

Community Reinvestment Act (CRA) Public File



Public Disclosure

Community Reinvestment Act Performance Evaluation

PUBLIC DISCLOSURE

January 6, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Claxton Bank
Certificate Number: 15826

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Bellville, Georgia 30414

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

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Atlanta, Georgia 30309-3849

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

TABLE OF CONTENTS

INSTITUTION RATING.....	1
DESCRIPTION OF INSTITUTION.....	1
DESCRIPTION OF ASSESSMENT AREAS	2
SCOPE OF EVALUATION	3
CONCLUSIONS ON PERFORMANCE CRITERIA	4
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	6
GEORGIA.....	7
DESCRIPTION OF INSTITUTION’S OPERATIONS IN GEORGIA	7
SCOPE OF EVALUATION – GEORGIA.....	7
CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA	7
GEORGIA NON-MSA ASSESSMENT AREA – Full-Scope Review.....	8
SAVANNAH MSA ASSESSMENT AREA – Full-Scope Review	13
FLORIDA – Full-Scope Review.....	18
DESCRIPTION OF INSTITUTION’S OPERATIONS IN FLORIDA	18
SCOPE OF EVALUATION – FLORIDA	20
CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA.....	20
APPENDICES.....	23
SMALL BANK PERFORMANCE CRITERIA	23
SUMMARY OF RATINGS FOR RATED AREAS.....	24
GLOSSARY	25

INSTITUTION RATING

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

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

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

DESCRIPTION OF INSTITUTION

The Claxton Bank is a \$259.7 million state-chartered depository institution headquartered in Bellville, Georgia. The Claxton Bank is wholly owned by Southern Bankshares, Inc., a one-bank holding company located in Claxton, Georgia. The bank does not have any affiliates or subsidiaries. The institution received a Satisfactory rating at the previous FDIC CRA Performance Evaluation dated November 4, 2019, based on Interagency Small Institution Examination Procedures.

The Claxton Bank operates three full-service branches and one limited-service branch throughout Evans and Bryan Counties in Georgia and Duval County in Florida. The bank's main office and Claxton Square branch are in Evans County, and the Richmond Hill branch is in Bryan County. Evans County is located within the Georgia Non-Metropolitan Statistical Area (MSA), and Bryan County is located within the Savannah, GA MSA (Savannah MSA). The Jacksonville branch is in Duval County within the Jacksonville, FL MSA (Jacksonville MSA). Since the previous evaluation, the bank transitioned the Richmond Hill loan production office (LPO) into a full-service branch, closed the Bellville branch located in Evans County, and opened its Jacksonville branch. Currently, due to ongoing renovations at the main office, the Bellville branch has reopened and is temporarily functioning as the bank's main office. The bank has not had any merger activity since the previous evaluation.

The Claxton Bank's lending focus is commercial lending. The bank's loan products include commercial loans, construction loans, residential mortgage loans, home equity lines of credit, and

consumer loans. The bank offers a variety of deposit products, including checking, savings, certificates of deposit, and individual retirement accounts. The bank also offers Automated teller machines (ATMs), online banking, mobile banking, and telephone banking as alternative systems for delivering retail banking services.

As of the September 30, 2025, Consolidated Reports of Condition and Income (Call Report), the bank had total assets of \$259.7 million, total deposits of \$223.2 million, and total loans of \$164.1 million. Since the previous CRA performance evaluation, total assets increased by 99.8 percent. Simultaneously, the bank experienced a 98.0 percent increase in total deposits and a 99.4 percent increase in total loans. The loan portfolio is illustrated in the following table.

Loan Portfolio Distribution as of 09/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	25,754	15.7
Secured by Farmland	5,195	3.2
Secured by 1-4 Family Residential Properties	24,879	15.1
Secured by Multifamily (5 or more) Residential Properties	15,211	9.3
Secured by Nonfarm Nonresidential Properties	74,677	45.5
Total Real Estate Loans	145,716	88.8
Commercial and Industrial Loans	14,576	8.9
Agricultural Production and Other Loans to Farmers	28	0.0
Consumer Loans	3,831	2.3
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	21	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(69)	(0.0)
Total Loans	164,103	100.0
<i>Source: Reports of Condition and Income</i>		

As reflected in the above table, the bank’s major loan products are commercial and residential real estate loans. The Call Report data shows that commercial loans (including those secured by nonfarm, nonresidential real estate) comprise 54.4 percent and residential real estate loans comprise 24.4 percent of the bank’s loan portfolio by dollar volume.

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet the credit needs of the assessment area.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The FDIC evaluates the bank’s CRA performance based on its activity within the defined assessment areas. The Claxton Bank has two rated areas, which consist of three designated assessment areas. The first rated area is Georgia, which consists of the Georgia Non-MSA assessment area and the Savannah MSA assessment area. The second rated area is Florida, which consists of the Jacksonville MSA assessment area.

Since the previous evaluation, The Claxton Bank expanded its assessment area by adding the Savannah MSA assessment area to the Georgia rated area. With the opening of a branch in Jacksonville, FL, the assessment area now includes the Florida rated area, which consists of the Jacksonville MSA assessment area. Refer to the rated areas and individual assessment areas for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated November 4, 2019, to the current evaluation dated January 6, 2026. Examiners used the Interagency Small Institution Examination Procedures to evaluate The Claxton Bank’s CRA Performance.

Examiners evaluated the bank’s lending volume, deposit activity, and branching network to determine the rated area that would receive the most weight in the overall conclusions, analysis, and assigned ratings. As shown in the table below, the Georgia rated area contains the highest volume of loans and deposits, as well as the greatest number of branches. Accordingly, examiners placed more weight on the Georgia rated area.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Georgia Non-MSA	3,734	41.2	148,469	73.5	1	33.3
Savannah MSA	3,328	36.7	23,888	11.8	1	33.3
Georgia Subtotal	7,062	77.9	172,357	85.3	2	66.6
Jacksonville MSA	2,000	22.1	29,725	14.7	1	33.3
Total	9,062	100.0	202,082	100.0	3	100.0

Source: Bank Data; FDIC Summary of Deposits (06/30/2025)

Examiners reviewed all assessment areas using full-scope procedures. Examiners reviewed the Georgia Non-MSA assessment area using full-scope procedures because it represents the largest portion of the bank’s lending activity by both number and dollar volume. In addition, examiners reviewed the Savannah MSA and Jacksonville MSA assessment areas using full-scope procedures because they are new since the previous evaluation. As the Jacksonville MSA assessment area is the only assessment area within Florida, the conclusions for this assessment area directly determine the overall rating for the Florida rated area.

Activities Reviewed

The CRA evaluation requires examiners to review lending performance with respect to home mortgage, small business, and small farm loans, if significant. Examiners determined that the bank’s major product lines are small business loans and home mortgage loans. Examiners placed more weight on small business loans in determining the overall rating. This conclusion considered the bank’s business strategy, as well as the number and dollar volumes of loans originated during

the evaluation period. Additionally, no other loan types, such as small farm loans, represent a major product line and are not included in the review. The following table shows the bank’s originations from January 1, 2024, through December 31, 2024.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	12,924	16.7	19	9.3
Secured by Farmland	693	0.9	5	2.4
Secured by 1-4 Family Residential Properties	6,838	8.8	27	13.2
Multi-Family (5 or more) Residential Properties	7,021	9.1	3	1.4
Commercial Real Estate Loans	43,800	56.5	28	13.6
Commercial and Industrial Loans	3,225	4.1	35	17.1
Agricultural Loans	16	0.0	1	0.5
Consumer Loans	2,483	3.2	85	41.5
Other Loans	507	0.7	2	1.0
Total Loans	77,507	100.0	205	100.0

Source: Bank Data January 1, 2024, through December 31, 2024.

This evaluation considered all home mortgage loans reported for 2024 under the Home Mortgage Disclosure Act (HMDA). The bank did not report HMDA data prior to 2024. In 2024, the bank reported 25 loans totaling \$10.5 million. Examiners used aggregate HMDA data and demographic data from the 2020 U.S. Census as a comparison.

This evaluation also considered all small business loans originated in 2024. The bank originated 52 small business loans totaling \$9.4 million in 2024. Examiners reviewed the universe of 2024 small business loans for Assessment Area Concentration. Examiners selected all small business loans that were originated inside the assessment areas for analysis under the Geographic Distribution and Borrower Profile criterion. The bank originated 36 small business loans totaling approximately \$6.2 million within the assessment areas. Examiners used D&B demographic data as a comparison.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Claxton Bank demonstrated satisfactory performance under the Lending Test. The majority of loans in the assessment areas, as well as the reasonable loan-to-deposit ratio, geographic distribution, and borrower profile performances, support this conclusion. The overall lending performance was consistent across both rated areas.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution’s size, financial condition, and the assessment areas’ credit needs. The loan-to-deposit ratio calculated from the Call Report data averaged 66.2 percent over the last 24 calendar quarters from December 31, 2019, to September 30, 2025. The ratio ranged from a low of 58.8 percent as of September 30, 2021, to a high of 76.3 percent as of June

30, 2025. While the bank’s loan-to-deposit ratio fluctuated during the evaluation period, it remained relatively consistent compared to the prior evaluation when it was 69.9 percent.

Examiners compared the bank’s loan-to-deposit ratio to two similarly situated institutions operating within Georgia. Examiners selected the institutions based on similar size, portfolio composition, and market area. The Claxton Bank’s average net loan-to-deposit ratio is reasonable in comparison to the similarly situated institutions shown in the following table.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 09/30/2025 (\$000s)	Average Net LTD Ratio (%)
The Claxton Bank	259,692	66.2
First Bank of Coastal Georgia	218,584	25.7
The Peoples Bank	270,980	70.5
<i>Source: Reports of Condition and Income 12/31/2019 – 09/30/2025</i>		

Assessment Area Concentration

A majority of loans are in the bank’s assessment areas. The Claxton Bank originated a majority of its small business loans by number and dollar volume inside the assessment areas. In contrast, the bank originated less than a majority of its home mortgage loans, by number and dollar volume, inside its assessment areas. Examiners attributed this distribution to intense competition for home mortgage lending within the assessment areas and slowing demand driven by housing affordability constraints. Since examiners placed more weight on small business lending, overall, a majority of loans are in the bank’s assessment areas. The following table shows the distribution of loans originated inside and outside of the assessment areas.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	12	48.0	13	52.0	25	2,881	27.5	7,608	72.5	10,489
Small Business	36	69.2	16	30.8	52	6,181	65.6	3,236	34.4	9,417
Total	48	62.3	29	37.7	77	9,062	45.5	10,884	54.5	19,906
<i>Source: 2024 HMDA Reported Data; Bank Data</i>										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Performance is consistent between the rated areas. Examiners weighed performance more heavily in the State of Georgia when arriving at conclusions.

