



Thomasville National Bank

WRITTEN COMMENTS

To date, Thomasville National Bank has received no written comments from the public relating to the bank's performance in helping to meet community credit needs.



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

February 12, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Thomasville National Bank
Charter Number 22883

301 North Broad Street
Thomasville, GA 31792

Office of the Comptroller of the Currency

Three Ravinia Drive, Suite 400, Atlanta, Georgia 30346

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

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Overall CRA Rating

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

The lending test is rated: **Satisfactory**.

The community development test is rated: **Satisfactory**.

The major factors that support this rating include:

- The Lending Test rating for Thomasville National Bank (hereinafter referred to as TNB, or bank) is based on the combined ratings of Georgia and Florida.
- The bank's loan to deposit (LTD) ratio is more than reasonable considering the bank's size, financial condition, and credit needs in its assessment areas.
- The bank exhibits reasonable geographic distribution of loans in the bank's assessment areas (AAs).
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on the bank's responsiveness to the CD needs of its AAs demonstrated through CD activities in Georgia and Florida.
- The bank exhibits reasonable responsiveness to CD needs in the AAs through CD loans, qualified grants and donations, and CD services.

Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 91.3 percent over the past 12-quarters from January 1, 2020, to December 31, 2022. The bank's quarterly LTD ratio ranged from a high of 100.1 percent to a low of 84.1 percent.

We compared the bank's LTD ratio to three similarly situated banks with total assets ranging from \$440 million to \$1.2 billion. The quarterly average LTD ratio of the similarly situated banks during the same period was 82.2 percent, with a high of 89.0 percent and a low of 74.9 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment areas.

The bank originated and purchased 77.1 percent of its total loans by number and 75.2 percent by dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	701	76.9	211	23.1	912	204,733	74.9	68,464	25.1	273,197
Small Business	60	80.0	15	20.0	75	21,913	78.0	5,729	22.0	25,998
Total	761	77.1	226	22.9	987	226,646	75.3	74,193	24.7	300,839

Description of Institution

TNB is an intrastate community bank, headquartered in Thomasville, Georgia. The bank is wholly owned by Thomasville Bancshares, Inc., a one bank holding company, which is also headquartered in Thomasville, GA. As of December 31, 2022, TNB reported \$1.5 billion in total assets and tier one capital of \$127.8 million. Bank operations include three full-service branches in Thomasville, Georgia, St. Simon Island, Georgia and Tallahassee, Florida. The St. Simons branch operates as St. Simons Bank & Trust and the Tallahassee branch operates as Tallahassee National Bank. The bank operates TNB Financial Services, an asset management division, which offers trust, financial planning, and investment services.

As of December 31, 2022, TNB reported \$1.3 billion in outstanding loans. The loan portfolio consisted of 35.8 percent residential mortgage loans, 24.6 percent non-residential/non-farm loans, 18.3 percent commercial and industrial loans, 10.9 percent construction and development, 1.2 percent multi-family loans, and 1.9 percent consumer loans.

TNB has delineated three AAs within Georgia and Florida. In the state of Georgia, the bank has delineated the Thomasville and the St. Simons Island AAs. In the state of Florida, the bank has delineated the Tallahassee AA. As of December 31, 2022, TNB operated three full-service branches in Georgia and one full-service branch in Florida. During the evaluation period, there was one branch opening and no branch closures. The full-service Florida branch located in the Tallahassee AA opened in April 2020. In the Thomasville, Thomas County, Georgia non-MSA, TNB has 56.1 percent deposit market share and ranks first of six banks in the market. In the St Simons Island, Brunswick County, Georgia MSA, St. Simons Bank & Trust has a 4.5 percent deposit market share, ranking eighth out of the 13 banks in the market. In the Tallahassee, Leon County, MSA there are 17 banks in the market, Tallahassee National Bank has a 1.6 percent deposit market share and ranks 12th in the market.

The bank offers traditional loan and deposit products. TNB's primary loan products are residential real estate and small business loans. The bank also offers a full range of lending products to meet the credit needs of both consumer and business customers. Banking deposit products include consumer and business checking and savings accounts, online banking, mobile banking, mobile deposits, and bill pay.

