and a national mobile check cashing service provided through the use of IngoMoney.

Deposit Products

The Bank offers traditional deposit products for both consumers and businesses including: checking accounts, savings accounts, money market accounts and certificates of deposit.

Loan Products

The Bank offers traditional lending products for both consumers and businesses. For consumers these include: residential mortgage loans, home equity loans, personal loans, automobile loans and tax refund advance loans. For businesses, the Bank offers commercial loans.

e. Competition

The Bank has competition from numerous other financial institutions in Jackson County, Georgia and in Beaufort County, South Carolina. According to FDIC Deposit Market Share Reports for Jackson and Beaufort Counties as of June 30, 2021 there were 9 FDIC insured financial institutions operating in Jackson County with total deposits of \$1.09B and 19 FDIC insured financial institutions operating in Beaufort County with total deposits of \$5.9B (see

tables below) and many of which are multi-branch institutions that focus on community banking.

Institution Name	Beaufort County Deposits as of 6-30-21 (in 000s)	Market Share/Beaufort County as of 6-30-21
<u>Wells Fargo Bank, National Association</u>	\$992,569	16.82%
<u>Bank of America, National Association</u>	\$876,619	14.86%
<u>South State Bank, National Association</u>	\$767,593	13.01%
<u>Coastalstates Bank</u>	\$721,444	12.23%
<u>Truist Bank</u>	\$688,052	11.66%
<u>TD Bank, National Association</u>	\$520,874	8.83%
<u>First-Citizens Bank &amp; Trust Company</u>	\$253,752	4.30%
<u>Regions Bank</u>	\$209,001	3.54%
<u>Palmetto State Bank</u>	\$198,585	3.37%
<u>South Atlantic Bank</u>	\$162,159	2.75%
<u>Ameris Bank</u>	\$122,896	2.08%
<u>Synovus Bank</u>	\$110,157	2.02%
<u>First Federal Bank</u>	\$110,021	1.86%
<u>Pinnacle Bank</u>	\$72,294	1.23%
<u>United Community Bank</u>	\$44,257	0.75%
<u>PNC Bank, National Association</u>	\$38,445	0.65%
<u>Woodforest National Bank</u>	\$2,433	0.04%
<u>First Century Bank, National Association *</u>	\$0	0.00%
<u>Amg National Trust Bank</u>	\$0	0.00%
<b>TOTALS</b>	<b>\$5,900,151</b>	<b>100.00%</b>

\*At the time of the above report, the Hilton Head Island branch had only been open about 6 months. Currently, the HHI branch has originated deposits of approximately \$4MM and is expected to continue to grow.

Institution Name	Jackson County Deposits as of June 30, 2021 (in 000s)	Market Share/Jackson County as of June 30, 2021
First Century Bank, National Association	\$251,254	23.02%
South State Bank	\$227,333	20.83%
Regions Bank	\$116,179	10.65%



The Piedmont Bank	\$114,425	10.48%
United Community Bank	\$110,683	10.14%
Northeast Georgia Bank	\$84,020	7.70%
Wells Fargo, National Association	\$72,008	6.60%
Bank OZK	\$60,800	5.57%
Pinnacle Bank	\$54,642	5.01%
<b>TOTALS</b>	<b>\$1,091,344</b>	<b>100.00%</b>

\*Actual Jackson County deposits made up approximately only \$40,501,747 of the \$251,243,000 First Century deposits.

## B. Historical CRA Performance

The Board of Directors has designated a CRA Officer for the Bank who is responsible for overseeing the Bank's CRA program activities and reporting to the Board as needed. The CRA program is governed by the CRA Policy which is reviewed and approved by the Board of Directors at least annually.

The Bank was last examined for CRA compliance by the OCC in April 2020 and received an Outstanding rating. OCC comments from the exam included:

- Community Development Lending and Investments exceeded the minimum goal for Outstanding performance during the 2019 plan year.
- Community Development Services (Grants and Donations) met the minimum goal for Outstanding performance during the 2019 plan year.
- Community Development Services (Hours of Service) exceeded the minimum goal for Outstanding performance during the 2019 plan year.

The OCC has not identified that this institution (or any affiliate whole loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

Historical performance relevant to the proposed goals of this CRA Strategic Plan is documented below (Note that the Gainesville branch closed in Sept. 2020 and Jackson County wasn't incorporated into the previous plan until 10-1-20. Hilton Head Island was not opened until Dec. 2020):

For relevant investment/loan activity, the Bank had the following in regard to First Century Bank in Hall County, where the bank operated a branch until September 2020:

**2017**

Date Purchased	Name	Principal Amount
9-21-17	GNMA II Pool BC5390	\$486,417
12-18-17	Gainesville School District	\$207,274
TOTAL		\$693,691

**2018**

None

**2019**

Date Purchased	Name	Principal Amount
3-18-19	GA St Hsg & Fin Auth	\$645,903
3-18-19	Hall County School District	\$518,219
TOTAL		\$1,164,122

Additionally the bank had deposits at a CDFI/MDFI qualified institution as of 12-31-19 of \$7,123,469.

**2020 (until branch closure in Sept)**

4-6-20	Various GA St Hsg & Fin Auth	\$1,137,286
4-9-20	Gainesville & Hall Cnty GA Hosp Auth	\$1,070,607
Q2	Hall County PPP Loans	\$175,134
As of 6-30-20	Deposits with MDFI	\$36,064
TOTAL		\$2,419,091

**2021 (Jackson County Assessment Area)**

5-21-21	GA Hsg & Fin Auth REV	\$251,933
5-21-21	Jackson County GA Schools	\$211,138
6-16-21	GA Hsg & Fin Auth REV	\$369,285
6-28-21	Jackson County GA Schools	\$467,513
9-17-21	City of Commerce Pub Fac Auth	\$232,726
10-6-21	GA Hsg & Fin Auth REV	\$53,925
10-6-21	GA Hsg & Fin Auth REV	\$152,753
10-6-21	GA Hsg & Fin Auth REV	\$250,325
10-22-21	Jackson Co Wtr & Swr	\$603,965
Various Dates	Jackson Co PPP Small Bus Loans	\$116,964
MDFI Deposits	MDFI Deposits	\$1,157,850
TOTAL		\$3,868,375

**2021 (Beaufort County Assessment Area)**

5-21-21	SC Hsg & Fin Auth REV	\$137,115
11-17-21	Beaufort Co Schools	\$60,865

MDFI Deposits	MDFI Deposits	\$87,150
TOTAL		\$285,130

**2022 (Jackson County Assessment Area through April 2022)**

2-28-22	Jefferson Bldg Auth	\$81,146
2-28-22	GA Hsg & Fin Auth	\$48,137
3-8-22	GA Hsg & Fin Auth	\$527,473
3-10-22	Jackson Co School District	\$104,001
3-15-22	GA Hsg & Fin Auth	\$728,399
3-15-22	GA Hsg & Fin Auth	\$626,654
3-15-22	GA Hsg & Fin Auth	\$775,551
3-16-22	GA Hsg & Fin Auth	\$840,590
3-16-22	GA Hsg & Fin Auth	\$309,764
TOTAL		\$4,041,715

**2022 (Beaufort County Assessment Area through April 2022)**

None

For Grants and Donations the Bank had:

**2017**

Date	Description	Amount
October	Junior Achievement/Tadmore Elem	\$3,750
October	JA West Hall HS Financial Literacy Program	\$11,000
December	JA Financial Education program at YMCA	\$8,270
December	Habitat for Humanity Downpmt. Assistance	\$9,000
TOTAL		\$32,020

**2018**

1-5-18	JA/Sugar Hill Elem	\$900
2-22-18	JA/Gainesville Exploratory Academy	\$1,300
4-18-18	JA Discovery Center/Hall Co MS students	\$32,070
9-28-18	JA/Tadmore Elem	\$4,950
TOTAL		\$39,220

**2019**

3-15-19	JA Discovery Center/Hall Co MS students	\$25,000
4-9-19	Habitat for Humanity Downpmt. Assistance	\$5,000
10-28-19	JA Discovery Center/Hall Co MS students	\$5,000
TOTAL		\$35,000



**2020 (with Jackson County Added to CRA Plan 10-1-20)**

1-22-20	Funding for Financial Education Program	\$5,275
	Hall County Habitat for Humanity	
3-10-20	JA Discovery Center/Hall Co MS students	\$25,000
10-9-20	Jackson County Habitat for Humanity	\$15,000
	For New Home Build	
TOTAL		\$45,275

**2021 (Jackson County Assessment Area)**

1-11-21	Habitat for Humanity New Home Build	\$20,000
4-16-21	Habitat for Humanity/Home Repair/ Down Pmt Assistance/Virtual Learning	\$13,500
10-4-21	Habitat for Humanity New Home Build	\$11,500
TOTAL		\$45,000