Borrower Profile

The distribution of borrowers reflects, given the demographics of assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. Performance is consistent in the State of Georgia but inconsistent in the State of Florida. Examiners weighed performance more heavily in the State of Georgia when arriving at conclusions.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

GEORGIA

CRA RATING FOR GEORGIA: SATISFACTORY

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

The Georgia rated area includes the Georgia Non-MSA and the Savannah MSA assessment areas. The Georgia Non-MSA assessment area consists of Evans and Tattnall Counties, while the Savannah MSA assessment area consists of Bryan County. The Savannah MSA assessment area is new since the previous evaluation. The bank operates its main office and a limited-service branch in the Georgia Non-MSA assessment area, as well as one full-service branch in the Savannah MSA assessment area. The rated area contains 75.0 percent of the bank's branch offices. The rated area represents 77.9 percent of bank-wide loans by dollar volume and 85.3 percent of bank-wide deposits.

SCOPE OF EVALUATION – GEORGIA

The scope for the State of Georgia remains relatively consistent with that used for the bank as a whole, except as noted below. The Georgia Non-MSA assessment area received the greatest weight in this rated area, as it contains the highest volume of the bank's loans and deposits within Georgia. The Savannah MSA assessment area received limited weight in comparison. Since home mortgage lending was not a primary lending focus in the Savannah MSA assessment area, the analysis relied solely on small business lending data in this assessment area. Refer to the overall Scope of Evaluation for additional details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

The Claxton Bank demonstrated satisfactory performance under the Lending Test for Georgia. The reasonable geographic distribution and borrower profile performances support this conclusion. Performance is consistent in both assessment areas within Georgia.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Reasonable dispersion throughout the assessment areas supports this conclusion. Examiners placed more weight on the bank's performance in the Georgia Non-MSA assessment area.

Borrower Profile

The distribution of borrowers reflects, given the demographics of assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. Excellent penetration in the Georgia Non-MSA assessment area outweighed poor penetration in the Savannah MSA assessment area to support this conclusion. Examiners placed more weight on the bank's performance in the Georgia Non-MSA assessment area.

GEORGIA NON-MSA ASSESSMENT AREA – Full-Scope Review

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

The Claxton Bank designates the Georgia Non-MSA assessment area as all of Evans and Tattnall counties. The bank operates its main branch and one limited-service branch in the assessment area. The Georgia Non-MSA assessment area accounts for 52.9 percent of rated area lending by dollar volume and 86.1 percent of rated area deposits.

Economic and Demographic Data

The Georgia Non-MSA assessment area consists of 2 moderate-, 7 middle- and 1 upper-income census tracts based on 2020 U.S. Census data. Since the previous evaluation, the 2020 U.S. Census data was released, resulting in changes to tract designations. The total number of census tracts within the assessment area increased from 8 to 10. Moderate-income census tracts increased from 1 at the previous evaluation to 2 at the current evaluation, and middle-income census tracts increased from 6 at the previous evaluation to 7 at the current evaluation. The number of low- and upper-income census tracts remains unchanged. Additionally, the percentage of families below the poverty level decreased, indicating an improvement in overall economic conditions since the previous evaluation. The following table provides additional demographic information for the assessment area.

Demographic Information of the Georgia Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	20.0	70.0	10.0	0.0
Population by Geography	33,616	0.0	29.7	61.7	8.6	0.0
Housing Units by Geography	14,794	0.0	21.5	69.4	9.1	0.0
Owner-Occupied Units by Geography	8,004	0.0	18.9	71.8	9.3	0.0
Occupied Rental Units by Geography	4,347	0.0	27.7	61.7	10.6	0.0
Vacant Units by Geography	2,443	0.0	19.0	75.0	5.9	0.0
Businesses by Geography	2,052	0.0	25.3	65.1	9.6	0.0
Farms by Geography	223	0.0	21.5	70.9	7.6	0.0
Family Distribution by Income Level	8,563	23.2	16.4	20.6	39.9	0.0
Household Distribution by Income Level	12,351	24.3	14.7	19.2	41.8	0.0
Median Family Income Non-MSAs - GA	\$55,981	Median Housing Value Median Gross Rent Families Below Poverty Level			\$92,693 \$566 15.5%	

*Source: 2020 U.S. Census and 2024 D&B Data. *The NA category consists of geographies not assigned an income classification. Due to rounding, totals may not equal 100%.*

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units to the distribution of households in low-, moderate-, middle-, and upper-income tracts. The 2020 U.S. Census data shows that a significant majority of owner-occupied housing units and businesses are located within the middle- and upper-income tracts, indicating

most of the lending opportunities exist within these geographies. The remaining owner-occupied housing units and businesses are in moderate-income census tracts.

Examiners used the FFIEC-updated Georgia Non-MSA median family income (MFI) levels to analyze home mortgage loans under the Borrower Profile criterion. The following table presents each income category.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2024 (\$69,300)	<\$34,650	\$34,650 to <\$55,440	\$55,440 to <\$83,160	≥\$83,160
<i>Source: FFIEC</i>				

The analysis of home mortgage lending by borrower income uses families by income level as a comparison for bank performance. The median housing value is over \$92,000, which can potentially make housing unaffordable for low-income individuals. Therefore, lending opportunities to low-income families may be limited.

The top industries in the Georgia Non-MSA assessment area are educational services, retail trade, and manufacturing. Further, 75.7 percent of businesses operate with four or fewer employees, and 92.0 percent operate from a single location. The top employers within each of the counties in the assessment area are listed below.

- Evans County – Camellia Health and Rehabilitation, Claxton Cold Storage, and Claxton Poultry Co.
- Tattnall County – Canoochee Electric Membership Corp., Daybreak Industrial, Inc., and Fries Farms, LLC.

According to the U.S. Bureau of Labor Statistics, unemployment rates in both counties within the Georgia Non-MSA assessment area increased slightly from 2022 to August 2025. Despite these increases, unemployment levels remained relatively stable throughout the period as compared to the national rate. Tattnall County consistently reported slightly higher unemployment rates than Georgia and Evans County.

Unemployment Rates				
Area	2022	2023	2024	August 2025
	%	%	%	%
Evans County	3.1	3.1	3.2	3.4
Tattnall County	3.3	3.5	3.6	3.7
Georgia	3.2	3.3	3.5	3.5
National Average	3.6	3.6	4.0	4.2
<i>Source: Bureau of Labor Statistics</i>				

Competition

Competition for financial services within the Georgia Non-MSA assessment area is moderate. According to the FDIC Deposit Market Share data as of June 30, 2025, five financial institutions operate 12 offices in the assessment area. The Claxton Bank ranked 3rd with 19.9 percent of total deposits. The Glennville Bank is the leader in deposit market share at 40.3 percent, with South Georgia Bank at 27.8 percent and Renasant Bank at 6.8 percent.

There is a high level of competition for home mortgage loans among numerous banks, credit unions, and non-depository mortgage lenders in this assessment area. According to home mortgage aggregate lending data for 2024, 99 lenders reported 533 residential mortgage loans originated or purchased in the assessment area. The Claxton Bank ranked 10th with a 2.1 percent market share by number of loans. The top three lenders in the assessment area include The Glennville Bank that ranked 1st with a market share of 25.9 percent by number; Rocket Mortgage, LLC at 9.8 percent; and South Georgia Bank at 8.3 percent. The top three lenders account for 44.0 percent of the market share by number and 31.9 percent by dollar volume.

The Claxton Bank is not a CRA data reporter. Therefore, the analysis of small business lending under the Lending Test does not include comparisons to aggregate data. However, aggregate data provides context regarding the level of demand for small business loans within the assessment area. Aggregate data for 2024 indicates that 41 lenders reported 391 small business loans originated or purchased in the assessment area. The top three lenders in the assessment area include American Express National Bank that ranked 1st with a market share of 26.1 percent; Synchrony Bank at 12.3 percent; and JP Morgan Chase Bank, NA at 11.8 percent. The top three lenders account for 50.2 percent of the market share by number and 13.2 percent by dollar volume.

Community Contact(s)

As part of the CRA evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit needs. This information helps determine whether local financial institutions are responsive to these needs, as well as identify available credit opportunities. Examiners conducted a community contact interview with an economic development organization that serves the assessment area.

The community contact stated that the assessment area, specifically Tattnall County, is designated as a Tier One county, which is characterized by persistent economic distress and limited economic opportunities. The local economy is supported by agriculture, institutional employers, and limited industrial activity. Agricultural production centers on onion farming and poultry processing, with recent growth in cricket farming, while the timber industry has declined. The county is also home to three correctional facilities; however, employment at these facilities has decreased since the COVID-19 pandemic.

The community contact noted that employment opportunities consist of a mix of local jobs and commuting opportunities, supported by proximity to a state university, a military base, and an automobile manufacturing facility in nearby counties. The housing stock includes both older and

newer units. While new housing development occurred in recent years, activity has slowed due to higher material costs and slowing demand.

The community contact stated that development efforts within the assessment area include cannabis cultivation and expansion into other agricultural products, as well as plans for local airport expansion. However, limited infrastructure constraints restrict business attraction.

Lastly, the community contact stated that the primary credit need in the community is real estate-related lending, driven by rising housing prices and sustained rental demand associated with the nearby military base. Although commercial lending opportunities are limited, banks are actively and competitively lending and are effectively meeting the community's credit needs.

Credit Needs

Considering information from the community contact and demographic and economic data, examiners determined affordable housing represents a primary credit need for the assessment area. Nearly 40.0 percent of families are low- or moderate-income, with low-income families earning less than \$34,650 annually. In contrast, the median housing value exceeds \$92,000, indicating that housing affordability remains a significant challenge for these households.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GEORGIA NON-MSA ASSESSMENT AREA

LENDING TEST

The Claxton Bank demonstrated satisfactory performance under the Lending Test. The reasonable geographic distribution performance and excellent borrower profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The reasonable records for both small business and home mortgage loans support this conclusion. Examiners focused on the percentage of loans by number in moderate-income census tracts, as there are no low-income census tracts in the assessment area.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The bank's performance in moderate-income census tracts was comparable to the demographic data, reflective of reasonable performance.

Geographic Distribution of Small Business Loans GA Non-MSA Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	25.3	6	26.1	460	28.5
Middle	65.1	17	73.9	1,153	71.5
Upper	9.6	0	0.0	0	0.0
Total	100.0	23	100.0	1,613	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable penetration throughout the assessment area. The bank's performance in moderate-income census tracts was comparable to both the demographic data and aggregate lending data, reflective of reasonable performance.

Geographic Distribution of Home Mortgage Loans GA Non-MSA Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Moderate	18.9	17.8	2	18.2	974	45.9
Middle	71.8	71.3	9	81.8	1,147	54.1
Upper	9.3	10.9	0	0.0	0	0.0
Total	100.0	100.0	11	100.00	2,121	100.0
<i>Source: 2020 U.S. Census; 2024 HMDA Data; 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>						

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, excellent penetration among individuals and households of different income levels and businesses of different sizes. Excellent penetration among businesses of different sizes primarily supports this conclusion.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the assessment area, excellent penetration among businesses of different sizes. Lending to small businesses with gross annual revenues of \$1 million or less exceeded the demographic data, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category GA Non-MSA Assessment Area					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	88.2	23	100.0	1,613	100.0
> \$1,000,000	2.5	0	0.0	0	0.0
Revenue Not Available	9.3	0	0.0	0	0.0
Total	100.0	23	100.0	1,613	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different incomes (including low- and moderate-income). As shown in the table below, lending to low-income borrowers significantly exceeded the demographic and aggregate lending data. Lending to moderate-income borrowers was below both demographic and aggregate lending data but still within a reasonable range.