During the evaluation period, there were no financial or legal impediments hindering the bank's ability to meet the credit needs of its AAs. The bank received a "Satisfactory" rating using Intermediate Small Bank (ISB) procedures at its prior CRA Performance Evaluation dated January 19, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this examination is January 1, 2020, through December 31, 2022. To determine the bank's primary lending product, we assessed the number and dollar volume of loan originations and purchases during the evaluation period. Two primary products were identified for assessment under both the geographic and borrower distribution lending tests: small business loans and home mortgages. Bank management provided small business and home mortgage information for 2020, 2021, and 2022. Examiners determined the data submitted for small business CRA data and the Home Mortgage Disclosure Act (HMDA) was reliable and accurate. In accordance with sampling guidelines a sample of small business loans and home mortgage loans were analyzed for the evaluation. The performance evaluation also includes an assessment of CD activities from, January 1, 2020, through December 31, 2022. CD activities include qualified CD loans, CD investments, grants and donations, and CD services.

Selection of Areas for Full-Scope Review

As of December 31, 2022, TNB delineated Thomas County, GA, Brunswick County, GA, and Leon County, FL as the bank's AAs. Thomas County is a non-Metropolitan Statistical Area (MSA) and both Brunswick County and Leon County are MSAs. Both the Georgia and Florida AAs were selected for full-scope reviews. There are no limited-scope AAs for this evaluation. Community profiles for the AAs are provided in the "Scope" sections for the States of Georgia and Florida.

Refer to appendix A, Scope of Examination, for more information regarding the full-scope review of the bank's AAs.

Ratings

The bank's overall rating is a blend of the state ratings for Georgia and Florida. Equal weight was given to the bank's primary loan products: small business loans and home mortgage loans. With 22 census tracts (CTs) in the two Georgia AAs and 79 CTs in the Florida AA, the lending analysis takes into consideration all the data for the bank's primary loan products.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Georgia

CRA rating for the State of Georgia¹: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the AAs.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels in the AAs.
- The bank exhibits adequate responsiveness to CD needs in the AAs through CD activities.

Description of Institution's Operations in Georgia

TNB has delineated two AAs in the state of Georgia which includes the Thomasville non-MSA-Micropolitan Statistical Area, and the St. Simons, Brunswick MSA.

The bank's Thomasville AA consists of Thomas County. The St. Simon Island AA consists of Glynn County. According to June 30, 2022, FDIC Summary of Deposit information, TNB operated three

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

branches and two non-deposit taking automated teller machines (ATMs) in the state of Georgia. The bank operates night depositories at its Thomasville branches and the St. Simons branch. Based upon June 30, 2022, deposit market share information, TNB's deposits in Georgia totaled \$1.2 billion.

In this evaluation, the Thomasville AA, and St. Simons AA, will receive full-scope reviews since the bank's operations in the AAs was consistent throughout the entire three-year evaluation period.

Thomas County

TNB has two branches in Thomasville, Thomas County, Georgia non-MSA. The ATMs at the branches are not deposit taking. The total dollar volume of deposits is \$1.1 billion, which is 56.1 percent share in the Thomas County, GA market. The majority of the bank's deposits are located in the Thomas County, GA AA, representing 78.0 percent of the bank's total deposits.

According to the 2020 U. S. Census and Dun and Bradstreet data, the Thomas County AA consists of 14 CTs: zero low-, one moderate-, eight middle-, and five upper-income CTs. The population of the Thomas County AA was 45,798 with 12,289 families according to the 2020 U.S. Census data. Approximately 22.4 percent of the families in the AA are low-income and 14.7 percent are moderate-income. Approximately 14.5 percent of the families live below the poverty line. The median family income in the AA is \$55,969 for the evaluation period.