**2021 (Beaufort County Assessment Area)**

5-25-21	Junior Achievement Programs	\$5,000
10-29-21	Habitat for Humanity Affordable Housing Program	\$10,000
TOTAL		\$15,000

**2022 (Jackson County Assessment Area through April 2022)**

2-24-22	Habitat for Humanity New Home Build	\$23,500
TOTAL		\$23,500

**2022 (Beaufort County Assessment Area through April 2022)**

None

For Service Hours for the Bank had:

**2017**

Oct-Nov	Junior Achievement	65.3 Hours
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**2018**

Feb-July	Habitat for Humanity Financial Literacy	23 Hours
Jan-May	Junior Achievement	108 Hours
Jan-Aug	Junior Achievement Board Meetings	3 Hours
TOTAL		134 Hours

**2019**

2019	Junior Achievement Board Meetings	1.3 Hours
Oct 15-23	JA Finance Park for Hall Co MS students	45.5 Hours

12-3-19	Habitat for Humanity to discuss Financial Literacy Program	1.5 Hours
TOTAL		48.3 Hours

**2020 (with Jackson County Added to CRA Plan 10-1-10)**

Jan 13-14	JA Finance Park for Hall Co MS students	26 Hours
3-11-20	JA Board Meeting	1.5 Hours
Jan-Aug	Jackson County Habitat for Humanity Finance Committee Meetings	6 Hours
8-29-20	New Home Dedication	2 Hours
Aug-Sept	Jackson County Habitat for Humanity Financial Education Training for Families	12 Hours
Oct-Nov	Jackson County Habitat for Humanity Financial Education Training for Families	25 Hours
Oct-Dec	Jackson County Habitat for Humanity Finance Committee Meetings	2 Hours
TOTAL		74.5 Hours

**2021 (Jackson County Assessment Area)**

Jan-Dec	Jackson County Habitat for Humanity Finance Committee Meetings	9.5 Hours
Sept-Dec	Banks-Jackson Food Bank Unload/ Food at the Food Bank	27.5 Hours
December	Jackson County Habitat for Humanity Financial Education Training for Families	5 Hours
December	Potter's House Shelter Shopping For Needed Items for Residents	22 Hours
TOTAL		64 Hours

**2021 (Beaufort County Assessment Area)**

Oct-Nov	Habitat for Humanity Homebuild volunteer	41 Hours
TOTAL		41 Hours

**2022 (Jackson County Assessment Area through April 2022)**

Jan-April	Jackson County Habitat for Humanity Financial Education Training for Families	22.5 Hours
Jan-April	Jackson County Habitat for Humanity	5.5 Hours
Jan-April	Banks-Jackson Food Bank Unload/ Distribute Food at the Food Bank	10.5 Hours
TOTAL		38.5 Hours

**2022 (Beaufort County Assessment Area through April 2022)**

3-17-22	Junior Achievement Career Fair	11 Hours
TOTAL		11 Hours

Quarterly average assets as reported on the Call Report for First Century Bank over the last 3 years are as follows:

Q1 2022	Q4 2021	Q3 2021	Q2 2021	Q1 2021	Q4 2020
\$629,301	\$396,341	\$336,328	\$367,347	\$593,503	\$372,387
Q3 2020	Q2 2020	Q1 2020	Q4 2019	Q3 2019	Q2 2019
\$337,839	\$362,491	\$557,230	\$271,678	\$157,211	\$151,672

Note: First Covenant Bank merged into First Century Bank as of December 2019.

**C. First Century Bank's CRA Strategic Plan**

Under existing CRA rules, First Century Bank is considered to be a small bank, and as such is subject to the lending test which is designed to evaluate a bank's lending activities within its designated CRA assessment area. There are several factors which led First Century to prepare a CRA Strategic Plan as an alternative to the standard lending test for CRA purposes. First, the Bank's strategic focus is on delivering deposit and payment transactional products via electronic systems to a national client base. And while many of these initiatives in which the Bank is engaged do serve to meet the financial needs of the underbanked or unbanked across the country, they do not currently qualify as CRA qualified activities under the CRA rules as they are written today. For example, the Bank engages in a significant amount of tax refund advance lending during tax season. Typically, taxpayers who have an Earned Income Credit (EIC) make up between 69% and 74% of the tax refund loan dollars provided by the Bank. The actual tax refund advance loan dollars lent to EIC recipients also continues to grow from \$31,420,030 in 2019 to \$395,011,225 in 2022, an increase of 1,157%. Another program is the national mobile check cashing service that the Bank provides utilizing mobile app technology from IngoMoney. It is expected that most of the individuals who use the mobile check cashing service are unbanked or underbanked and provides an alternative to expensive check cashing stores. Using the mobile app technology, in 2020 the Bank cashed checks for 563,558 customers amounting to \$705,762,189, in 2021 the Bank cashed checks for 649,383 customers amounting to \$805,680,982, and in the first five months of 2022 the Bank has cashed checks for 264,518 customers totaling \$212,475,490. Additionally, the Bank provides prepaid cards to Native American Tribes for certain need based programs as well as



COVID relief programs. In 2020 there were a total of 96,353 such cards with a total load of \$38,236,524 and in 2021 158,536 such cards with a total load of \$134,209,224. Second, the Bank is de-emphasizing CRE loans, and of lending in general, as the primary revenue driver of the Bank. Third, there are several multi-branch financial institutions in the assessment area which are focused on community banking, creating a very competitive retail banking environment in the Bank's assessment area that causes traditional community bank profitability to be very difficult to attain. The Bank has been shifting from primarily offering products through traditional brick and mortar channels, to alternative technology based channels, better aligning with customer preferences and resulting in increased profitability to the Bank. Therefore, the lending test is no longer the best way to evaluate the Bank for CRA in its assessment area. The chart in Appendix A, including Call Report data (Schedule RC-C Parts I and II), demonstrates the decreases in lending at the Bank since 2011. Instead, banks are allowed an alternative to the lending test by developing and implementing an approved strategic plan which the Bank has elected to do.

**a. Goals**

The Bank plans to meet its CRA obligations to the low and moderate income and small business community through investments/loans, service hours and grants as spelled out in section E of this document: CRA Strategic Plan Performance Goals 2023 through 2026.

**b. Effective Date and Term**

The Bank would like to obtain approval for the revised strategic plan from the OCC and begin implementation of the plan starting January 1, 2023. The Bank is already under a current strategic plan that was approved for 2019-2022. The plan will be managed by the Bank's management with oversight by the Board of Directors. Any material changes to the Bank or business environment that would require changes in the plan, will necessitate OCC review and approval before any such modification could take place.

The Bank plans to operate under this strategic plan and be evaluated under this strategic plan for the time period of 2023 through 2026, after which the Bank may develop a new strategic plan.

**D. First Century Bank's Assessment Area**

The Bank's CRA Assessment Area for 2023 is defined as Jackson County, Georgia which is not in an MSA and Beaufort County, South Carolina, due to the opening of a new branch in Hilton Head Island in December of 2020. The Hall County branch closed in September 2020.

### **Information on Jackson County**

The 2010 census shows that the population of Jackson County was 60,485 and for 2020 was 75,907 (an increase of 15,422 or 25.5%). The 2010 Census (2020 census details are not yet available as of March 2022) indicates the 60,485 population is comprised of 15,870 families and 20,917 households and that 8,930 (14.77%) of these live below the poverty line and according to the U.S. Census Bureau 2020 American Community Survey estimates, still 9.3% of the population in Jackson County lives below the poverty line. For 2021 FFIEC estimated median family income is \$53,400. (see charts below)

FFIEC Census Reports (see below charts) indicate that there are a total of 23,756 housing units in Jackson County. Of these, 16,202 (68.20%) are owner occupied, 4,846 (20.40%) are renter occupied, and 2,708 (11.40%) are vacant (see charts below). 2010 FFIEC Census Reports showed 69.54% owner occupied, 23.26% renter occupied and 7.20% vacant. According to city-data.com, new house construction building permits have gone from 82 in 2010 at an average cost of \$172,600 to 1,018 in 2019 at an average cost of \$194,800 a 12.86% increase in cost over the period, lower than average weekly wage growth between 2010 and 2021 of 29.31%. As demonstrated by the numbers, there would be few, if any, developments that would be in the affordable range for the LMI population. It is worthwhile to note that the majority of this activity has been in the Western part of the county in an area greater than 10 miles from the Bank's location.