Distribution of Home Mortgage Loans by Borrower Income Level GA Non-MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	23.2	6.0	3	27.3	104	4.9
Moderate	16.4	16.0	1	9.1	29	1.4
Middle	20.6	22.5	1	9.1	93	4.4
Upper	39.9	39.0	4	36.4	828	39.0
Income Not Available	0.0	16.5	2	18.2	1,067	50.3
Totals	100.0	100.0	11	100.0	2,121	100.0
<i>Source: 2020 U.S. Census; 2024 HMDA data; 2024 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%.</i>						

SAVANNAH MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SAVANNAH MSA ASSESSMENT AREA

The Claxton Bank’s Savannah MSA assessment area consists of all of Bryan County, one of the three counties in the Savannah MSA. The bank operates one full-service branch in the assessment area, representing 33.3 percent of its branch locations in the rated area. The bank added the Savannah MSA assessment area in April 2023 following the conversion of a loan production office to a full-service branch. The Savannah MSA assessment area accounts for 47.1 percent of rated area lending by dollar volume and 13.9 percent of rated area deposits.

Economic and Demographic Data

The Savannah MSA assessment area consists of two moderate-, two middle- and three upper-income census tracts, and two census tracts with no available income census data based on the 2020 U.S. Census. The following table provides additional demographic information on the assessment area.

Demographic Information of the Savannah MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	22.2	22.2	33.3	22.2
Population by Geography	44,738	0.0	26.7	16.4	54.6	2.2
Housing Units by Geography	14,778	0.0	30.8	18.2	47.4	3.7
Owner-Occupied Units by Geography	9,561	0.0	24.2	19.2	52.4	4.2
Occupied Rental Units by Geography	3,942	0.0	44.7	11.9	40.6	2.8
Vacant Units by Geography	1,275	0.0	36.8	29.9	30.4	2.9
Businesses by Geography	3,151	0.0	30.1	17.3	51.5	1.2
Farms by Geography	50	0.0	28.0	20.0	52.0	0.0
Family Distribution by Income Level	10,415	16.5	14.9	20.5	48.1	0.0
Household Distribution by Income Level	13,503	18.3	11.5	17.7	52.5	0.0
Median Family Income Savannah MSA - GA		\$75,128	Median Housing Value Median Gross Rent Families Below Poverty Level			\$219,242 \$1,368 8.8%

*Source: 2020 U.S. Census and 2024 D&B Data. *The NA category consists of geographies not assigned an income classification. Due to rounding, totals may not equal 100%.*

The top industries in the Savannah MSA assessment area are educational and health services, leisure and hospitality services, and government. Top employers within the assessment area are Gulfstream Aerospace Corp., Ft. Stewart/Hunter Army Airfield, and St. Joseph’s/Candler. Further, 74.7 percent of businesses operate with four or fewer employees, and 95.3 percent operate from a single location.

According to the U.S. Bureau of Labor Statistics, unemployment rates in Bryan County increased slightly from 2022 to August 2025. Despite this increase, the unemployment level remained relatively stable and consistently below the national and state averages throughout the period.

Unemployment Rates				
Area	2022	2023	2024	August 2025
	%	%	%	%
Bryan County	2.7	2.8	2.9	3.0
Georgia	3.2	3.3	3.5	3.5
National Average	3.6	3.6	4.0	4.2

Source: Bureau of Labor Statistics

Competition

Competition for financial services within the Savannah MSA assessment area is moderate. According to the FDIC Deposit Market Share data as of June 30, 2025, eight financial institutions operate nine offices in the assessment area. The Claxton Bank ranked 7th with 3.0 percent of total market share. The First Bank of Coastal Georgia is the leader in deposit market share at 27.3 percent, with SouthState Bank, NA at 24.2 percent and Ameris Bank at 19.8 percent.

The Claxton Bank is not a CRA data reporter. Therefore, the analysis of small business lending under the Lending Test does not include comparisons to aggregate data. However, aggregate data provides context regarding the level of demand for small business loans within the assessment area. Aggregate data for 2024 indicates that 56 lenders reported 1,144 small business loans originated or purchased in the assessment area. American Express National Bank was ranked 1st with a market share of 30.1 percent, with JPMorgan Chase Bank, NA at 16.9 percent and Capital One, NA at 6.1 percent completing the top three lenders in the market. The top three lenders account for 53.1 percent of the market share by number and 17.7 percent by dollar volume.

Community Contact(s)

As part of the CRA evaluation process, examiners contact organizations active in the assessment area to assist in identifying credit needs and to help determine whether local financial institutions are responsive to these needs.

Examiners referenced an existing contact with a local county official within Bryan County. The community contact indicated that the assessment area is improving overall. The opening of a Hyundai manufacturing facility, the presence of one of the top ten public school systems in Georgia, as well as the growth at Savannah Port, have contributed to increased in-migration of residents and businesses. However, Bryan County continues to experience a shortage of skilled workers. In addition, housing supply has not kept pace with growing demand, even with recent construction activity, resulting in rising housing prices. These factors have created a heightened need for affordable housing within the assessment area. Additionally, the community contact stated that financial institutions are highly engaged in lending activity within the assessment area, particularly community-sized institutions.

Credit Needs

Considering information from management, the community contact, and demographic and economic data, examiners determined affordable housing represents a primary credit need for the assessment area. Over 30.0 percent of families are low- or moderate-income, with low-income families earning less than \$46,200 annually. In contrast, the median housing value exceeds \$219,000, indicating that housing affordability remains a significant challenge for these households. Small business lending also represents a credit need as demographic data reflects that 92.6 percent of businesses have revenues of less than \$1 million, and 74.7 percent of businesses have four or fewer employees.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SAVANNAH MSA ASSESSMENT AREA

LENDING TEST

The Claxton Bank demonstrated satisfactory performance under the Lending Test. The reasonable geographic distribution performance outweighed the poor borrower profile performance to support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Examiners focused on percentage of loans by number in the moderate-income census tracts, as there are no low-income census tracts in the assessment area.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The bank’s lending performance in moderate-income census tracts exceeded the demographic data, reflective of reasonable performance.

Geographic Distribution of Small Business Loans Savannah MSA Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	30.1	3	37.5	1,408	54.8
Middle	17.3	0	0.0	0	0.0
Upper	51.5	5	62.5	1,160	45.2
NA	1.2	0	0.0	0	0.0
Total	100.0	8	100.0	2,568	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, poor penetration among businesses of different sizes.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the assessment area, poor penetration among businesses of different sizes. The bank’s performance in lending to businesses with gross annual revenues of \$1 million or less was significantly below demographic data. Examiners also considered the bank’s year-to-date 2025 small business lending; however, the bank only had 3 small business loans in the Savannah MSA assessment area, so examiners could not identify any meaningful trends or conclusions. While the bank’s performance cannot be directly compared to aggregate data, the aggregate data provides information on the level of demand for small business loans. The most recent aggregate data available is 2024, which reflects that all institutions reporting small business loans in the assessment area originated 44.8 percent of the

loans to small businesses. This indicates potentially lower demand for these loans with the bank’s performance indicative of reasonable responsiveness to the small business lending demand. The assessment area is characterized by a high level of competition within the small business lending market, which makes it difficult for the bank to lend to small businesses. Additionally, the bank’s recent entry into the assessment area further constrained its ability to penetrate the small business market. Despite these considerations, however, the bank’s performance in lending to small businesses is poor.

Distribution of Small Business Loans by Gross Annual Revenue Category Savannah MSA Assessment Area					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	92.6	3	37.5	560	21.8
> \$1,000,000	1.2	5	62.5	2,008	78.2
Revenue Not Available	6.2	0	0.0	0	0.0
Total	100.0	8	100.0	2,568	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

FLORIDA – Full-Scope Review

CRA RATING FOR FLORIDA: SATISFACTORY

DESCRIPTION OF INSTITUTION’S OPERATIONS IN FLORIDA

The Florida rated area includes the Jacksonville MSA assessment area. The Jacksonville MSA consists of a total of five counties; however, The Claxton Bank only delineates Duval, Clay, St. Johns, and Nassau Counties in their assessment area. The Jacksonville MSA assessment area is new since the prior evaluation following the opening of the full-service branch in Duval County in September 2024, which is the only branch in the rated area. The rated area contains 33.3 percent of the bank’s full-service offices. The rated area represents 22.1 percent of bank-wide loans by dollar volume and 14.7 percent of bank-wide deposits.

Economic and Demographic Data

The Jacksonville MSA assessment area consists of 22 low-, 88 moderate-, 128 middle- and 93 upper-income census tracts, and 8 census tracts with no income data available. The following table provides additional demographic information on the assessment area.

Demographic Information of the Jacksonville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	339	6.5	26.0	37.8	27.4	2.4
Population by Geography	1,577,589	5.0	25.1	39.9	29.5	0.6
Housing Units by Geography	646,446	5.5	25.9	38.3	29.7	0.7
Owner-Occupied Units by Geography	370,941	3.3	20.3	40.1	35.9	0.5
Occupied Rental Units by Geography	198,851	8.9	36.2	36.1	17.9	1.0
Vacant Units by Geography	76,654	7.8	26.4	35.1	30.3	0.5
Businesses by Geography	245,017	4.9	22.9	38.3	32.0	1.9
Farms by Geography	1,308	1.7	19.2	43.0	33.9	2.1
Family Distribution by Income Level	374,552	21.2	18.2	20.0	40.7	0.0
Household Distribution by Income Level	569,792	22.8	16.8	18.8	41.6	0.0
Median Family Income Jacksonville, FL MSA	\$76,537	Median Housing Value Median Gross Rent Families Below Poverty Level				\$230,316 \$1,136 8.9%
<i>Source: 2020 U.S. Census and 2024 D&B Data. *The NA category consists of geographies not assigned an income classification. Due to rounding, totals may not equal 100%.</i>						

The 2020 U.S. Census shows that a majority of businesses are in middle- and upper-income tracts, indicating most of the lending opportunities exist within these geographies. The remaining businesses are primarily in moderate-income census tracts, with only a small percentage located in low-income census tracts. Additionally, a minimal portion of businesses are in census tracts for which income data are unavailable.

The top industries in the Jacksonville MSA assessment area are educational and health services, professional and business services, and retail trade. Further, 65.3 percent of businesses operate with four or fewer employees, and 96.0 percent operate from a single location. The top employers within each of the counties in the assessment area are listed below.

- Clay County – Clay County School District, Orange Park Medical Center, and Walmart.
- Duval County – Duval County School District, Amazon, and City of Jacksonville.
- Nassau County – Nassau County School District, Omni Hotel Jacksonville, and Ritz Carlton Hotel.
- St. Johns County – St. Johns County School District, Publix, and Flagler Hospital.