Thomas County, GA is located in southwest Georgia bordering the state of Florida. Thomas County is a thinly populated, largely rural area. Thomasville, GA, the county seat, and largest municipality, is located approximately 25 miles north of Tallahassee, Florida, and 40 miles west of Valdosta, Georgia. The Georgia Department of Labor shows that as of December 2022, the unemployment rate in Thomas County was 3.1 percent, equivalent to the unemployment for the state of Georgia. Thomasville is home to several large employers such as Flowers Food, Blue Bell Ice Cream, Centek Industries, Oiln International, and John D. Archibold Memorial Hospital.

TNB's competition is from other financial institutions and financial services providers within its AA. Overall, TNB ranks first in total deposits out of the FDIC-insured financial institutions operating in the Thomas County AA. There are five competitor banks in the bank's Thomas County AA, with a combined eight branch offices. Among the competitor banks in the AA, four are much larger than TNB with respect to branch networks, total deposits, and asset size. There is one similarly situated bank in Thomasville AA. As of December 31, 2022, the top three banks based on total deposits in Thomas County were Thomasville National Bank (\$1 billion), Synovus Bank (\$363 million), and TC Federal Bank (\$243 million).

Table A – Demographic Information of the Assessment Area						
Assessment Area: Thomas County AA (Non-MSA)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	7.1	57.1	35.7	0.0
Population by Geography	45,798	0.0	2.9	57.5	39.6	0.0
Housing Units by Geography	20,782	0.0	2.9	58.0	39.1	0.0
Owner-Occupied Units by Geography	11,054	0.0	2.8	51.3	45.9	0.0
Occupied Rental Units by Geography	6,696	0.0	2.9	67.3	29.8	0.0
Vacant Units by Geography	3,032	0.0	3.3	61.7	35.0	0.0
Businesses by Geography	5,952	0.0	1.2	65.6	33.1	0.0
Farms by Geography	313	0.0	3.2	52.4	44.4	0.0
Household Distribution by Income Level	17,750	21.3	18.6	14.5	45.6	0.0
Median Family Income Non-MSAs - GA		\$55,969	Median Housing Value			\$143,660
			Median Gross Rent			\$859
			Families Below Poverty Level			14.5%
Family Distribution by Income Level	12,289	22.4	14.7	17.1	45.7	0.0
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The OCC relied upon information from a community contact with a county community development organization focused on affordable housing in low-to-moderate income (LMI) areas. This community contact identified the following needs within the Thomas County AA:

- Affordable Housing.
- Microloans to small businesses particularly to start-up businesses.
- Food access to LMI individuals and families.
- Childcare services for LMI families.

Glynn County

TNB has one branch which operates as St. Simons Bank & Trust in the St. Simons, Glynn County, Georgia AA. St. Simons is located in the Brunswick MSA. The bank has no ATMs in the AA, but the branch offers a night depository for deposits after business hours. The total dollar volume of deposits is \$140 million, which represented 4.5 percent of deposit market share in the Glynn County, GA. The Glynn County AA represents 10.0 percent of the bank's total deposits.

According to the 2020 U. S. Census and Dun and Bradstreet data, the Glynn County AA consists of eight CTs: zero low-, zero moderate-, one middle-, six upper-income, and one non-descript. The population of the Glynn County, GA AA was 16,981 with 5,343 families according to the 2020 U.S. Census data. Approximately 8.0 percent of the families in the AA are low-income and 7.8 percent are moderate-income. Approximately 3.5 percent of the families live below the poverty line. The median family income in the AA is \$68,432 for the evaluation period.

Glynn County is located along the coast in southeast Georgia. Brunswick, GA is the county seat and is

the primary urban and economic center of the lower southeast portion of Georgia. The Georgia Department of Labor shows that as of December 2022, the unemployment rate in Glynn County was 2.7 percent, while the unemployment rate for the state of Georgia was higher at 3.1 percent for the same period. St. Simons Island is a barrier island located midway between Savannah, GA and Jacksonville, FL. It is a seaside resort and a residential community. It is the largest of the Georgia's Golden Isles. The area's economy is driven by tourism on the island and the port in Glynn County.

According to Moody's Analytics data, the primary industries in the AA include government, education and health services, leisure, and hospitality services. The Brunswick AA is home to several large employers such as Southeast Georgia Health System, Sea Island Company, Federal Law Enforcement Training Center (FLETC), Brunswick Cellulose, Inc. and Walmart, Inc.