According to the Georgia Department of Labor Area Labor Profile for Jackson County, unemployment has gone from 10.8% in 2010 to 5.9% in 2020. Additionally, the industry mix has shifted somewhat during that span. In 2010 goods producing industry accounted for 29.1% of employment, service producing 52.4%, government sector 18.4% and unclassified at .2%. In 2021 the mix had changed to 20.6% goods producing (351 businesses), 70.3% service providing (1,217 businesses), 8.9% government sector (58 entities) and .2% unclassified (120 businesses). Of the total 1,746 businesses noted in the 2021 Georgia Area Labor Profile, the top 10 employers in Jackson County were:

- Amazon.com Services, Inc.
- Bed Bath and Beyond, Inc.
- Fox Racing Shox
- HG Georgia Merchants, Inc.
- Hire Dynamics, LLC
- Kubota Industrial Equipment
- TD Automotive Compressor Georgia, LLC
- The William Carter Company
- Wayne Poultry
- Williams-Sonoma Direct, Inc.



Average weekly wages during this time frame went from \$638 per week to \$825 per week, a 29.31% increase but still below the Georgia average of \$1,156 per week.

Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian / Pacific Islander Population	Black Population	Hispanic Population	Other Population/ Two or More Races
101.01	5461	4.12	1414	2070	5236	225	0	59	149	15	2
101.02	6949	12.2	1808	2124	6101	848	5	134	119	416	174
101.03	5442	17.49	1404	1853	4490	952	0	103	228	510	111
102	4988	15.48	1197	1673	4216	772	0	338	131	267	36
103	4488	34.29	1091	1442	2949	1539	26	25	767	640	81
104	4712	17.64	1374	1801	3881	831	25	66	335	137	268
105	5280	17.25	1335	1762	4369	911	0	36	198	635	42
106	8787	22.02	2489	2940	6852	1935	7	45	1061	737	85
107.01	2234	15.98	516	789	1877	357	0	18	324	15	0
107.02	9737	16.77	2618	3532	8104	1633	0	319	648	520	146
107.03	3342	19.42	908	1062	2693	649	0	0	383	234	32
Total s	61,420		16,154	21,048	50,768	10,652	63	1,143	4,343	4,126	977

Source: FFIEC Census Reports

Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
101.01	Upper	\$45,886	\$53,400	9.87	151.98	\$69,740	\$81,157	\$58,654
101.02	Upper	\$45,886	\$53,400	3.73	190.38	\$87,361	\$101,663	\$80,814
101.03	Upper	\$45,886	\$53,400	13.8	130.41	\$59,844	\$69,639	\$57,767
102.00	Middle	\$45,886	\$53,400	19.59	99.12	\$45,486	\$52,930	\$41,118
103.00	Middle	\$45,886	\$53,400	21.61	97.51	\$44,744	\$52,070	\$42,090
104.00	Middle	\$45,886	\$53,400	18.55	108.28	\$49,688	\$57,822	\$42,266
105.00	Upper	\$45,886	\$53,400	18.41	145.02	\$66,544	\$77,441	\$53,654
106.00	Upper	\$45,886	\$53,400	18.88	131.06	\$60,139	\$69,986	\$51,218
107.01	Upper	\$45,886	\$53,400	5.93	126.17	\$57,895	\$67,375	\$42,404
107.02	Upper	\$45,886	\$53,400	11.55	140.56	\$64,500	\$75,059	\$55,440
107.03	Upper	\$45,886	\$53,400	3.86	170.78	\$78,368	\$91,197	\$73,636

Source: FFIEC Census Reports



Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
101.01	2238	2238	18	No	1656	168	1656	414
101.02	2198	2149	14	No	1882	74	1882	242
101.03	2060	2060	15	No	1495	207	1495	358
102.00	1874	1833	27	No	1307	201	1307	366
103.00	1862	1505	35	No	834	420	834	608
104.00	1934	1791	29	No	1120	133	1120	681
105.00	2209	2195	22	No	1520	447	1520	242
106.00	3533	3462	22	No	2220	593	2220	720
107.01	873	829	17	No	579	84	579	210
107.02	3803	3637	14	No	2635	271	2635	897
107.03	1172	1172	13	No	954	110	954	108
Totals	23,756	22,871			16,202	2,708	16,202	4,846

Source: FFIEC Census Reports

Jackson County is made up of 11 census tracts, none of which are defined as low or moderate income tracts. (see charts below)

Census Tract Income Level	Number of Tracts	Percentage of Tracts
Low	0	0.00%
Moderate	0	0.00%
Middle	3	27.27%
Upper	8	72.73%
<b>TOTALS</b>	<b>11</b>	<b>100.00%</b>

Due to the growth in new businesses moving to Jackson County, this situation is not expected to change during the planning horizon. The expectation is that the economic growth will create a situation where the upper and middle continue to increase and the low to moderate will remain at their present non-existent status.



Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
101.01	Upper	No	151.98	\$53,400	\$81,157	\$69,740	5461	4.12	225	1656	2238
101.02	Upper	No	190.38	\$53,400	\$101,663	\$87,361	6949	12.2	848	1882	2149
101.03	Upper	No	130.41	\$53,400	\$69,639	\$59,844	5442	17.49	952	1495	2060
102	Middle	No	99.12	\$53,400	\$52,930	\$45,486	4988	15.48	772	1307	1833
103	Middle	No	97.51	\$53,400	\$52,070	\$44,744	4488	34.29	1539	834	1505
104	Middle	No	108.28	\$53,400	\$57,822	\$49,688	4712	17.64	831	1120	1791
105	Upper	No	145.02	\$53,400	\$77,441	\$66,544	5280	17.25	911	1520	2195
106	Upper	No	131.06	\$53,400	\$69,986	\$60,139	8787	22.02	1935	2220	3462
107.01	Upper	No	126.17	\$53,400	\$67,375	\$57,895	2234	15.98	357	579	829
107.02	Upper	No	140.56	\$53,400	\$75,059	\$64,500	9737	16.77	1633	2635	3637
107.03	Upper	No	170.78	\$53,400	\$91,197	\$78,368	3342	19.42	649	954	1172
Totals							61,420		10,652	16,202	22,871

Source: FFIEC Census Reports

#### Information on Beaufort County, SC

The 2010 census shows that the population of Beaufort County is 162,233 and for 2020 was 187,117 (an increase of 24,884 or 15.3%). The 2010 Census (2020 census details are not yet available as of March 2022) indicates the 162,233 population is comprised of 70,607 households that 10.9% of the population live below the poverty line and according to the U.S. Census Bureau 2016-2020 American Community Survey 5 year estimates, 9.3% of the population in Beaufort County lives below the poverty line. For 2021 FFIEC estimated median family income is \$73,200. (see below charts)

FFIEC Census Reports (see below charts) indicate that there are a total of 92,858 housing units in Beaufort County. Of these, 46,204 (49.23%) are owner occupied, 19,771 (21.06%) are renter occupied, and 27,883 (29.71%) are vacant (see charts below). According to city-data.com, new house construction building permits have gone from 244 in 2010 at an average cost of \$377,400 to 1,771 in 2019 at an average cost of 379,100 a .45% increase in cost over the period. Between 2015 (the farthest back data located) and 2020 average weekly wages for Beaufort County increased by about 20.4% based on reports in the Bureau of Labor Statistics and the Beaufort County Profile respectively for those years.

Unemployment has gone from 8.7% in 2010 (SC Association of Counties data) to 3.3% in January of 2022 (Beaufort County Profile Rev. 3-14-22). The May 2020 Bureau of Labor Statistics (BLS.gov) indicate that the average weekly wages in Beaufort County were \$844.80 per week as compared to \$888.80 per week for all of South Carolina. As reported in the Beaufort County Community Profile (Rev. 3-14-22), over 87% of workers in Beaufort County work in one of the top 10 industries in the county, which are:

- Accommodation and Food Services
- Retail Trade
- Healthcare and Social Assistance
- Administrative and Support and Waste Management Remediation Services
- Educational Services
- Construction
- Professional, Scientific and Technical Services
- Other Services
- Public Administration
- Arts, Entertainment and Recreation

According to the Beaufort County Community Profile (Rev. 3-14-22), the top 20 employers in Beaufort County were (listed alphabetically):

- Atlantic Personnel Inc.
- Beaufort County School District
- Beaufort Memorial Hospital
- Carecore National LLC
- County of Beaufort
- Department of Defense
- Food Lion
- Gregory M Parker Inc.
- Hargray Communications Group Inc.
- Lowes Home Centers Inc.
- Marine Corps Community Services
- Marriott Resorts Hospitality Corp.
- Montage Palmetto Bluff
- Publix Supermarkets Inc.
- Sea Pines Resort LLC
- Sitel Operating Corporation
- Tenet Physician Services of Hilton Head
- The Greenery Inc.
- The Kroger Company
- Wal-Mart Associates Inc.



Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/Hawaiian/Pacific Islander Population	Black Population	Hispanic Population	Other Population/Two or More Races
0001.00	4702	73.84	997	1752	1230	3472	0	0	3247	166	59
0002.00	4754	59.84	1081	1628	1909	2845	0	0	2781	64	0
0003.00	5069	31.45	1347	1502	3475	1594	68	62	796	540	128
0004.00	675	45.48	16	24	368	307	0	9	113	166	19
0005.01	6195	54.14	1668	2394	2841	3354	0	117	2172	806	259
0005.02	5525	46.84	1463	2064	2937	2588	0	0	1720	606	262
0005.03	5289	47.42	1363	1829	2781	2508	0	51	1939	481	37
0006.00	2499	30.85	622	958	1728	771	0	0	672	49	56
0007.00	5746	37.37	1289	2194	3599	2147	0	51	1059	836	201
0008.00	5310	47.72	1222	2204	2776	2534	44	156	1926	206	202
0009.01	2883	31.95	843	1096	1962	921	0	129	440	339	13
0009.02	8097	19.58	2147	2873	6512	1585	0	81	1165	265	74
0009.03	1852	37.85	498	649	1151	701	0	26	484	162	29
0010.00	4484	36.82	225	225	2833	1651	28	140	389	825	269
0011.01	3614	43.58	1131	1543	2039	1575	0	2	1516	5	52
0011.02	5831	80.11	1132	1960	1160	4671	0	0	3906	404	361
0012.00	944	4.24	364	498	904	40	0	0	0	32	8
0021.01	599	1.34	204	215	591	8	8	0	0	0	0
0021.02	1834	24.1	558	692	1392	442	71	4	82	285	0
0021.03	3692	25.95	904	1292	2734	958	0	127	393	416	22
0021.04	12547	4.42	4079	6419	11993	554	0	69	202	137	146
0021.05	3146	19.33	801	1138	2538	608	0	22	343	162	81
0021.06	9043	33.76	2399	3094	5990	3053	0	225	1372	1098	358
0021.07	11260	49.28	2510	3793	5711	5549	0	16	946	4548	39
0021.08	4863	41.95	1078	1620	2823	2040	0	254	455	1278	53
0022.01	7602	9.98	2426	3447	6843	759	43	112	339	251	14
0022.02	3346	6.66	1157	1458	3123	223	0	8	127	57	31
0101.00	1742	1.26	616	947	1720	22	8	0	0	5	9
0102.00	3888	18.52	1157	1703	3168	720	0	0	149	571	0
0103.00	4507	12.23	1245	2095	3956	551	0	64	11	331	145
0104.00	4844	14.62	1311	2124	4136	708	0	87	510	111	0
0105.00	4036	47.52	921	1501	2118	1918	28	28	722	1047	93
0106.00	4130	5.71	1459	1965	3894	236	0	124	24	65	23
0107.00	4682	3.84	1545	2160	4502	180	0	0	152	28	0
0108.00	4024	82.03	771	1199	723	3301	0	43	845	2391	22
0109.00	1745	12.44	605	832	1528	217	0	11	41	165	0
0110.00	2052	45.52	460	775	1118	934	3	52	527	352	0
0111.00	2350	13.79	776	1058	2026	324	0	0	35	289	0
0112.00	789	2.79	222	403	767	22	0	0	0	10	12



0113.00	1230	9,67	299	652	1111	119	5	0	0	114	0
9901.00	0	0	0	0	0	0	0	0	0	0	0
TOTALS	171,420		44,911	65,975	114,710	56,710	306	2,070	31,600	19,657	3,077

Source: FFIEC Census Reports

Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est Tract Median Family Income	2015 Tract Median Household Income
0001.00	Moderate	\$63,345	\$73,200	26.44	65.73	\$41,642	\$48,114	\$33,818
0002.00	Moderate	\$63,345	\$73,200	31.48	63.05	\$39,943	\$46,153	\$34,222
0003.00	Moderate	\$63,345	\$73,200	11.43	59.4	\$37,633	\$43,481	\$37,243
0004.00	Moderate	\$63,345	\$73,200	0	61.17	\$38,750	\$44,776	\$29,375
0005.01	Moderate	\$63,345	\$73,200	17.15	79.29	\$50,227	\$58,040	\$47,950
0005.02	Middle	\$63,345	\$73,200	18.57	81.15	\$51,406	\$59,402	\$48,125
0005.03	Middle	\$63,345	\$73,200	18.89	98.3	\$62,270	\$71,956	\$57,926
0006.00	Moderate	\$63,345	\$73,200	23.97	73.67	\$46,667	\$53,926	\$37,262
0007.00	Middle	\$63,345	\$73,200	15.27	97.89	\$62,013	\$71,655	\$47,955
0008.00	Moderate	\$63,345	\$73,200	18.82	60.22	\$38,152	\$44,081	\$38,532
0009.01	Upper	\$63,345	\$73,200	7.6	148.46	\$94,046	\$108,673	\$73,167
0009.02	Middle	\$63,345	\$73,200	11.8	101.22	\$64,124	\$74,093	\$57,265
0009.03	Middle	\$63,345	\$73,200	17.87	114.18	\$72,328	\$83,580	\$69,583
0010.00	Moderate	\$63,345	\$73,200	2.83	71.23	\$45,125	\$52,140	\$45,125
0011.01	Middle	\$63,345	\$73,200	9.1	110.64	\$70,088	\$80,988	\$59,538
0011.02	Moderate	\$63,345	\$73,200	24.94	65.54	\$41,522	\$47,975	\$32,210
0012.00	Upper	\$63,345	\$73,200	2.97	156.87	\$99,375	\$114,829	\$80,577
0021.01	Upper	\$63,345	\$73,200	37.23	132.6	\$84,000	\$97,063	\$85,583
0021.02	Middle	\$63,345	\$73,200	8.23	89.55	\$56,731	\$65,551	\$52,368
0021.03	Middle	\$63,345	\$73,200	2.47	114.27	\$72,388	\$83,646	\$70,084
0021.04	Middle	\$63,345	\$73,200	6.33	106.39	\$67,395	\$77,877	\$61,179
0021.05	Middle	\$63,345	\$73,200	6.78	114.35	\$72,436	\$83,704	\$65,396
0021.06	Middle	\$63,345	\$73,200	9.81	104.76	\$66,366	\$76,684	\$66,061
0021.07	Middle	\$63,345	\$73,200	14.64	94.86	\$60,090	\$69,438	\$56,208
0021.08	Middle	\$63,345	\$73,200	13.43	88.04	\$55,772	\$64,445	\$54,853
0022.01	Upper	\$63,345	\$73,200	4.72	155.64	\$98,533	\$113,855	\$79,865
0022.02	Upper	\$63,345	\$73,200	2.54	152.82	\$96,806	\$111,864	\$86,063
0101.00	Upper	\$63,345	\$73,200	5.46	162.9	\$103,194	\$119,243	\$90,224
0102.00	Upper	\$63,345	\$73,200	5.53	174.54	\$110,563	\$127,763	\$81,125
0103.00	Middle	\$63,345	\$73,200	3.98	112.8	\$71,455	\$82,570	\$60,229
0104.00	Upper	\$63,345	\$73,200	5.9	159.73	\$101,181	\$116,922	\$67,872



0105.00	Middle	\$63,345	\$73,200	18.48	96.75	\$61,289	\$70,821	\$47,058
0106.00	Upper	\$63,345	\$73,200	3.26	168.47	\$106,719	\$123,320	\$85,491
0107.00	Upper	\$63,345	\$73,200	5.49	152.3	\$96,477	\$111,484	\$85,872
0108.00	Moderate	\$63,345	\$73,200	33.75	63.94	\$40,506	\$46,804	\$35,744
0109.00	Upper	\$63,345	\$73,200	12.72	153.73	\$97,386	\$112,530	\$73,438
0110.00	Moderate	\$63,345	\$73,200	12.18	69.49	\$44,024	\$50,867	\$43,873
0111.00	Upper	\$63,345	\$73,200	7.19	145.87	\$92,404	\$106,777	\$76,286
0112.00	Upper	\$63,345	\$73,200	8.49	124.71	\$79,000	\$91,288	\$81,055
0113.00	Middle	\$63,345	\$73,200	5.93	92.29	\$58,466	\$67,556	\$49,911
9901.00	Unknown	\$63,345	\$73,200	0	0	\$0	\$0	\$0