According to the U.S. Bureau of Labor Statistics, unemployment rates increased in all counties within the Jacksonville MSA assessment area from 2022 to August 2025. Among these counties, St. Johns County experienced the largest increase. Despite these increases, unemployment levels remained consistently below the national average throughout the period. Additionally, Duval County consistently reported slightly higher unemployment rates than the state average overall.

Unemployment Rates				
Area	2022	2023	2024	August 2025
	%	%	%	%
Clay County	2.8	2.9	3.4	3.8
Duval County	3.2	3.2	3.5	3.8
Nassau County	2.7	2.9	3.2	3.6
St. Johns County	2.5	2.8	3.3	3.7
Florida	3.0	3.0	3.4	3.7
National Average	3.6	3.6	4.0	4.2

Source: Bureau of Labor Statistics

Competition

Competition for financial services within the Jacksonville MSA assessment area is high. According to the FDIC Deposit Market Share data as of June 30, 2025, 37 financial institutions operate 253 offices in the assessment area. The Claxton Bank ranked 33rd with less than 0.1 percent of total market share. Bank of America is the leader in deposit market share at 53.3 percent, with EverBank, NA at 24.6 percent and Wells Fargo Bank, NA at 5.1 percent.

The Claxton Bank is not a CRA data reporter. Therefore, the analysis of small business lending under the Lending Test does not include comparisons to aggregate data. However, aggregate data provides context regarding the level of demand for small business loans within the assessment area. Aggregate data for 2024 indicates that 159 lenders reported 47,273 small business loans originated or purchased in the assessment area. American Express National Bank was ranked 1st with a market share of 29.1 percent, with JPMorgan Chase Bank, NA at 19.3 percent and Bank of America, NA at 8.5 percent completing the top three lenders in the market. The top three lenders account for 56.9 percent of the market share by number and 31.2 percent by dollar volume.

Community Contact(s)

As part of the CRA evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available. Examiners conducted a community contact interview with an economic development organization that serves the assessment area.

The community contact indicated that the primary economic drivers within the Jacksonville MSA include the military, financial services, insurance, real estate, manufacturing, logistics, and transportation sectors. Most industries within Jacksonville MSA are experiencing growth. A significant portion of the resident workforce commutes to St. Johns and Duval counties, reflecting regional interdependence for job opportunities. The area has experienced an increase in higher-wage employment relative to historical norms. However, the contact noted that substantial income inequality persists, particularly within St. Johns County.

Lastly, the community contact stated that housing prices increased at an annual rate of approximately 10.0 to 20.0 percent in recent years, though price appreciation has recently slowed. Housing affordability remains a significant concern, especially in St. Johns County, where demand for rental and multifamily housing is high.

Credit Needs

Considering information from management, demographic and economic data, examiners determined affordable housing represents a primary credit need for the assessment area. Nearly 40.0 percent of families are low- or moderate-income, with low-income families earning less than \$39,000 annually. In contrast, the median housing value exceeds \$230,000, indicating that housing affordability remains a significant challenge for these households. Small business lending also represents a credit need, as demographic data reflects that 93.1 percent of businesses have revenues of less than \$1 million, and 65.3 percent of businesses have four or fewer employees.

SCOPE OF EVALUATION – FLORIDA

The bank did not originate any home mortgage loans within the rated area in 2024, as its focus has been commercial lending in Florida with the recent entry into the Jacksonville market. As a result, examiners did not review home mortgage lending in Florida, and the analysis relied solely on small business lending data. Refer to the overall Scope of Evaluation for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

LENDING TEST

The Claxton Bank has demonstrated satisfactory performance under the Lending Test. The reasonable geographic distribution performance and poor borrower profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Reasonable performance regarding small business loans supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The following table shows that, although the bank did not originate any of its small business loans in moderate-income census tracts, the bank's level of lending in low-income census tracts significantly exceeds demographic data by 15.1 percent. Examiners considered the bank's recent expansion into the assessment area and the high level of competition for small business lending within the area. Examiners also reviewed the bank's 2025 partial-year small business lending data and determined that lending in low-income census tracts was comparable to the percentage of businesses located in those census tracts. Additionally, the bank's 2025 performance in moderate-income census tracts was only slightly below the percentage of businesses located in those tracts. Considering the performance context, the bank's geographic distribution of small business loans is reasonable.

Geographic Distribution of Small Business Loans Jacksonville MSA Assessment Area					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	4.9	1	20.0	532	26.6
Moderate	22.9	0	0.0	0	0.0
Middle	38.3	3	60.0	1,361	68.1
Upper	32.0	1	20.0	107	5.4
NA	1.9	0	0.0	0	0.0
Total	100.0	5	100.0	2,000	100.0

Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, poor penetration among businesses of different sizes.

Small Business Loans

The distribution of borrower reflects, given the demographics of the assessment area, poor penetration among businesses of different sizes. The bank's performance in lending to businesses with gross annual revenues of \$1 million or less was significantly below demographic data. Examiners also reviewed the bank's year-to-date 2025 small business lending in the Jacksonville MSA assessment area and noted similar lending penetration to businesses with revenues of \$1 million or less. While the bank's performance cannot be directly compared to aggregate data, the aggregate data provides information on the level of demand for small business loans. The most recent aggregate data available is 2024, which reflects that all institutions reporting small business loans in the assessment area originated 50.8 percent of the loans to small businesses. This indicates potentially lower demand for these loans with the bank's performance indicative of reasonable

responsiveness to the small business lending demand. The assessment area is characterized by a high level of competition within the small business lending market, which makes it difficult for the bank to lend to small businesses. Additionally, the bank’s recent entry into the assessment area further constrained its ability to penetrate the small business market. Despite these considerations, however, the bank’s performance in lending to small businesses is poor.

Distribution of Small Business Loans by Gross Annual Revenue Category Jacksonville MSA Assessment Area					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
≤ \$1,000,000	93.1	2	40.0	639	32.0
> \$1,000,000	1.8	3	60.0	1,361	68.1
Revenue Not Available	5.1	0	0.0	0	0.0
Total	100.0	5	100.0	2,000	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Rating
GEORGIA	Satisfactory
FLORIDA	Satisfactory

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Public Comments

- None to be disclosed as of 4.1.2026

LOCATIONS



Main Branch

PO Box 247, 121 W Main St, Claxton, GA 30417

Branch Phone: 912-739-5600

Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Drive-Up Hours

- Monday: 8:30AM - 4PM
- Tuesday: 8:30AM - 4PM
- Wednesday: 8:30AM - 4PM
- Thursday: 8:30AM - 4PM
- Friday: 8:30AM - 5PM
- Saturday: Closed
- Sunday: Closed

Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's, Wire Transfers, Safe Deposit Boxes, ATM, Night Depository

Closed until 4th Qtr
2026 for remodeling



Jacksonville Branch

1 Independent Drive, Suite 1800, Jacksonville, FL 32202

Branch Phone: 904-717-7220

Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's, Wire Transfers



Square Branch

400 North Duval Street, Claxton, GA 30417

Branch Phone: 912-739-5602

Lobby Hours

- Monday: 9AM - 5PM
- Tuesday: 9AM - 5PM
- Wednesday: 9AM - 5PM
- Thursday: 9AM - 5PM
- Friday: 9AM - 5PM
- Saturday: 8:30AM - 1PM
- Sunday: Closed

Drive-Up Hours

- Monday: 9AM - 5PM
- Tuesday: 9AM - 5PM
- Wednesday: 9AM - 5PM
- Thursday: 9AM - 5PM
- Friday: 9AM - 5PM
- Saturday: 8:30AM - 1PM
- Sunday: Closed

Services

Teller/Cash Services, Drive Up ATM, Night Depository



Richmond Hill Branch

2591 Hwy 17, Suite 201 Richmond Hill, GA 31324

Branch Phone: 912-445-7005

Lobby Hours

- Monday: 9AM - 4PM
- Tuesday: 9AM - 4PM
- Wednesday: 9AM - 4PM
- Thursday: 9AM - 4PM
- Friday: 9AM - 5PM
- Saturday: Closed
- Sunday: Closed

Services

Teller/Cash Services, Loans, New Accounts, CD's and IRA's



Bellville ATM

1433 Bernie Anderson Hwy, Bellville, GA 30414

Branch Phone:



Newton Street

3 South Newton Street, Claxton, GA 30417

Branch Phone:

Permanently Closed to Customer Traffic

Newton Street Loan Operations center is permanently closed to customer traffic. To speak with a member of our lending team, please visit our Main Branch Location at 121 West Main Street, in Claxton, Georgia or call 912-739-3322.

Retail Banking Products and Services

Checking Accounts



TCB Lifetime Checking

No Minimum Balance Required

Earns Interest

This account earns interest at competitive market rates when you maintain a daily minimum balance of \$1,000.00 during a statement period.

\$0 or \$10.00 Monthly Maintenance Fee

The account owner is 24 years old or younger *OR* The account owner is 62 years or older *OR* The account has 1 direct deposit per statement cycle *AND* is enrolled in e-statements *OR* The account maintains a minimum daily balance of \$1,000.00 throughout the statement cycle.

\$100 Minimum to Open

There is a minimum deposit of \$100 required to open this account.

ATM Fee Refunds

ATM fee refunds up to a total of \$20.00 per statement cycle when daily minimum balance remains \$1,000.

Savings Accounts

Add TCB Swipe-N-Save Automatic Round-Up Savings

TCB's optional SwipeNSave program makes it easy to save every day by automatically rounding up each purchase you make with your TCB MasterCard Debit Card to the nearest whole dollar and depositing that amount in your linked savings account. The best part is TCB matches 100% of your rounded-up savings for the first 90 days.



Lifetime Savings

Earns Interest

Variable interest rate, compounded quarterly and credited quarterly

\$0 or \$10.00 Quarterly Maintenance Fee

No monthly maintenance fee if the account owner is 21 years old or younger *OR* the account is enrolled in e-statements *OR* you maintain a balance daily balance of \$500.

\$100 Minimum to Open

There is a minimum deposit of \$100 required to open this account.

Transaction Limits

Savings accounts no longer have federal transaction limits, but they're still best suited for saving, not for everyday use. If you need to make frequent transactions, a checking account is likely a better fit.



Lifetime Money Market

Earns Interest

Variable interest rate, compounded monthly and credited monthly, if you maintain a daily minimum balance of \$2,500.00, with higher balances qualifying for higher rates.

\$0 or \$5.00 Monthly Maintenance Fee

No monthly maintenance fee if you maintain a daily balance of \$2,500.

\$2,500 Minimum to Open

There is a minimum deposit of \$2,000 required to open this account.

Unlimited Deposits

Transaction Limits

Money market accounts no longer have federal transaction limits, but they're still best suited for saving, not for everyday use. If you need to make frequent transactions, a checking account is likely a better fit.

CDs

Earns Interest

Fixed interest rate, compounds and credits periodically depending on CD duration.