TNB's competition is from other financial institutions and financial services providers within its AA. Overall, TNB ranks eight in total deposits out of the FDIC-insured financial institutions operating in the Glynn County AA. Among the competitor banks in the AA, eight are much larger than TNB with respect to branch networks, total deposits, and asset size. There is one similarly situated bank in this AA. Besides TNB, 12 FDIC-insured financial institutions have 31 branch locations throughout Glynn County. As of December 31, 2022, the top three banks based on total deposits in Glynn County were Truist Bank (\$723 million), Ameris Bank (\$406 million), and Synovus Bank (\$367 million).

Table A – Demographic Information of the Assessment Area						
Assessment Area: Glynn County MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	0.0	12.5	75.0	12.5
Population by Geography	16,981	0.0	0.0	7.1	85.5	7.4
Housing Units by Geography	13,213	0.0	0.0	18.0	75.8	6.2
Owner-Occupied Units by Geography	6,313	0.0	0.0	9.3	84.7	6.0
Occupied Rental Units by Geography	1,471	0.0	0.0	12.0	82.2	5.8
Vacant Units by Geography	5,429	0.0	0.0	29.8	63.8	6.4
Businesses by Geography	4,421	0.0	0.0	13.4	76.6	9.9
Farms by Geography	91	0.0	0.0	7.7	80.2	12.1
Household Distribution by Income Level	7,784	10.3	7.6	15.8	66.4	0.0
Median Family Income MSA - 15260 Brunswick, GA MSA		\$68,432	Median Housing Value			\$396,460
			Median Gross Rent			\$1,316
			Families Below Poverty Level			3.5%
Family Distribution by Income Level	5,343	8.0	7.8	13.7	70.5	0.0
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The OCC relied upon information from a community contact with a local government official in the Glynn County AA. This community contact identified the following needs within the bank's AA:

- Affordable Housing.
- Technical assistance for small businesses.

- Small business startup assistance.
- Enhanced Community Services – medical services and access to public transportation.

Scope of Evaluation in Georgia

The OCC conducted full-scope reviews for the Thomas County and Glynn County AAs in the state of Georgia. There were no limited scope AA reviews in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

The bank's performance under the Lending Test in Georgia is rated Satisfactory.

Based on full-scope reviews, the bank's performance in the state of Georgia is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Thomas County

The geographic distribution of home mortgage loans is reasonable. There are no low-income CTs in Thomas County. During 2020 and 2021, the geographic distribution of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied housing but exceeded aggregate lending performance in the AA. In 2022, the bank's lending in moderate-income CTs was significantly below both the percentage of owner-occupied housing and aggregate lending performance in the AA at less than one percent.

Glynn County

Since there are no low- and moderate-income CTs in the Glynn County AA, a meaningful geographic distribution analysis cannot be performed for the AA.

Small Loans to Businesses

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Thomas County

TNB exhibits a reasonable geographic distribution of small business loans in the Thomas County AA. There are no low-income CTs in the Thomas County AA. In the 2020 – 2021 analysis, the percentage of

small loans to businesses originated or purchased in moderate-income CTs significantly exceeded both the demographic and the aggregate performance data. In the 2022 analysis, the percentage of small loans to businesses originated or purchased in moderate-income was below both the demographic and the aggregate performance data.

Glynn County

Since there are no low- and moderate-income census CTs in the Glynn County AA, a meaningful geographic distribution analysis cannot be performed in the AA.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Thomas County

The distribution of home mortgage loans to borrowers of different income levels is reasonable. During 2020 and 2021, the distribution of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending performance in the AA. The distribution of loans to moderate-income borrowers was below the percentage of moderate-income families but exceeded aggregate lending performance in the AA. During 2022, the distribution of loans to low-income borrowers was significantly below the percentage of low-income families but exceeded aggregate lending performance in the AA. The distribution of loans to moderate-income borrowers was below both the percentage of moderate-income families and aggregate lending performance in the AA. Approximately, 40 percent of families in the AA report low- or moderate-income.