Source: FFIEC Census Reports

Tract Code	Total Housing Units	1- to 4- Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
0001.00	2224	2210	27	No	1438	472	1438	314
0002.00	2109	2046	26	No	1131	481	1131	497
0003.00	1636	1627	36	No	230	134	230	1272
0004.00	96	96	51	No	4	72	4	20
5000.01	2769	2380	24	No	1337	375	1337	1057
0005.02	2456	1693	15	No	768	392	768	1296
0005.03	2129	2045	28	No	1265	300	1265	564
0006.00	1164	1129	57	No	449	206	444	509
0007.00	2812	2592	49	No	1532	618	1517	662
0008.00	2479	1515	27	No	859	275	799	1345
9000.01	1260	1260	19	No	962	164	962	134
0009.02	3480	3330	22	No	2125	607	2061	748
0009.03	742	738	24	No	459	93	459	190
0010.00	254	250	12	No	0	29	0	225
0011.01	2277	2262	21	No	1248	734	1241	295
0011.02	2678	2678	27	No	1568	718	1568	392
0012.00	2049	1603	27	No	474	1551	474	24
0021.01	544	539	14	No	165	329	160	50
0021.02	947	947	11	Yes	571	255	571	121
0021.03	1554	1554	11	Yes	1098	262	1098	194
0021.04	7017	6960	12	Yes	5932	598	5932	487
0021.05	1229	1007	0	Yes	868	91	737	270
0021.06	3599	3399	11	Yes	2133	505	2133	961



0021.07	4070	2671	14	Yes	2033	277	1815	1760
0021.08	2054	1585	22	Yes	934	434	926	686
0022.01	4026	3390	15	Yes	2580	579	2580	867
0022.02	1943	1801	14	No	1192	485	1192	266
0101.00	3287	2270	36	Yes	852	2340	728	95
0102.00	3096	2513	34	Yes	1328	1393	1182	375
0103.00	3218	2074	28	Yes	1536	1123	1250	559
0104.00	2709	2012	13	Yes	1649	585	1514	475
0105.00	1739	1575	22	Yes	977	238	927	524
0106.00	2423	2045	24	Yes	1854	458	1602	111
0107.00	2603	2389	25	Yes	1873	443	1805	287
0108.00	1525	711	31	Yes	323	326	245	876
0109.00	1353	1079	28	Yes	659	521	651	173
0110.00	3331	923	30	Yes	490	2556	382	285
0111.00	4162	2553	30	Yes	743	3104	629	315
0112.00	1729	1039	31	Yes	287	1326	242	116
0113.00	3086	655	33	Yes	278	2434	173	374
9901.00	0	0	0	Yes	0	0	0	0
Totals	93,858	75,145			46,204	27,883	44,172	19,771

Source: FFIEC Census Reports

Beaufort County is made up of 41 census tracts, none of which are defined as low and 11 which are defined as moderate income tracts. 1 tract is designated as "unknown". (see charts below)

Census Tract Income Level	Number of Tracts	Percentage of Tracts
Low	0	0%
Moderate	11	26.83%
Middle	16	39.02%
Upper	13	31.71%
Unknown	1	2.44%
<b>TOTALS</b>	<b>41</b>	<b>100.00%</b>

Tract Code	Tract Income Level	Distressed or Under-served Tract	Tract Median Family Income %	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
0001.00	Moderate	No	65.73	\$73,200	\$48,114	\$41,642	4702	73.84	3472	1438	2210
0002.00	Moderate	No	63.05	\$73,200	\$46,153	\$39,943	4754	59.84	2845	1131	2046



0003.0 0	Moderate	No	59.4	\$73,200	\$43,481	\$37,633	5069	31.45	1594	230	1627
0004.0 0	Moderate	No	61.17	\$73,200	\$44,776	\$38,750	675	45.48	307	4	96
0005.0 1	Moderate	No	79.29	\$73,200	\$58,040	\$50,227	6195	54.14	3354	1337	2380
0005.0 2	Middle	No	81.15	\$73,200	\$59,402	\$51,406	5525	46.84	2588	768	1693
0005.0 3	Middle	No	98.3	\$73,200	\$71,956	\$62,270	5289	47.42	2508	1265	2045
0006.0 0	Moderate	No	73.67	\$73,200	\$53,926	\$46,667	2499	30.85	771	449	1129
0007.0 0	Middle	No	97.89	\$73,200	\$71,655	\$62,013	5746	37.37	2147	1532	2592
0008.0 0	Moderate	No	60.22	\$73,200	\$44,081	\$38,152	5310	47.72	2534	859	1515
0009.0 1	Upper	No	148.46	\$73,200	\$108,673	\$94,046	2883	31.95	921	962	1260
0009.0 2	Middle	No	101.22	\$73,200	\$74,093	\$64,124	8097	19.58	1585	2125	3330
0009.0 3	Middle	No	114.18	\$73,200	\$83,580	\$72,328	1852	37.85	701	459	738
0010.0 0	Moderate	No	71.23	\$73,200	\$52,140	\$45,125	4484	36.82	1651	0	250
0011.0 1	Middle	No	110.64	\$73,200	\$80,988	\$70,088	3614	43.58	1575	1248	2262
0011.0 2	Moderate	No	65.54	\$73,200	\$47,975	\$41,522	5831	80.11	4671	1568	2678
0012.0 0	Upper	No	156.87	\$73,200	\$114,829	\$99,375	944	4.24	40	474	1603
0021.0 1	Upper	No	132.6	\$73,200	\$97,063	\$84,000	599	1.34	8	165	539
0021.0 2	Middle	No	89.55	\$73,200	\$65,551	\$56,731	1834	24.1	442	571	947
0021.0 3	Middle	No	114.27	\$73,200	\$83,646	\$72,388	3692	25.95	958	1098	1554
0021.0 4	Middle	No	106.39	\$73,200	\$77,877	\$67,395	12547	4.42	554	5932	6960
0021.0 5	Middle	No	114.35	\$73,200	\$83,704	\$72,436	3146	19.33	608	868	1007
0021.0 6	Middle	No	104.76	\$73,200	\$76,684	\$66,366	9043	33.76	3053	2133	3399
0021.0 7	Middle	No	94.86	\$73,200	\$69,438	\$60,090	11260	49.28	5549	2033	2671
0021.0 8	Middle	No	88.04	\$73,200	\$64,445	\$55,772	4863	41.95	2040	934	1585
0022.0 1	Upper	No	155.54	\$73,200	\$113,855	\$98,533	7602	9.98	759	2580	3390
0022.0 2	Upper	No	152.82	\$73,200	\$111,864	\$96,806	3346	6.66	223	1192	1801
0101.0 0	Upper	No	162.9	\$73,200	\$119,243	\$103,194	1742	1.26	22	852	2270
0102.0 0	Upper	No	174.54	\$73,200	\$127,763	\$110,563	3888	18.52	720	1328	2513
0103.0 0	Middle	No	112.8	\$73,200	\$82,570	\$71,455	4507	12.23	551	1536	2074



0104.00	Upper	No	159.73	\$73,200	\$116,922	\$101,181	4844	14.62	708	1649	2012
0105.00	Middle	No	96.75	\$73,200	\$70,821	\$61,289	4036	47.52	1918	977	1575
0106.00	Upper	No	168.47	\$73,200	\$123,320	\$106,719	4130	5.71	236	1854	2045
0107.00	Upper	No	152.3	\$73,200	\$111,484	\$96,477	4682	3.84	180	1873	2389
0108.00	Moderate	No	63.94	\$73,200	\$46,804	\$40,506	4024	82.03	3301	323	711
0109.00	Upper	No	153.73	\$73,200	\$112,530	\$97,386	1745	12.44	217	659	1079
0110.00	Moderate	No	69.49	\$73,200	\$50,867	\$44,024	2052	45.52	934	490	923
0111.00	Upper	No	145.87	\$73,200	\$106,777	\$92,404	2350	13.79	324	743	2553
0112.00	Upper	No	124.71	\$73,200	\$91,288	\$79,000	789	2.79	22	287	1039
0113.00	Middle	No	92.29	\$73,200	\$67,556	\$58,466	1230	9.67	119	278	655
9901.00	Unknown	No	0	\$73,200	\$0	\$0	0	0	0	0	0
Totals							171,420		56,710	46,204	75,145

Source: FFIEC Census Reports

## E. CRA Strategic Plan Performance Goals for 2023 through 2026

### Qualified Community Investment Goals

During the course of the Bank's previous CRA Strategic Plan, the Bank worked with many of the below entities based on the input the Bank received from the community and plans to continue to work with many of these ongoing. The Bank continues to focus its efforts on certain community investment goals. The Bank will also look for and be open to bringing other organizations into the plan as the program matures.

Beaufort County School System – See below table detailing information from the State of South Carolina as of May 2022 (most recent data available). Overall more than 50% of the students in the school system qualify for the Free and Reduced School Lunch Program.