Multiple Durations Available

- 91 days minimum deposit \$2500
 - 182 days minimum deposit \$2500
 - 12 months minimum deposit \$500
 - 18 months minimum deposit \$500
 - 24 months minimum deposit \$500
 - 36 months minimum deposit \$500
 - 48 months minimum deposit \$500
 - 60 months minimum deposit \$500
- 30 days minimum deposit \$2500

Early Withdrawal Penalty

There may be a 3 to 6 month early withdrawal penalty.

IRAs

Earns Interest

Fixed interest rate, compounded monthly and credited monthly.

Multiple Durations Available

- 12 months minimum deposit \$500
- 24 months minimum deposit \$500
- 60 months minimum deposit \$500

Tax Advantages

Contributions may be tax deductible or qualified distributions may be tax free depending on account type.

Required Minimum Distribution

The IRS may require that you withdraw a minimum amount annually for some types of accounts.

ADD YOUR DEBIT CARD WITH THE **PUSH OF A BUTTON**

Introducing Debit Card Push Provisioning For Mobile Wallets.

Pushing the limits of convenience: Adding your debit card to a mobile wallet has never been quicker, thanks to our effortlessly easy push provisioning. Just open card control from our mobile app and tap the "add to wallet" button, to add your card. No more entering the details or calling the bank for verification. Adding your debit card to a mobile wallet just became the easiest move in your financial playbook. Just another way TCB makes banking simple.



Personal Online Banking

Multi-Check Mobile Deposit

Deposit checks remotely, without a trip to the branch.

Deposit checks anywhere at any time. With multi-check mobile deposit, you can deposit up to 25 checks at a time in one transaction directly from your smartphone. It is as easy as entering the check amount and snapping a photo. Save time and get more done with the iBankTCB digital banking app.¹

Digital Banking

DIGITAL BANKING DONE RIGHT!

There is so much that you can do with the iBankTCB digital banking app, all without ever leaving your home. Check your balance, manage your card, send money all with a few taps. Banking has never been so easy — finally, a digital banking app for the modern age.

Debit Card Controls

Control your debit card right from the app.

Your debit card is in your control, with Card Controls in digital banking. Turn your card on and off instantly with the tap of a button, activate new cards, change your PIN, request temporary limit increases, set travel alerts, and report your card lost or stolen. It's never been easier to manage your card.

Mobile Wallet Enabled

Forgot your wallet? No problem pay with your phone.

We support all the major mobile payment platforms including Apple Pay, Google Pay, and Samsung Pay, so you can enjoy the security and convenience of making payments with your mobile device. Adding your card to a mobile wallet means that you can leave your actual wallet at home.



Account Details

Manage your account and move money with just a few taps.

Manage your money like a pro and stay connected with all your accounts. Check balances, schedule transfers, make loan payments, automate bills, initiate stop pays, and more - all from your phone, all on the go.

Automatic Bill Pay

Never forget to pay a bill again, with TCB BillPay.

Manage your money like a pro and stay connected with all your accounts. Check balances, schedule transfers, make loan payments, automate bills, initiate stop pays, and more - all from your phone, all on the go.²

External Transfers

Account Alerts

Stay on top of your accounts with SMS and push notifications.

Stay in the know with custom alerts from the iBankTCB digital banking app. You can set up SMS or push alerts on your available balances, cleared checks, debits, NSF items, pending ACH items, online transfers, BillPay, and more.³

SPIN PAY

Pay anyone instantly via text message or email.

With SPIN Pay from TCB you can send money to anyone in the US instantly directly from our app for free. All they need is a phone number or email address and a US based debit card. Unlike other P2P services, you don't need to maintain a separate funding account, and the recipient doesn't need to download an app. Transfers are made directly from your account to their account instantly.

E-Statements



Safe Deposit Boxes

From house deeds to family jewelry, TCB Deposit Boxes help keep your most important items from getting lost, damaged, destroyed or stolen. Our safe deposit boxes are available in a variety of sizes and are competitively priced to help you secure your possessions. Ask a customer service representative for details.

Tele-banking Powerline 912-739-7693



TCB COMMON ACCOUNT FEATURES FEE SCHEDULE

Schedule of Fees

IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

Limits and fees - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Replacement Debit Card: \$15.00 (mailed)

Verify Debit Card PIN: \$10.00

Convenience Issue Debit Card: \$20.00

Check printing:

- * Fee depends on the style of check ordered

Cashier's Check: \$3.00 (non-customers)

Overdraft Fee (Paid Items) (each) \$32.00

Returned Item Fee (each) \$32.00

- * The categories of transactions for which an overdraft fee may be imposed are those by any of the following means: check, in-person withdrawal, or other electronic means.

Account Activity Printout: \$5.00

Account Research: \$25.00 per hour/ \$5.00 per copy

\$15.00 per statement with images

Account balancing assistance: \$25.00 per hour

Bill Pay Fee: \$4.95 per month/Consumer

\$7.95 per month/Commercial

- * Additional Bill Pay transactions in excess of 15 will be charged \$0.45 per transaction.

Stop Payment-All Items: \$32.00 per item

Schedule of Fees

Drawdown Wire \$25.00
Wire Transfer Fee (outgoing): \$25.00 domestic/ \$50.00 international

Digital Banking Wire Transfer Fee (outgoing): \$15.00 domestic/ \$35.00 international

Garnishments: \$50.00

Executions: \$50.00

Levies: \$50.00

Transfer fee for OD Protection: \$5.00

Dormant Account: \$5.00 per month/ \$60.00 maximum

- An account is dormant if for 12 months:
 - There have been no deposits or withdrawals to the account
 - There has been no communication about the account
 - Account statements returned for an incorrect address

ATM Limits:

You may withdrawal no more than \$500.00 per day. There is a Foreign ATM Fee of \$2.00 per withdrawal charged at ATMs we do not own or operate.

Mastercard Debit Card Limits:

You may not exceed \$2,000.00 in signature-based transactions per day or \$2,000.00 in PIN based point-of-sale transactions per day unless a different dollar limit has been disclosed to you. You may not exceed \$500.00 per day in cash withdrawals from an ATM.

Early Closure of Checking and Savings Accounts:

There will be a \$10.00 charge if the account closes within six months of opening.

Loans:

- Short Term Loans
- Term Loans
- Real Estate Construction
- Overdraft Line of Credit
- Secured Loans
- Business Line of Credit
- Commercial Real Estate
- SBA
- Unsecured Loans
- Home Equity Line of Credit
- Residential Real Estate
- Credit Cards

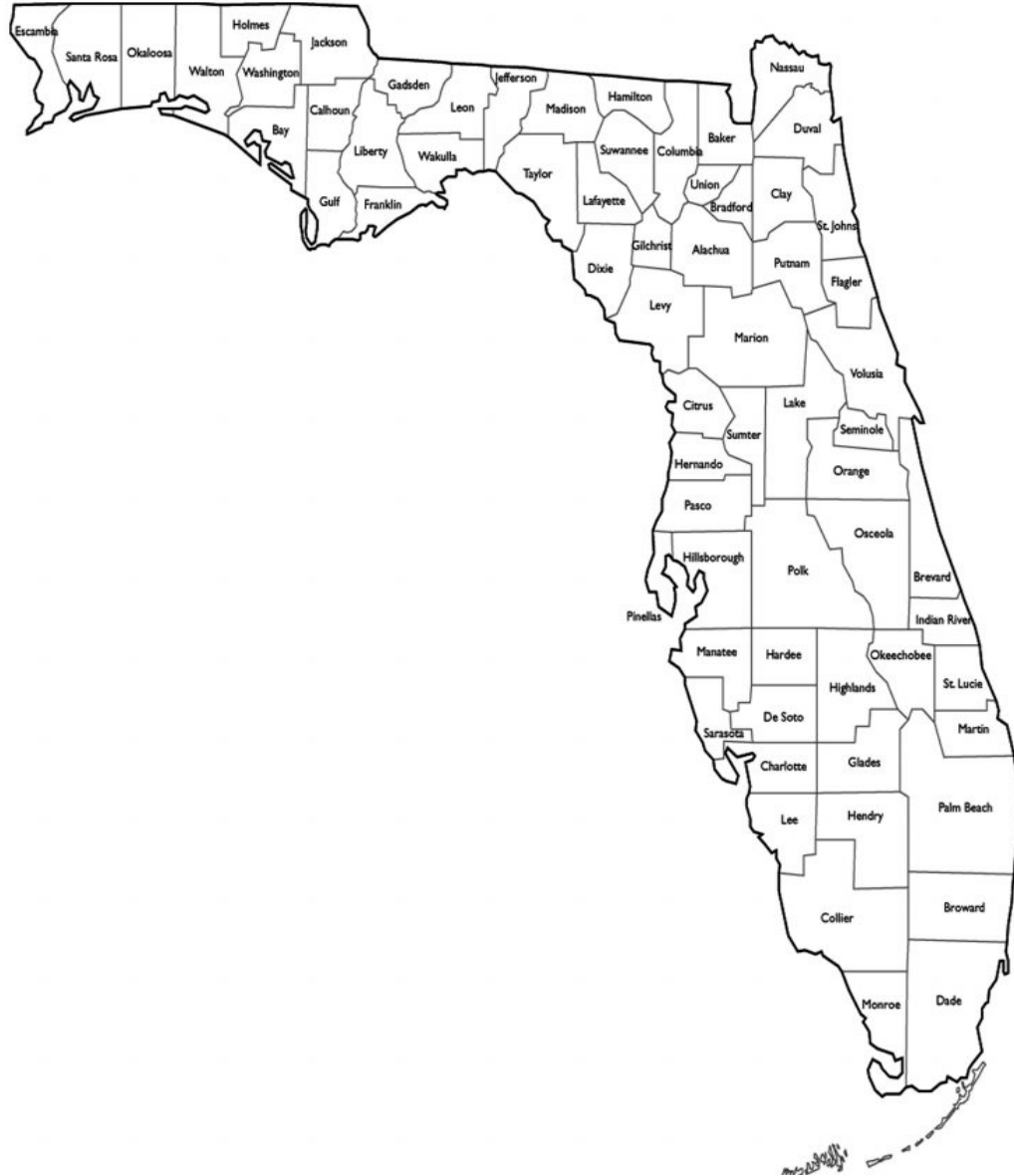
Loan Fees:

- All new real estate loans consumer or business- 1% Loan Origination Fee with minimum of \$500
- Consumer Real Estate Renewals - \$500 Loan Origination Fee
- Business Real Estate Renewals - \$500 Loan Origination Fee
- Non real estate loans consumer or business - \$300 Loan Origination Fee. Minimum loan amount \$1,500. CD Secured loans - \$75 Fee.