In assessing borrower income distribution, the OCC considered housing affordability. The AA is a moderate cost housing area which may limit access to affordable home ownership among LMI borrowers. The 2022 Dun & Bradstreet median family income (MFI) in the AA is \$55,969, while the median housing value in the AA is \$143,660. In the Thomas County AA there are 20,782 total housing units in which approximately 11,000 are owner occupied and 7,000 are rental occupied. There are approximately 3,000 vacant housing units in the AA.

Glynn County

The distribution of home mortgage loans to individuals of different income levels is poor. During 2020-2021, TNB's level of home mortgage loans to low-income borrowers was significantly below the

percentage of low-income families but exceeded the aggregate lending performance. However, the aggregate performance was low at approximately one percent. During 2022, with no loans to low-income borrowers the distribution of loans is below both the percentage of low-income families and aggregate lending performance in the AA. During the evaluation period, with no loans to moderate-income borrowers the distribution of loans is below both the percentage of moderate-income families and aggregate lending performance in the AA. Approximately, 16.0 percent of families in the AA reported low- or moderate-income.

In assessing borrower income distribution, the OCC considered housing affordability. The AA is a high-cost housing area which may limit access to affordable home ownership among LMI borrowers. The 2022 Dun & Bradstreet MFI in the AA is \$68,432, while the median housing value in the AA is \$396,460. In the Glynn County AA there are 13,213 total housing units in which approximately 6,000 are owner occupied and 1,000 are rental occupied. There are approximately 5,000 vacant housing units in the AA.

Small Loans to Businesses

Refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Thomas County

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

Glynn County

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Georgia is rated Satisfactory.

Based on full-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, grants, and donations, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Thomas County	266	95.7	15.3	92.2
Glynn County	12	4.3	1.3	7.8
Total	278	100.0	16.6	100.00

Thomas County

TNB's CD loans represent adequate responsiveness to CD needs given the bank's size, and capacity to provide such loans along with other performance context factors. During the evaluation period, the bank originated four qualified CD loans totaling \$1.6 million, to a nonprofit organization that works to construct community structures in low- and moderate-income areas and rehabilitate homes for LMI individuals within the Thomas County, Georgia AA. During the COVID-19 pandemic, the bank originated 262 Paycheck Protection Program (PPP) loans totaling approximately \$13.7 million to address the needs of small businesses in the Thomas County AA.

Glynn County

The level of CD loans reflects poor responsiveness to CD needs in the AA. The bank did not originate any CD loans in the Glynn County AA during the evaluation period. During the COVID-19 pandemic, the bank originated 12 PPP loans totaling approximately \$1.3 million to address the needs of small businesses in the Glynn County AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Thomas County	0	0.0	60	145.0	60	98.4	145.0	98.6	0	0.0
Glynn County	0	0.0	1	2.0	1	1.6	2.0	1.4	0	0.0
Total	0	0.0	61	147	61	100	147.0	100	0	0.0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

TNB's qualified donations represent adequate responsiveness to CD needs in the AAs given the bank's size, and capacity to provide such loans along with other performance context factors. During the evaluation period, there were no qualifying investments. During the current evaluation period, the bank made 61 qualified donations totaling \$147,250 within the state of Georgia AAs. The bank provided one qualifying donation of \$1,000 to an organization in another state. There were no prior period investments to consider for the evaluation.

Thomas County

TNB demonstrates adequate responsiveness to CD needs through qualified donations. During the current evaluation period, the bank made 60 qualified donations totaling \$145,250, to organization which provide various social services for low-income and moderate-income individuals in the AA. The services include assistance for local shelters, affordable housing agencies and assistances to individuals with disabilities.

Glynn County

The level of CD loans reflects poor responsiveness to CD needs in the AA. The bank made one CD qualifying donation of \$2,000 in the Glynn County AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

CD services demonstrate adequate responsiveness to CD needs in the AA, given the bank's size and the capacity to provide such services. During the evaluation period, five bank employees conducted 38 activities, providing 542 hours of CD services in the state of Georgia.