District	SchoolName	% Free & Reduced
Beaufort 01	Battery Creek High School	53.86%
Beaufort 01	Beaufort Elementary School	100%
Beaufort 01	Beaufort High School	39.88%
Beaufort 01	Beaufort Middle School	65.87%
Beaufort 01	Bluffton Elementary School	36.95%
Beaufort 01	Bluffton High School	33.52%

Beaufort 01	Bluffton Middle School (BLMS)	46.38%
Beaufort 01	Broad River Elementary School	100%
Beaufort 01	Coosa Elementary School	26.37%
Beaufort 01	H. E. McCracken Middle School	30.12%
Beaufort 01	Hilton Head Island Early Childhood Center (HHECC)	56.38%
Beaufort 01	Hilton Head Island School for Creative Arts (HHSCA)	61.65%
Beaufort 01	Hilton Head Elementary School, Authorized IB School	58.09%
Beaufort 01	Hilton Head Island High School (HHHS)	33.28%
Beaufort 01	Hilton Head Island Middle School	50.48%
Beaufort 01	Joseph S. Shanklin Elementary School (SES)	100%
Beaufort 01	Lady's Island Middle School	59.07%
Beaufort 01	Ladys Island Elementary Sch	100%
Beaufort 01	May River High School	21.57%
Beaufort 01	M.C. Riley Elementary School	44.70%
Beaufort 01	Mossy Oaks Elementary School	100%
Beaufort 01	Okatie Elementary School	31.62%
Beaufort 01	Port Royal Elementary School	100%
Beaufort 01	Pritchardville Elementary School (PES)	24.12%
Beaufort 01	Red Cedar Elementary (RCES)	44.99%
Beaufort 01	Bluffton Early	32.35%
Beaufort 01	River Ridge Academy	20.80%
Beaufort 01	M.C. Riley Early	46.25%
Beaufort 01	Robert Smalls International Academy	100%
Beaufort 01	Saint Helena Elementary School	100%
Beaufort 01	Whale Branch Early College High School	100%
Beaufort 01	Whale Branch Elementary School	100%
Beaufort 01	Whale Branch Middle School	100%
System Total		50.25%

Junior Achievement – Junior Achievement (“JA”) provides financial education to students across all grade levels in Beaufort County. Based on the statistics above, providing financial education in the school systems provides benefit to the low and moderate income community as over 50% of all students in all schools are on the free and reduced lunch program. The Bank has worked with JA and in several instances has funded and/or provided volunteers to provide much needed financial education to students that they would otherwise likely not receive.

Boys and Girls Club – Frequently over 50% of the participants in Boys and Girls club after school programs qualify for the Free and Reduced School Lunch Program at their school. Boys and Girls Club of Commerce shows that approximately 90% of the current 130 participants in their after school programs qualify for the National School Lunch Program at their school. The Bank intends to continue to work with the Boys and Girls Club to assist in delivering their financial education program for young people.



Habitat for Humanity of Commerce – Habitat’s services are specifically directed towards helping low and moderate income individuals. Habitat in Commerce builds 1-2 homes per year for LMI individuals or families. By policy their applicants must earn between 30% and 60% of the area’s median income, clearly placing them in the Low to Moderate Income bracket for the area. As evidence of this, Habitat reported that for the most recent three families in the program, the incomes were 53%, 54.3% and 41.3% of Area Median Income (AMI). The Bank intends to continue to work with Habitat in providing a financial education program to its clientele as well as to examine other opportunities to assist Habitat in fulfilling their mission such as participation on various committees and assisting with program funding needs such as the new home construction and home repair programs. Additionally, a member of the Bank’s management team serves on the Finance Committee of Habitat for Humanity of Commerce.

Hilton Head Regional Habitat for Humanity- Again, Habitat’s services are specifically directed towards helping low and moderate income (“LMI”) individuals. Habitat in the Hilton Head area builds 4-6 homes per year for LMI individuals and families.

Although not a qualified CRA activity under current regulations, the Bank also provides volunteers to the Banks-Jackson Food Bank, helping to unload the trucks, load the freezers, prepare food for distribution and distribution of food to recipients. Additionally, the Bank provides for the upkeep of the property on which the Banks-Jackson Food Bank sits.

The Bank plans to continue to follow the same sorts of goal established in the Bank’s earlier CRA Strategic Plans. The Bank has taken into account the Bank’s business focus, lending limitations, and CRA opportunities in the county, as well as meaningful input from community leaders on how the Bank can best help meet the needs of the assessment area in terms of low and moderate income individuals and families and small businesses, while continuing to operate the Bank in a safe and sound manner.

For 2023-2026, the Bank is setting specific goals for each assessment area in each of the three goal categories: Lending/Investment Goals, Grants/Donations Goals and Service Hour Goals. For Lending/Investment Goals it is expected goals will be achieved primarily through investments that are applicable regionally or statewide. For Grant/Donations and Service Hour goals, there will be goals related to the specific assessment areas (Jackson and Beaufort Counties). An overall goal for each category will be established at the overall Bank level and then sub-goals for each of the respective assessment areas. For the Lending/Investment assessment area level goals, goals will be established for each assessment area based on a percentage of the estimated deposits percent for the two assessment areas of the Bank. For Grants/Donations goals for the assessment areas, the Bank will establish goals in line with goals established in the previous plan and increase those annually dependent upon the growth of the average assets of the Bank. For service hours goals, these will be determined by examining the appropriate staff available in the assessment area for the opportunities available.



### **Lending/Investment Goals**

In light of the Bank's limited lending opportunities, the Bank will employ a combined Lending/Investment goal based on a percentage of average assets. The Bank intends to meet this goal through investments/loans that demonstrate a primary purpose of assistance to low and moderate income individuals, small businesses or community development. Given the relatively small size of the assessment area, the Bank intends to pursue investment opportunities with statewide or regional impact. Investments will be made that revitalize and stabilize an underserved nonmetropolitan middle-income geography if they help to meet essential community needs, including need of low or moderate income individuals. Activities such as financing for the construction, expansion, improvement, maintenance, or operation of essential infrastructure or facilities for health services, education, public safety, public services, industrial parks, affordable housing, or communication services. Additionally, the Bank will look to make investments in or place deposits with Minority/Woman Owned Depository Institutions (MDI) or Community Development Financial Institutions (CDFI). Investment/Lending goal for the respective assessment areas will be determined based on actual percentage of deposits for the Bank from each assessment area as of June 30 of the prior year. Projected percentage of deposits as of June 30 for 2022 are expected to be 97.2% for Jackson County, Georgia and 2.8% for Beaufort County, South Carolina and in 2023 percentages are projected to be 93.5% and 6.4% respectively, in 2024 percentages are projected to be 87.7% and 12.2% respectively and in 2025 82.8% and 17.2% respectively. Specific Lending/Investment goals and Grants/Donations goals below for the specific assessment areas are based on the above stated projected percentages of deposits for each assessment area. However, actual assessment area goals will be adjusted each year based on actual percentages of deposits as of June 30 of the prior year. The overall Bank goals will not change, just the amounts applicable to the different assessment areas.

### **Overall FCB Goal (Goals by assessment area are below based on methodology described above)**

<b>Satisfactory</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	0.75%	0.75%	0.75%	0.75%
<b>Outstanding</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	1.00%	1.00%	1.00%	1.00%

\*Percentage of Average Assets is defined as the average of the average assets reported in the Call Report at the quarter ends of the previous calendar year.

**Jackson County 2023-2026 Goals**

<b>Satisfactory</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	0.73%	0.70%	0.66%	0.62%
<b>Outstanding</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	0.97%	0.94%	0.88%	0.83%

\*Percentage of Average Assets is defined as the average of the average assets reported in the Call Report at the quarter ends of the previous calendar year.

**Beaufort County 2023-2026 Goals**

<b>Satisfactory</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	0.02%	0.05%	0.09%	0.13%
<b>Outstanding</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Loans/Investments as a Percentage of Average Assets*	0.03%	0.06%	0.12%	0.17%

\*Percentage of Average Assets is defined as the average of the average assets reported in the Call Report at the quarter ends of the previous calendar year.

**Grants and Donations Goals**

Additionally, the Bank will meet its community investment goals through a combination of grants and donations to qualified organizations that serve the Bank's assessment area, Jackson County, Georgia and Beaufort County, South Carolina. Annual increases in Grants/Donations will be determined by the growth of the Bank in terms of average assets. If average assets grow from 0-5% the goal of the previous year will remain the same for the current year. If average assets grow greater than 5% up to 10%, the bank will increase the Grant/Donation goal for each assessment area by \$2,500 over the prior year. And if the Bank's average assets grow greater than 10%, the Bank will increase the Grant/Donation goal for each assessment area by \$4,000 over the prior year. Below are the goals established for the defined assessment period. The tables below reflect what the goals would be assuming the Bank's average assets grow over 5% and up to 10% each year.

#### Jackson County Goals

Satisfactory	2023	2024	2025	2026
Amount of grants/donations per year	\$45,000	\$47,500	\$50,000	\$52,500
Outstanding	2023	2024	2025	2026
Amount of grants/donations per year	\$50,000	\$52,500	\$55,000	\$57,500

The goals for outstanding represent significant increases over the Satisfactory goals, and more so in the early stages as the Bank ramps up efforts. The Outstanding goals for 2023, 2024, 2025 and 2026 are higher than the Satisfactory goals by 11.11%, 10.53% 10% and 9.52% respectively.