Georgia Facility-Based Assessment Area Maps

<u>Assessment Area</u>	<u>MSA Code</u>	<u>Counties Included</u>
Claxton, Bellville	Non-MSA 9703/9702	Evans
Richmond Hill	42340 9203.03	Bryan
Main Office 121 W Main St. Claxton, GA 30417		
Claxton Square Branch 400 North Duval St. Claxton, GA 30417		
Bellville Branch 1433 Bernie Anderson Hwy, Bellville, GA 30417		
Richmond Hill Branch 2591 Hwy 17 Suite 201 Richmond Hill, GA 31324		



Florida

Facility-Based Assessment Area Maps

<u>Assessment Area</u>	<u>MSA Code</u>	<u>Counties Included</u>
Jacksonville	27260 0172.00	Duval

Jacksonville Office 1 Independent Dr, Suite 1800 Jacksonville, FL 32202

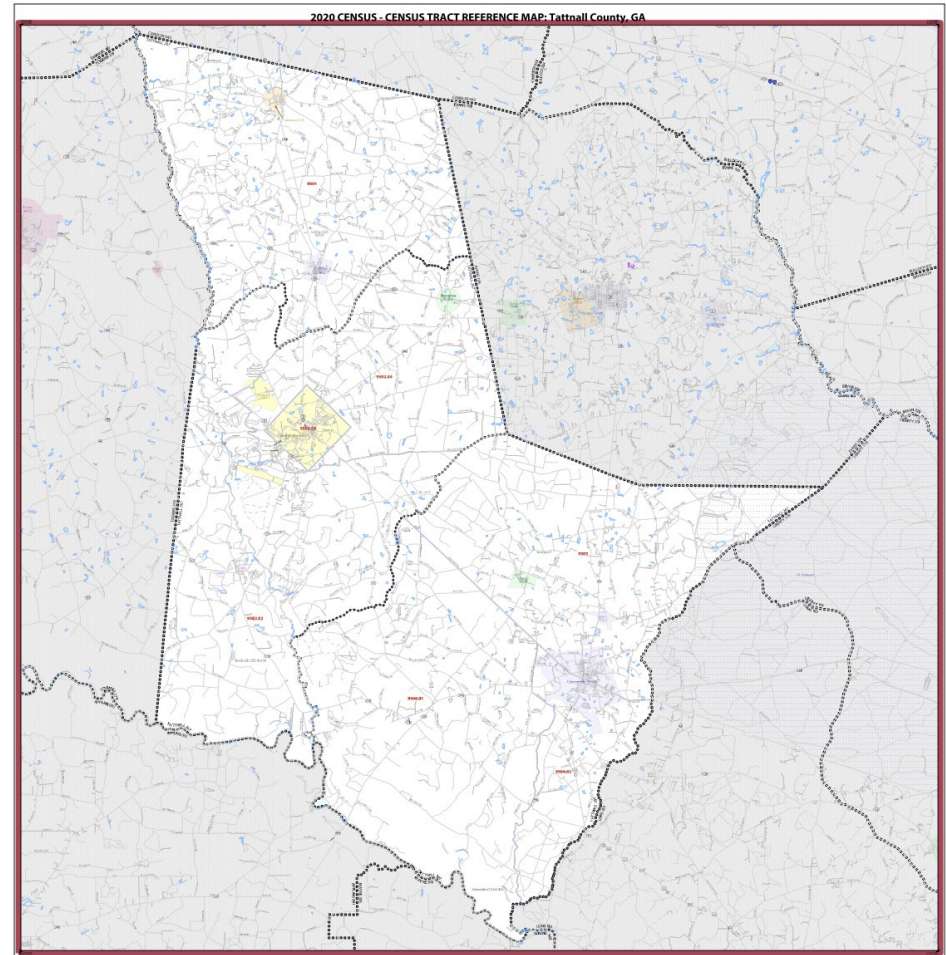


Georgia
Retail Lending Assessment Area

Tattnall County
Evans County
Bryan County

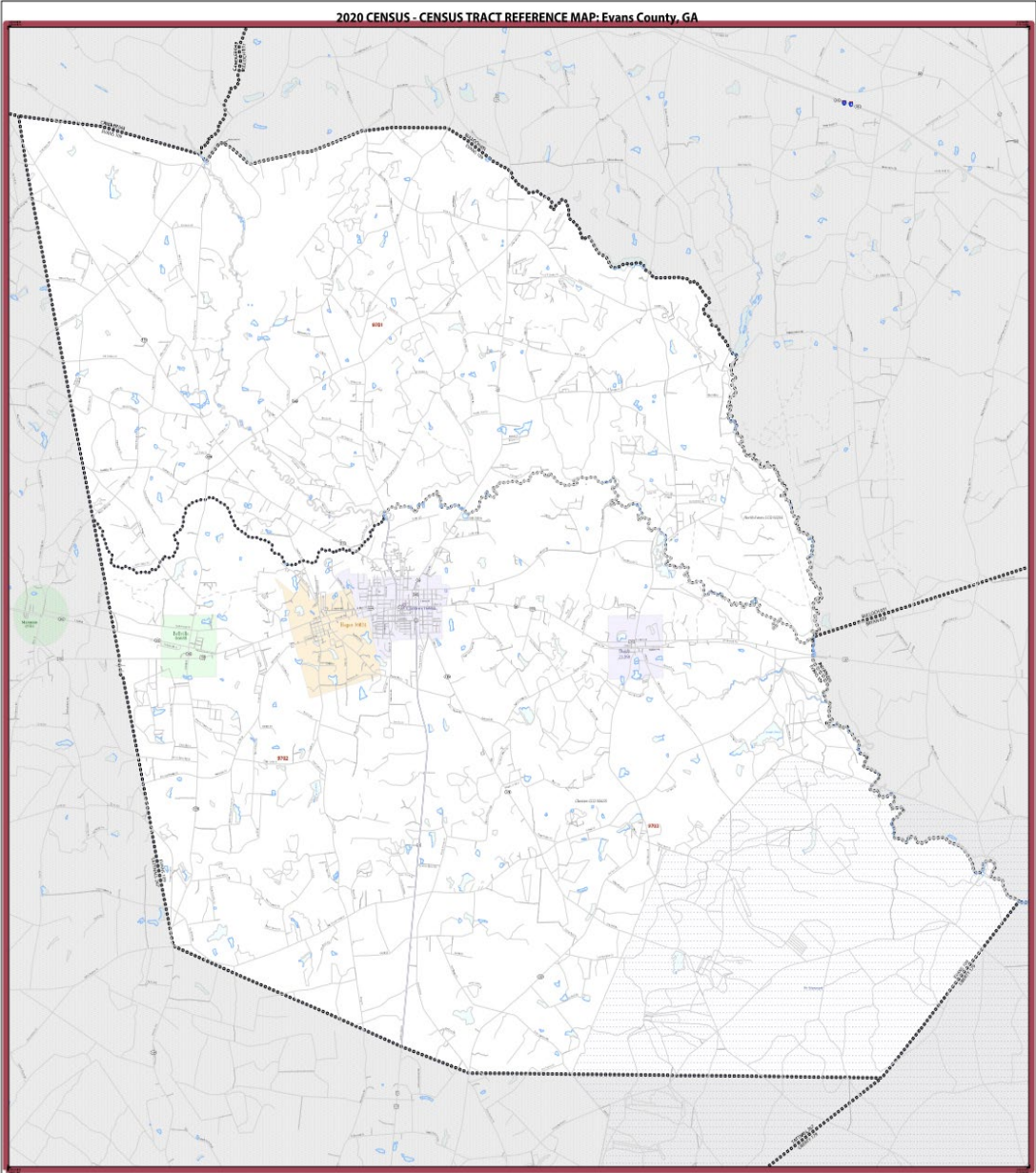
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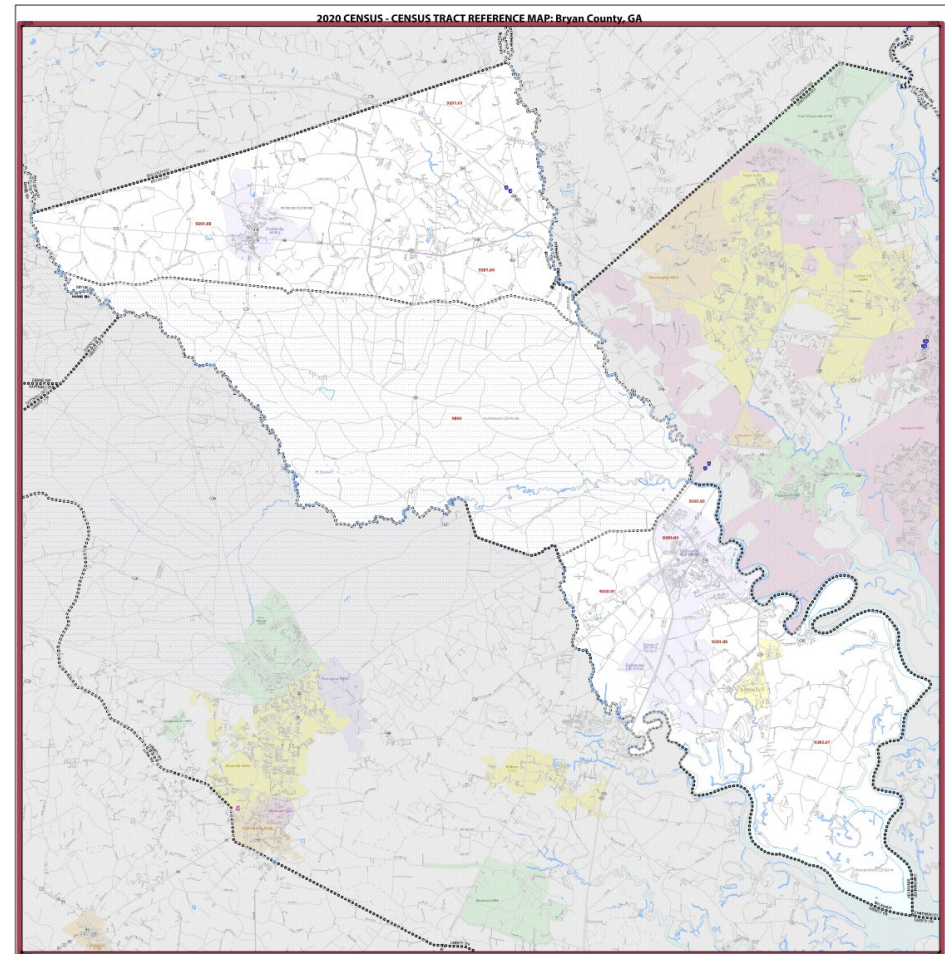
Evans County