The bank's CD service performance takes into consideration the impact of the COVID-19 pandemic. During the evaluation period, government mandates limited in-person activities with the AAs residents and businesses, which impacted the bank's ability to perform CD services.

Responses to Complaints

TNB has not received any complaints about its performance in helping to meet the Thomas and Glynn Counties AAs credit needs during the evaluation period.

State Rating

State of Florida

CRA rating for the State of Florida²: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans in low- and moderate-income geographies.
- The bank exhibits a reasonable distribution of lending to borrowers of different income and businesses of different sizes.
- The bank exhibits very poor responsiveness to CD needs in the AA through CD activities.

Description of Institution's Operations in Florida

TNB has one full-service branch in Florida, which operates as Tallahassee National Bank. The branch is located in the Leon County, Tallahassee, FL MSA. The bank does not have any ATMs in the AA but offers a night depository for deposits after business hours. The total dollar volume of deposits is \$168 million, which is 1.6 percent of the deposit market share in the Leon County, FL. There is one similarly situated bank in the Leon County AA.

According to the 2020 U. S. Census and Dun and Bradstreet data, the Leon County, FL AA consists of 79 CTs: 13 low-, 14 moderate-, 22 middle-, 25 upper-income and 5 non-descript. The Leon County, FL AA has a population of 292,198 with 61,961 families according to the 2020 U. S. Census Data. Approximately 21.0 percent of the families in the AA are low-income and 16.0 percent are moderate-income. Approximately 9.8 percent of the families live below the poverty line. The median family income in the AA is \$72,943.

Leon County, FL is located in the Florida panhandle bordering the state of Georgia. Leon County is densely populated, as it is home to two major public universities: Florida State University and Florida A&M University. Tallahassee is the county seat and the capital of Florida. As of December 2022, the Florida Bureau of Labor Statistics shows the unemployment rate for Leon County, Florida was 2.3 percent, while the unemployment rate for the state of Florida was higher at 2.7 percent.

According to Moody's Analytics data, the primary industries in the AA include: education, health services, manufacturing, professional services, business services, leisure, and hospitality services. The Tallahassee AA is home to several large employers such as Florida State University, Tallahassee Memorial Healthcare, Inc., and Florida A & M University.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

In Leon County, FL, TNB's competition is from other financial institutions and mortgage loan providers within its AA. Overall, TNB ranks 12th in total deposits out of the FDIC-insured financial institutions operating in the Leon County AA. Besides TNB, 16 FDIC-insured financial intuitions have 74 branches. As of December 31, 2022, the top three banks based on total deposits in Leon County were Wells Fargo, NA (\$2.0 billion), Capital City Bank (\$1.8 billion), and Bank of America (\$1.3 billion).

Table A – Demographic Information of the Assessment Area						
Assessment Area: Leon County MSA AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	79	16.5	17.7	27.8	31.6	6.3
Population by Geography	292,198	14.4	17.6	29.6	32.4	6.0
Housing Units by Geography	131,341	15.8	18.8	33.0	30.0	2.4
Owner-Occupied Units by Geography	61,283	4.6	12.1	33.3	50.0	0.0
Occupied Rental Units by Geography	55,247	25.5	25.6	32.9	11.7	4.4
Vacant Units by Geography	14,811	26.6	21.2	32.2	15.3	4.7
Businesses by Geography	55,177	8.7	15.4	39.1	34.4	2.3
Farms by Geography	1,407	5.6	12.9	37.2	43.6	0.6
Household Distribution by Income Level	116,530	24.9	15.3	16.6	43.2	0.0
Median Family Income – MSA 45220 Tallahassee MSA		\$72,943	Median Housing Value			\$185,527
			Median Gross Rent			\$1,026
			Families Below Poverty Level			9.8%
Family Distribution by Income Level	61,961	20.7	15.7	18.8	44.8	0.0
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The OCC relied upon information from a community contact with a local government official in the Leon County AA. This community contact identified the following needs within the bank's AA:

- Workforce development for LMI individuals.
- Small business lending and technical assistance.
- Transitional and affordable housing needs.
- Credit counseling services for LMI individuals.