Goals for the Beaufort County, South Carolina assessment area (Hilton Head Island Branch opened in December 2020) are listed below and take into account the fact that the assessment area is relatively new to the Bank and the Bank's presence is smaller than in Jackson County.

#### Beaufort County Goals

Satisfactory	2023	2024	2025	2026
Amount of grants/donations per year	\$15,000	\$17,500	\$20,000	\$22,500
Outstanding	2023	2024	2025	2026
Amount of grants/donations per year	\$20,000	\$22,500	\$25,000	\$27,500

The goals for outstanding represent significant increases over the Satisfactory goals, and more so in the early stages as the Bank ramps up efforts. The Outstanding goals for 2023, 2024, 2025 and 2026 are higher than the Satisfactory goals by 33.33%, 28.57%, 25% and 22.22% respectively.

The Bank will actively seek to identify organizations that provide assistance, benefits or services to low and moderate income families in Jackson County, Georgia and Beaufort County, South Carolina and/or organizations providing assistance related to affordable housing in Jackson County, Georgia and Beaufort County, South Carolina.

In establishing the Grants/Donations goal, FCB took into account information received during its discussions with the community regarding various programs and potential associated costs. FCB



has previously committed to funding various programs at Habitat for Humanity in Jackson County, Habitat for Humanity in Beaufort County and Junior Achievement in Beaufort County and the Bank anticipates continuing to work with these organizations.

### **Service Hours Goals**

The Bank will provide support to organizations that serve the community by encouraging and supporting volunteer efforts of its employees and Board of Directors to these organizations that serve the Bank's assessment area, Jackson County, Georgia and Beaufort County, South Carolina. In Jackson County, the Bank has engaged in providing financial education training to the low and moderate income community by holding financial education sessions with Habitat for Humanity families and has also volunteered by teaching financial education sessions at the Boys and Girls Club in Commerce. The Bank has also engaged in volunteer efforts with Habitat for Humanity and Junior Achievement in Beaufort County, South Carolina.

#### **Jackson County Goals**

<b>Satisfactory</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Hours of Service	50	50	50	50
<b>Outstanding</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Hours of Service	60	60	60	60

In establishing the service hours goals, the Bank took into account the number of Commerce based employees, those used to interacting with the public on the Bank's behalf, as well as the opportunities identified during discussions with community leaders noted below. Since most of our volunteer efforts tend to revolve around providing financial education, it is important that volunteers are comfortable in dealing with the public on the Bank's behalf. In evaluating opportunities, the Bank has also taken into account the affect that COVID has had on reducing the in-person volunteer opportunities that the Bank has previously participated in. FCB believes that the goals are appropriately aggressive relative to the opportunities in the area.

Additionally, the goals for outstanding are significant increases over the Satisfactory goals. The Outstanding goals for 2023, 2024, 2025 and 2026 are higher than the Satisfactory goals by 20%.

Goals for the Beaufort County, South Carolina assessment area (Hilton Head Island Branch opened in December 2020) are listed below. In establishing the service hours goals, the Bank took into account the number of Hilton Head Island based employees, those used to interacting with the public on the Bank's behalf, as well as the opportunities identified during discussions with community leaders noted below. Since many of our volunteer efforts tend to revolve around providing financial education, it is important that volunteers are comfortable in dealing with the public on the Bank's behalf. In evaluating opportunities, the Bank has also taken into account the



affect that COVID has had on reducing the in-person volunteer opportunities that the Bank has previously participated in. The Bank also took into account that the branch is new as of December 2020, and continues to require significant focus by employees to establish the branch. FCB believes that the goals are appropriately aggressive.

#### **Beaufort County Goals**

<b>Satisfactory</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Hours of Service	20	20	20	20
<b>Outstanding</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Hours of Service	30	30	30	30

Additionally, the goals for outstanding are significant increases over the Satisfactory goals. The Outstanding goals for 2023, 2024, 2025 and 2026 are higher than the Satisfactory goals by 50%.

#### **F. Public Participation in Development of the Plan**

The Bank has solicited input from the community through discussions with the following:

1. Jim Shaw, President and CEO, Jackson County Chamber of Commerce
2. John Scott, Director of Economic Development, Jackson County Chamber of Commerce
3. Anne Auer, Previous Executive Director, Jackson County Habitat for Humanity and diAna Kunz Huckins, current Executive Director
4. Stacey Ramsey, Director, Commerce Boys and Girls Club
5. Linda Foster, Executive Director, Jackson County Family Connection
6. Brenda Dooley, Executive Director, Hilton Head Regional Habitat for Humanity
7. Bill Miles, President, Hilton Head Island-Bluffton Chamber of Commerce
8. Kim Likins, Director, Boys and Girls Club of Hilton Head Island
9. Bette Bronson, VP of Education, Junior Achievement of Greater South Carolina
10. Susan Spencer, Development Director, Junior Achievement of Greater South Carolina

#### **G. Notice Regarding Public Inspection of the Plan**

The Bank solicited comments from the public by posting a notice in the Jackson Herald on June 29, 2022 and The Island Packet on June 24, 2022 and each of the following three weeks in each publication. The notices alerted the public to the creation of the plan and solicited public feedback. See Appendix B for the public notice.

## H. Election of Alternative Performance Evaluations

First Century Bank would elect to be evaluated under an alternative assessment method if it fails to achieve a Satisfactory rating under this strategic plan. It is the intent and expectation of management that First Century Bank will meet or exceed all goals established in this plan.

## I. Appendix A – Comparison of 2010 and 2022 Loan Balances – First Century Bank, N.A.

### First Century Bank Loan Concentration Ratios 3/31/2022

	March 31, 2022			
	Dollar Amount (000s)	% of Total Loans	% of Tier 1 Capital	% of Total Assets
1-4 family residential construction loans	3,046	9.03%	4.16%	0.78%
Other Construction loans and all land development and other land loans	7,038	20.88%	9.61%	1.80%
Secured by Farmland	-	0.00%	0.00%	0.00%
1-4 Family Residential - Revolving, open-end loans	332	0.98%	0.45%	0.09%
1-4 Family Residential - Closed-end loans	3,842	11.40%	5.24%	0.98%
Secured by Multifamily Dwellings	-	0.00%	0.00%	0.00%
Nonfarm/Nonresidential properties - Owner Occupied	-	0.00%	0.00%	0.00%
Nonfarm/Nonresidential properties - Non Owner Occupied	2,457	7.29%	3.35%	0.63%
Commercial and Industrial Loans	7,151	21.21%	9.76%	1.83%
Loans to Individuals - other revolving credit plans	88	0.26%	0.12%	0.02%
Loans to Individuals - other consumer loans	8,946	26.53%	12.21%	2.29%

Other Loans	845	2.51%	1.15%	0.22%
LESS: Unearned Fees	31	0.09%	0.04%	0.01%
<b>Total Loans</b>	<b>33,714</b>	<b>100.00%</b>		

<b>Tier 1 Capital</b>	73,268
<b>Total Assets</b>	390,533
<b>Total Deposits</b>	312,978
<b>Loans to Deposits Ratio</b>	11%

	December 31, 2010			
	Dollar Amount (000s)	% of Total Loans	% of Tier 2 Capital	% of Total Assets
1-4 family residential construction loans	996	2.17%	14.67%	1.38%
Other Construction loans and all land development and other land loans	4,167	9.10%	61.39%	5.78%
Secured by Farmland	1,175	2.56%	17.30%	1.63%
1-4 Family Residential - Revolving, open-end loans	2,110	4.61%	31.09%	2.93%
1-4 Family Residential - Closed-end loans	22,841	49.87%	336.47%	31.70%
Secured by Multifamily Dwellings	236	0.52%	3.48%	0.33%
Nonfarm/Nonresidential properties - Owner Occupied	8,556	18.68%	126.04%	11.88%
Nonfarm/Nonresidential properties - Non Owner Occupied	1,934	4.22%	28.49%	2.68%
Commercial and Industrial Loans	2,950	6.44%	43.46%	4.09%
Loans to Individuals - other revolving credit plans	17	0.04%	0.25%	0.02%
Loans to Individuals - other consumer loans	819	1.79%	12.07%	1.14%
Other Loans	2	0.00%	0.03%	0.00%
Unearned Fees	-	0.00%	0.00%	0.00%
<b>Total Loans</b>	<b>45,804</b>	<b>100.00%</b>		

<b>Tier 2 Capital</b>	6,788
<b>Total Assets</b>	72,051
<b>Total Deposits</b>	62,962
<b>Loans to Deposits Ratio</b>	73%



## Schedule RC-C—Loans and Lease Financing Receivables

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RC-6

## Part I. Loans and Leases

Do not deduct the allowance for loan and lease losses or the allocated transfer risk reserve from amounts reported in this schedule.<sup>1</sup>  
Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