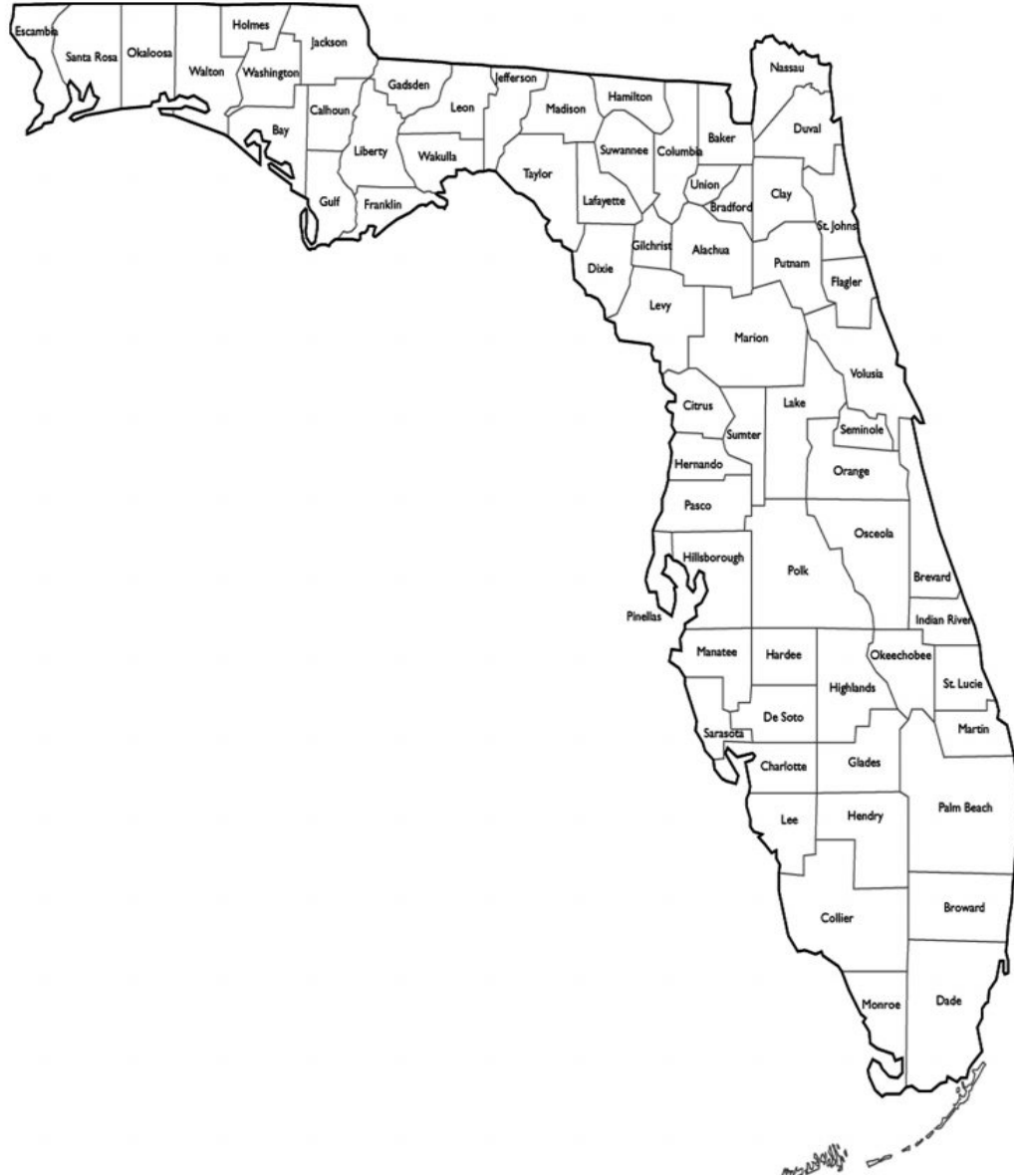
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Bryan County

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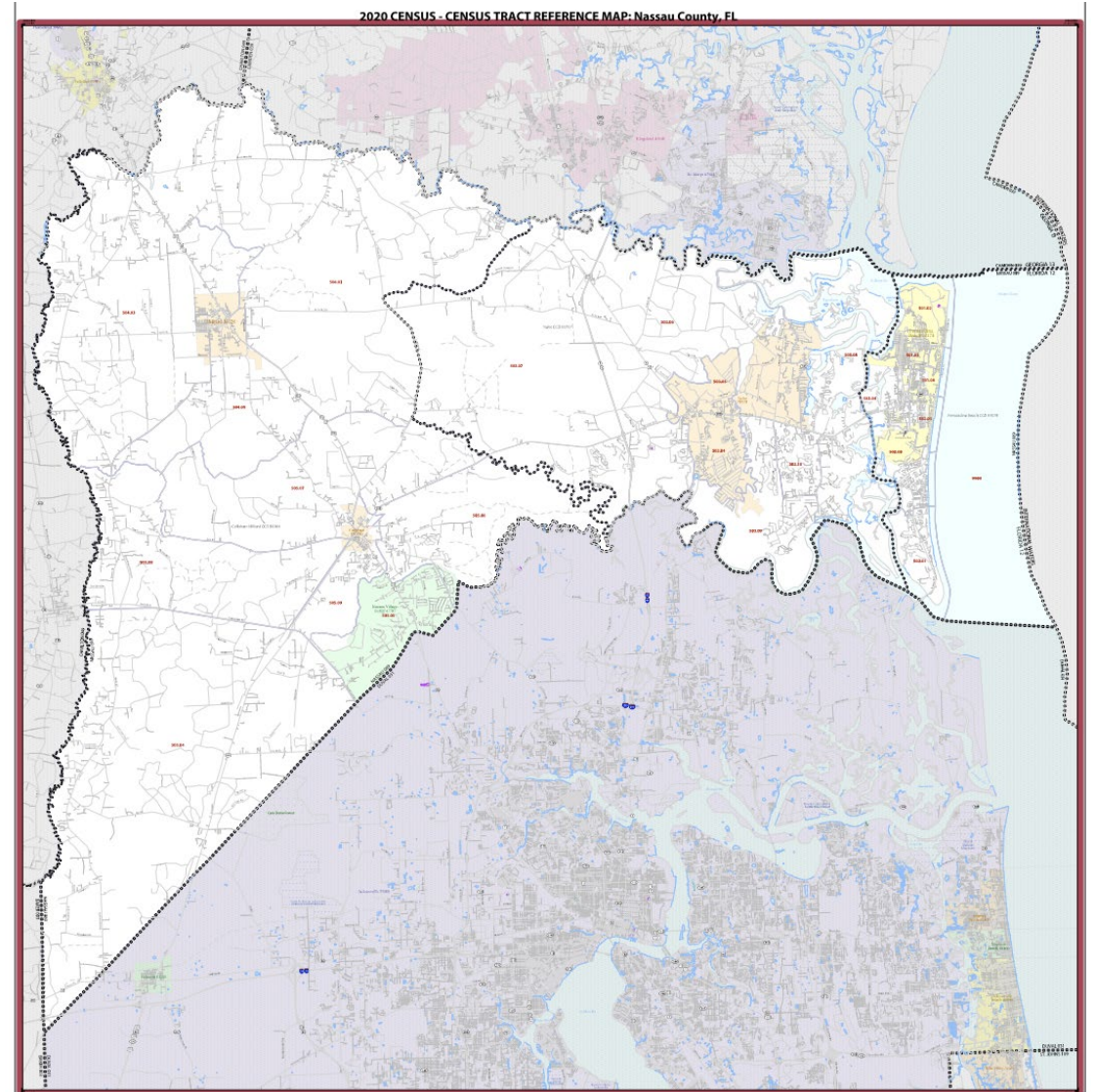
Florida
Retail Lending Assessment Area

Nassau County
Duval County
St. Johns County
Clay County

Nassau County

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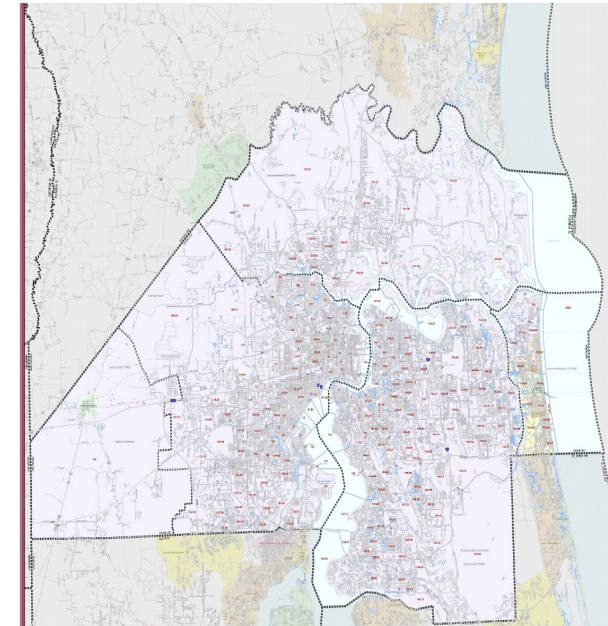
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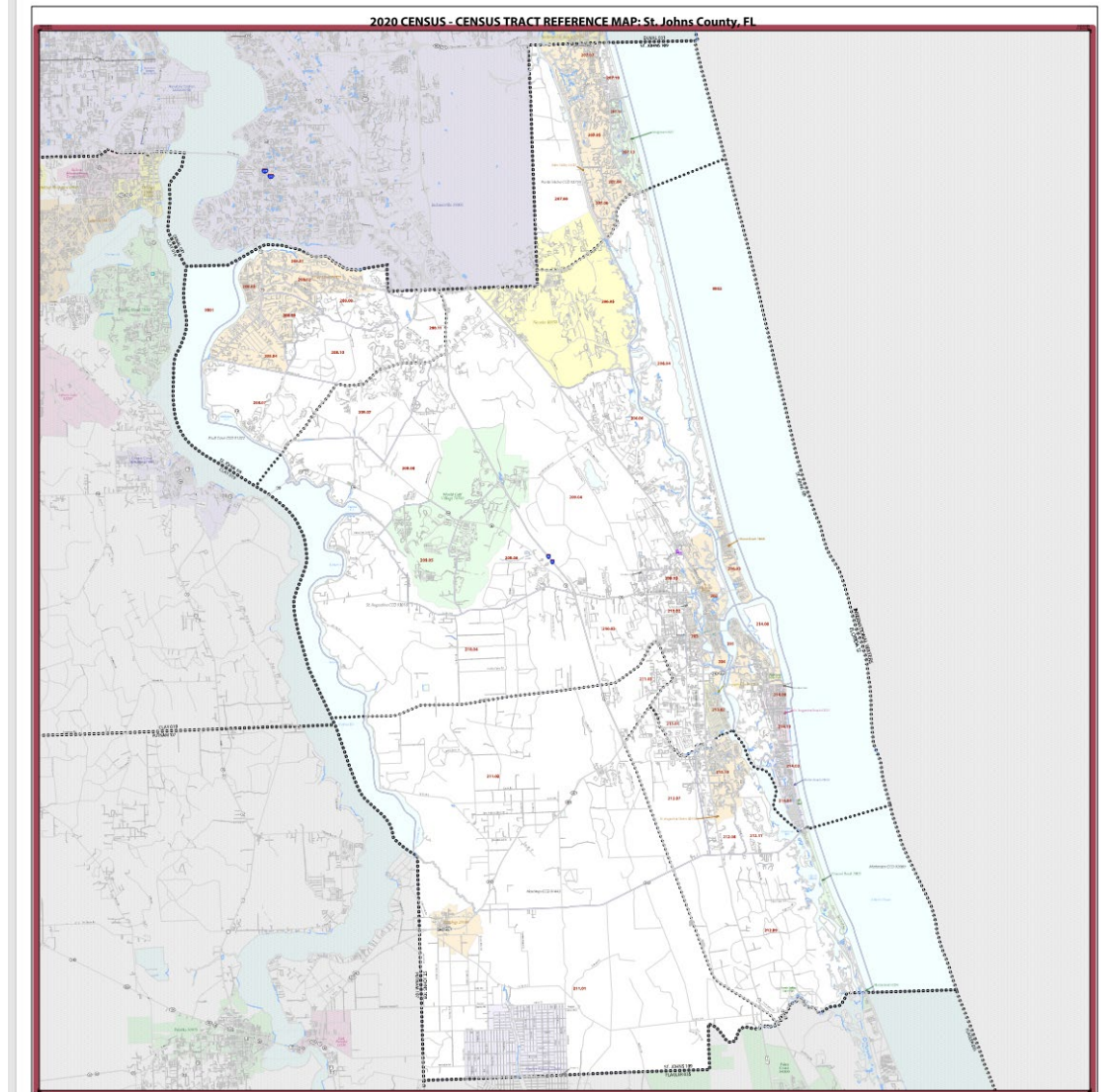
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Duval County