Scope of Evaluation in Florida

The OCC conducted full-scope reviews for the Tallahassee AA in the state of Florida. There were no limited scope AA reviews in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Satisfactory.

Based on a full-scope review, the bank's performance in the state of Florida is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the AA is excellent. During 2020 and 2021, the bank's level of home mortgage loans to borrowers in low-income geographies significantly exceeded both the percentage of owner-occupied housing units and the aggregate lending performance. The bank's level of home mortgage loans to borrowers in moderate-income geographies is near to the demographic data and equal to the aggregate lending performance. During 2022, the bank's level of home mortgage loans to borrowers in low-income geographies exceeded both the demographic data and the aggregate lending performance. The bank's level of home mortgage loans to borrowers in moderate-income geographies exceeded both the demographic data and the aggregate lending performance.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in the AA is poor. During 2020 and 2021, TNB did not originate any small loans to businesses in low-income geographies. However, less than 10 percent of businesses were in low-income CTs. TNB's distribution of small loans to businesses in moderate-income geographies exceeded both the number of small businesses and the aggregate lending performance. During 2022, the bank did not originate small loans to businesses in low- or moderate-income geographies. Approximately, 24 percent of small business were in low- and moderate-income CTs.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to individuals of different income levels in the AA is poor. During 2020-2021, TNB's level of home mortgage loans to low-income borrowers were significantly below the percentage of low-income families and below the aggregate lending performance. The bank's level of home mortgage loans to moderate-income borrowers was significantly below both the demographic data and the aggregate lending performance. During 2022, TNB's level of home mortgage loans to low-income borrowers were significantly below the percentage of low-income families and below the aggregate lending performance. The bank's level of home mortgage loans to moderate-income borrowers was significantly below both the demographic data and the aggregate lending performance. Approximately, 37 percent of families in the AA report low- or moderate-income.

In assessing borrower income distribution, the OCC considered housing affordability. The AA is a moderate cost housing area which may limit access to affordable home ownership among LMI borrowers. The 2022 Dun & Bradstreet MFI in the AA is \$72,943, while the median housing value in the AA is \$185,527. In the AA there are 125,915 total housing units in which approximately 58,000 are owner occupied and 53,000 are rental occupied. There are approximately 15,000 vacant housing units in the AA.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Florida is rated Needs to Improve.

Based on a full-scope reviews, the bank exhibits poor responsiveness to CD needs in the state through CD loans, qualified investments, grants, and donations, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Leon County	168	100.0	10.8	100.0

Leon County

The level of CD loans reflects poor responsiveness to community development needs in the AA. The bank did not originate any CD loans in the Leon County AA during the evaluation period. During the COVID-19 pandemic, the bank originated 168 PPP loans totaling approximately \$10.8 million to address the needs of small businesses in the Leon County AA.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Leon County	0	0.0	0	0.0	0	0	0.0	0.0	0	0.0
Total	0	0.0	0	0.0	0	0	0.0	0.0	0	0.0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Leon County

The level of CD loans reflects very poor responsiveness to CD needs in the AA. The bank did not provide any qualifying CD investments or donations in the Leon County AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

CD services demonstrate poor responsiveness to CD needs in the AA, given the bank's size and the capacity to provide such services. During the evaluation period, three bank employees conducted two activities, providing 18 hours of CD services in the state of Florida.

The bank's CD service performance takes into consideration the impact of the COVID-19 pandemic. During the evaluation period, government mandates limited in-person activities with AA residents and businesses, which impacted the bank's ability to perform CD services.

Responses to Complaints

TNB has not received any complaints about its performance in helping to meet the Leon County AA credit needs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period reviewed in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	(01/01/2020 to 12/31/2022)	
Bank Products Reviewed:	(Home mortgage, small business) (Community development loans, qualified investments, community development services)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State: Georgia		
Non-MSA Thomas County	Full-Scope	Thomasville, GA
Glynn, County, Brunswick MSA	Full-Scope	St, Simons Island, GA
Leon County, Tallahassee MSA	Full-Scope	Tallahassee, FL