	Dollar Amounts in Thousands	RCON	Amount	
1. Loans secured by real estate:				
a. Construction, land development, and other land loans:				
(1) 1-4 family residential construction loans.....	F158		3,046	1.a.1.
(2) Other construction loans and all land development and other land loans.....	F159		7,038	1.a.2.
b. Secured by farmland (including farm residential and other improvements).....	1420		0	1.b.
c. Secured by 1-4 family residential properties:				
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	1797		332	1.c.1.
(2) Closed-end loans secured by 1-4 family residential properties:				
(a) Secured by first liens.....	5367		3,842	1.c.2.a.
(b) Secured by junior liens.....	5368		0	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....	1460		0	1.d.
e. Secured by nonfarm nonresidential properties:				
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	F160		0	1.e.1.
(2) Loans secured by other nonfarm nonresidential properties.....	F161		2,457	1.e.2.
2. Loans to depository institutions and acceptances of other banks.....	1288		0	2.
3. Loans to finance agricultural production and other loans to farmers.....	1590		0	3.
4. Commercial and industrial loans.....	1766		7,151	4.
5. Not applicable				
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):				
a. Credit Cards.....	B538		0	6.a.
b. Other revolving credit plans.....	B539		88	6.b.
c. Automobile loans.....	K137		2	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans and all student loans).....	K207		8,944	6.d.
7. Not applicable				
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.....	2107		0	8.
9. Loans to nondepository financial institutions and other loans:				
a. Loans to nondepository financial institutions.....	J454		0	9.a.
b. Other loans.....	J464		845	9.b.
10. Lease financing receivables (net of unearned income).....	2165		0	10.
11. LESS: Any unearned income on loans reflected in items 1-9 above.....	2123		31	11.
12. Total loans and leases held for investment and held for sale (sum of items 1 through 10 minus item 11) (must equal Schedule RC, sum of items 4.a and 4.b).....	2122		33,714	12.

<sup>1</sup> Institutions that have adopted ASU 2016-13 should not deduct the allowance for credit losses on loans and leases or the allocated transfer risk reserve from amounts reported on this schedule.



## Schedule RC-C Part II - Loans to Small Businesses and Small Farms (Form Type - 051)

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:

(1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date. (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender. (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

### Dollar amounts in thousands

1. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2), and all or substantially all of the dollar volume of your bank's "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4, have original amounts of \$100,000 or less (if your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.")

If YES, complete items 2.a and 2.b below, skip items 3 and 4, and go to item 5. If NO and your bank has loans outstanding in either loan category, skip items 2.a and 2.b, complete items 3 and 4 below, and go to item 5. If NO and your bank has no loans outstanding in both loan categories, skip items 2 through 4, and go to item 5.

2. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:

- a. "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (Note: Sum of items 1.e.(1) and 1.e.(2) divided by the number of loans should NOT exceed \$100,000.)
- b. "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (Note: Item 4 divided by the number of loans should NOT exceed \$100,000.)

RCON6999	NR	1.
		2.
RCON5562	NR	2 a
RCON5563	NR	2 b

### Dollar amounts in thousands

3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (sum of items 3.a through 3.c must be less than or equal to Schedule RC-C, Part I, sum of items 1.e.(1) and 1.e.(2)):

- a. With original amounts of \$100,000 or less
- b. With original amounts of more than \$100,000 through \$250,000
- c. With original amounts of more than \$250,000 through \$1,000,000

4. Number and amount currently outstanding of "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (sum of items 4.a through 4.c must be less than or equal to Schedule RC-C, Part I, item 4):

- a. With original amounts of \$100,000 or less
- b. With original amounts of more than \$100,000 through \$250,000
- c. With original amounts of more than \$250,000 through \$1,000,000

(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
				3
RCON5564	NR	RCON5565	NR	3.a
RCON5566	NR	RCON5567	NR	3.b
RCON5568	NR	RCON5569	NR	3.c
				4
RCON5570	NR	RCON5571	NR	4.a
RCON5572	NR	RCON5573	NR	4.b
RCON5574	NR	RCON5575	NR	4.c

### Dollar amounts in thousands

5. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b, and all or substantially all of the dollar volume of your bank's "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3, have original amounts of \$100,000 or less (if your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.")

If YES, complete items 6.a and 6.b below, and do not complete items 7 and 8. If NO and your bank has loans outstanding in either loan category, skip items 6.a and 6.b and complete items 7 and 8 below. If NO and your bank has no loans outstanding in both loan categories, do not complete items 6 through 8.

6. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:

- a. "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (Note: Item 1.b, divided by the number of loans should NOT exceed \$100,000.)
- b. "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (Note: Item 3 divided by the number of loans should NOT exceed \$100,000.)

RCON6860	NR	5.
		6.
RCON5576	NR	6 a
RCON5577	NR	6 b

Dollar amounts in thousands		(Column A) Number of Loans		(Column B) Amount Currently Outstanding	
7. Number and amount currently outstanding of "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (sum of items 7.a through 7.c must be less than or equal to Schedule RC-C, Part I, item 1.b):					7.
a. With original amounts of \$100,000 or less.....	RCON5578	NR	RCON5579	NR	7.a
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5580	NR	RCON5581	NR	7.b
c. With original amounts of more than \$250,000 through \$500,000.....	RCON5582	NR	RCON5583	NR	7.c
8. Number and amount currently outstanding of "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (sum of items 8.a through 8.c must be less than or equal to Schedule RC-C, Part I, item 3):					8.
a. With original amounts of \$100,000 or less.....	RCON5584	NR	RCON5585	NR	8.a
b. With original amounts of more than \$100,000 through \$250,000.....	RCON5586	NR	RCON5587	NR	8.b
c. With original amounts of more than \$250,000 through \$500,000.....	RCON5588	NR	RCON5589	NR	8.c

## J. Appendix B – Copy of Public Notice

### CRA Strategic Plan Public Notice

First Century Bank (FCB), located at 1731 N. Elm St., Commerce, Ga. 30529, with an additional branch located at 19 Shelter Cove Ln, Suite 103, Hilton Head Island, South Carolina, 29928 is seeking comment for its 2023-2026 Community Reinvestment Act (CRA) Strategic Plan. Regulations require a bank that has developed a CRA Strategic Plan to publish notice of the plan and solicit formal written public comment for at least a 30 day period. In conformance with this requirement, FCB hereby provides public notice of its plan to submit a four year CRA Strategic Plan to the Office of the Comptroller of the Currency (OCC). Written comments from the public concerning the CRA Strategic Plan are encouraged. To obtain a copy of the FCB CRA Strategic Plan at no charge to the requesting party, individuals may request a copy by mail or phone (by contacting Anna Beck at 706-335-8275). All written requests to obtain a copy of the CRA Strategic Plan or to provide comments regarding the plan should be directed to:

First Century Bank  
 ATTN: Compliance Dept.  
 P.O. Box 210  
 Commerce, Ga. 30529

Comments regarding the plan may also be submitted to [compliance@myfcbusa.com](mailto:compliance@myfcbusa.com)

**10.**

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**CRA**  
**Public**  
**File**  
**Workpaper**



# CRA PUBLIC FILE WORKPAPER

Name of Bank: First Century Bank NA

Date of Review: 03/26/24

Reviewed By: Anna Beck

## ITEMS REQUIRED TO BE IN THE MAIN OFFICE'S CRA PUBLIC FILE:

1. All written comments from the public relating to the institution's CRA performance and any responses to them for the current and preceding two calendar years (except those that reflect adversely on the good name or reputation of any persons other than the institution).

YES

NO

NA

Comment

X

2. The institutions most recent CRA Performance Examination.  
Date of CRA PE: 04/06/2020

X

3. A map of each assessment areas showing its boundaries.  
(Should have census tracts shown on map or on a separate list.)

X

4. A list of the institution's branches (main office & branches) their street addresses and census tracts.

X

5. A list of the branches opened and closed during the current and each of the prior two calendar years, their street addresses and census tracts.

X

6. A list of services for loans and deposit products generally offered, transaction fees for loans and deposits, and hours of operation at the institution's main office & branches, including any material differences in the availability or cost of services between those locations.

X

7. The institution's loan-to-deposit ratio for each quarter of the prior calendar year.

X

8. A quarterly report of the institution's efforts to improve its record if it received a less than satisfactory rating during its most recent CRA examination.

X

9. HMDA Disclosure Statements for the prior two calendar years for the institution and for each non-depository affiliate the institution has elected to include in assessment of its CRA record, if applicable.  
(Can obtain from ffiec.gov)

X

**AT EACH BRANCH:** A copy of the CRA Performance Evaluation and a list of services available at the branch.

X

Note: Mark or circle exceptions in red.