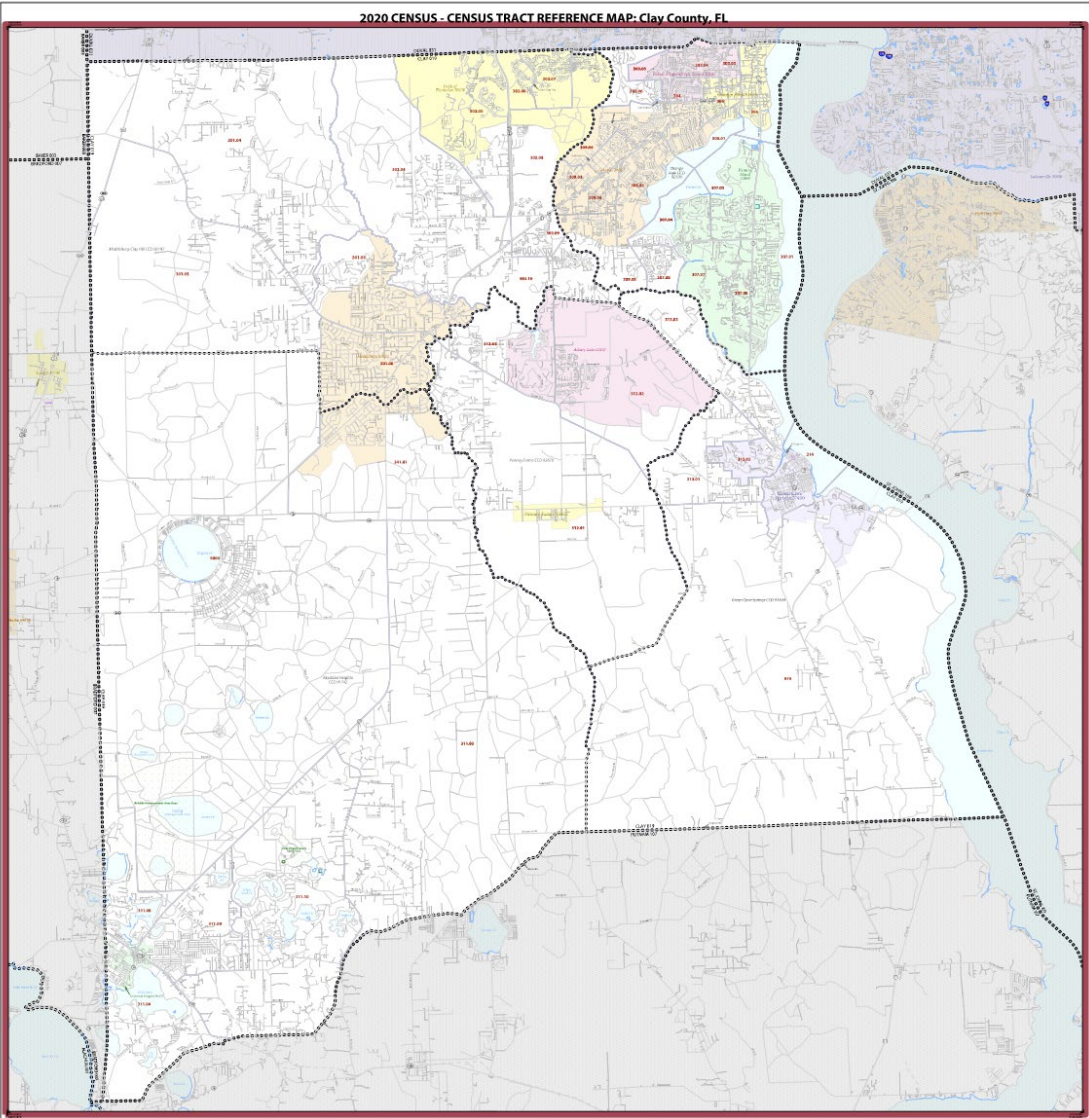
St. Johns County

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Clay County

TYPE;FULLCODE;STATE;COUNTY;TRACT;SHEETS
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Community Reinvestment Act (CRA) Notice

In accordance with the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) assesses our efforts to meet the credit needs of the communities we serve, while maintaining safe and sound business operations. This performance record is also considered by the FDIC when reviewing certain applications submitted by our institution.

We value and encourage your participation in this process.

Access to CRA Information

You have the right to obtain information regarding our operations and performance under the CRA. The following resources are available for your review at this branch:

- The public section of our most recent CRA evaluation, prepared by the FDIC.
- A list of services offered at this branch.

Additionally, upon request, we will provide the following information within five business days:

1. A map of the assessment area surrounding this branch, which is used by the FDIC to evaluate our CRA performance.
2. Information regarding other branches in the assessment area.
3. A list of services offered at these branches.
4. Data on our lending performance in the assessment area.
5. Copies of any written comments received concerning our CRA performance in the assessment area, along with our responses to those comments.

If we are operating under an approved strategic plan, a copy of that plan will also be made available. For information about our CRA performance in other communities we serve, the public file for our entire bank is accessible at our main office located at:

121 West Main Street, Claxton, GA 30417.

Submission of Comments and FDIC Examinations

At least 30 days prior to the start of each quarter, the FDIC publishes a list of banks scheduled for CRA examinations. This list can be obtained from the FDIC Regional Director at the following address:

FDIC, 10 Tenth Street NE, Suite 800, Atlanta, GA 30309-3906

You may submit written comments on our CRA performance to:

**Stephanie Courtney, Compliance Officer and CRA Officer,
and the FDIC Regional Director.**

Comments may also be submitted electronically via the FDIC's website at www.fdic.gov/regulations/cra. All submitted comments, along with our responses, will be considered during the FDIC's evaluation of our CRA performance and may become public.

Additionally, you may request access to any comments received by the FDIC Regional Director. Announcements of applications related to CRA filed by our institution or our affiliate, **Southern Bankshares**, may also be requested from the CRA Officer or the Federal Reserve Bank located at:

1000 Peachtree Street NE, Atlanta, GA 30309.

December 2025 Financial Summary – Balance Sheet

	Dec-24	Nov-25	Dec-25	MoM	YoY	Dec-25	BvA - Better / (Worse)	
	Actual	Actual	Actual	Change	Change	Budget	\$	%
Balance Sheet (\$000)								
Assets								
Cash and Due from Banks	10,985	7,548	16,413	8,865	5,428	9,672	6,741	69.7%
Fed Funds & Reverse Repos	35,202	25,685	14,174	(11,511)	(21,028)	8,000	6,174	77.2%
Securities	47,397	53,193	52,727	(466)	5,330	60,755	(8,028)	(13.2%)
Total Loans	121,461	162,835	174,333	11,498	52,872	207,461	(33,128)	(16.0%)
Allowance for Credit Losses	(2,401)	(2,783)	(2,706)	77	(305)	(3,010)	304	(10.1%)
Net Loans	119,060	160,052	171,627	11,575	52,567	204,451	(32,824)	(16.1%)
Premises & Fixed Assets	3,114	3,255	3,781	526	667	5,867	(2,086)	(35.6%)
Deferred Tax Assets	1,229	921	1,088	167	(141)	1,227	(139)	(11.4%)
Other Assets	5,537	6,040	5,476	(564)	(61)	5,555	(79)	(1.4%)
Total Assets	222,524	256,694	265,286	8,592	42,762	295,527	(30,241)	(10.2%)
Liabilities								
Demand Deposits	47,146	45,250	38,289	(6,961)	(8,857)	56,227	(17,938)	(31.9%)
Checking & NOW	33,743	34,847	39,278	4,431	5,535	35,410	3,868	10.9%
Savings	14,243	37,441	36,273	(1,168)	22,030	28,611	7,662	26.8%
Money Market	44,579	61,073	62,140	1,067	17,561	87,969	(25,829)	(29.4%)
Non Maturity Deposits	139,711	178,611	175,980	(2,631)	36,269	208,217	(32,237)	(15.5%)
Time Deposits	48,380	41,302	52,372	11,070	3,992	51,109	1,263	2.5%
Deposits	188,089	219,911	228,206	8,295	40,117	259,326	(31,120)	(12.0%)
FHLB Advances	-	-	-	-	-	-	-	-
Other Liabilities	1,469	1,451	1,805	354	336	1,812	(7)	(0.4%)
Total Liabilities	189,558	221,362	230,011	8,649	40,453	261,138	(31,127)	(11.9%)
Equity Capital								
Tier 1 Capital	35,311	36,672	36,654	(18)	1,343	36,734	(80)	(0.2%)
AOCI	(2,345)	(1,340)	(1,378)	(38)	967	(2,346)	968	(41.3%)
Total Equity Capital	32,966	35,332	35,276	(56)	2,310	34,389	887	2.6%
Total Liabilities and Equity Capital	222,524	256,694	265,286	8,592	42,762	295,527	(30,241)	(10.2%)
HoldCo. Cash	1,850	1,576	1,575	(1)	(275)	1,850	(275)	(14.9%)
HoldCo. Other Assets	-	250	250	-	250	-	250	
Tangible Book Value per Share (\$)	\$9.77	\$10.23	\$10.21	(\$0.02)	\$0.44	\$10.17	\$0.04	0.4%
Key Ratios (Holding Company)								
Nonint. Bearing Dep. / Total Dep.	25.1%	20.6%	16.8%	(380 bps)	(829 bps)	21.7%	(490 bps)	
Loan / Deposit Ratio	64.6%	74.0%	76.4%	235 bps	1182 bps	80.0%	(361 bps)	
LLR / Gross Loans	1.98%	1.71%	1.55%	(16 bps)	(42 bps)	1.45%	10 bps	
Adjusted Liquidity Ratio	33.2%	25.2%	24.9%	(29 bps)	(831 bps)	18.4%	650 bps	
TCE / TA	15.6%	14.4%	13.9%	(49 bps)	(175 bps)	12.3%	163 bps	
Tier 1 Leverage Ratio	17.3%	14.4%	15.1%	67 bps	(222 bps)	13.2%	193 bps	
Total RB Capital Ratio	27.1%	22.1%	21.4%	(67 bps)	(568 bps)	18.4%	303 bps	



Source: Company reports