Appendix B: Summary of State Ratings

RATINGS Thomasville National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
Thomasville National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Georgia	Satisfactory	Satisfactory	Satisfactory
Florida	Satisfactory	Needs Improvement	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000)

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

to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2020-21		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
St Simons Island GA AA 2021	34	34,744	7.6	2,047	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Tallahassee FL 2021	105	36,643	23.5	12,086	5.0	21.9	4.3	14.3	12.4	12.2	30.7	29.5	30.7	49.2	33.3	51.6	0.8	2.9	1.1
Thomasville GA 2021	307	64,561	68.8	1,634	0.0	0.0	0.0	26.1	24.8	22.4	63.1	68.7	68.1	10.8	6.5	9.5	0.0	0.0	0.0
Total	446	135,948	100.0	15,767	4.0	5.2	3.3	14.9	20.0	11.7	33.1	54.3	30.6	47.4	20.0	53.5	0.6	0.7	0.9
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022	
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
St Simmons Island GA AA 2022	14	16,264	5.5	1,013	0.0	0.0	0.0	0.0	0.0	0.0	9.3	14.3	12.0	84.7	85.7	77.9	6.0	0.0	10.1
Tallahassee FL AA 2022	85	23,156	33.3	7,325	4.6	12.9	5.9	12.1	17.6	14.6	33.3	41.2	36.5	50.0	25.9	42.6	0.0	2.4	0.4
Thomasville GA AA	156	29,367	61.2	1,100	0.0	0.0	0.0	2.8	0.6	1.5	51.3	58.3	55.5	45.9	41.0	43.0	0.0	0.0	0.0
Total	255	68,787	100.0	9,438	3.6	4.3	4.5	9.9	6.3	11.5	33.9	50.2	36.1	52.2	38.4	46.5	0.5	0.8	1.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-21		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St Simons Island GA AA 2021	34	34,744	7.6	2,047	7.4	2.9	0.9	7.7	0.0	6.2	14.5	2.9	12.2	70.5	35.3	67.0	0.0	58.8	13.7
Tallahassee FL 2021	105	36,643	23.5	12,086	21.1	1.0	6.2	15.6	3.8	17.8	18.4	7.6	20.4	45.0	44.8	40.0	0.0	42.9	15.7
Thomasville GA 2021	307	64,561	68.8	1,634	23.8	2.3	1.4	16.7	10.7	9.4	19.3	13.4	18.7	40.2	35.5	49.1	0.0	38.1	21.4
Total	446	135,948	100.0	15,767	20.7	2.0	5.0	15.3	8.3	15.4	18.3	11.2	19.1	45.8	37.7	44.4	0.0	40.8	16.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St Simmons Island GA AA 2022	14	16,264	5.5	1,013	8.0	0.0	1.6	7.8	0.0	4.1	13.7	0.0	10.9	70.5	57.1	68.4	0.0	42.9	15.0
Tallahassee FL AA 2022	85	23,156	33.3	7,325	20.7	2.4	6.7	15.7	7.1	18.9	18.8	8.2	19.7	44.8	30.6	37.9	0.0	51.8	16.8
Thomasville GA AA 2022	156	29,367	61.2	1,100	22.4	5.8	4.7	14.7	7.7	12.2	17.1	12.8	19.3	45.7	42.9	42.7	0.0	30.8	21.1
Total	255	68,787	100.0	9,438	20.1	4.3	5.9	15.1	7.1	16.5	18.2	10.6	18.7	46.6	39.6	41.7	0.0	38.4	17.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21																			
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
St Simons Island GA AA 2021	10	4,271	31.9	988	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	60.0	100.0	0.0	0.0	0.0
Tallahassee FL 2021	13	5,899	44.2	7,790	9.2	0.0	8.3	21.0	30.77	23.2	33.0	30.77	33.4	35.1	38.5	34.2	1.8	0.0	0.8
Thomasville GA 2021	11	3,193	23.9	1,099	0.0	0.0	0.0	32.6	54.5	30.4	61.0	27.3	62.7	6.4	18.2	6.9	0.0	0.0	0.0
Total	34	13,353	100.0	9,877	7.8	0.0	6.6	20.6	93.6	21.7	33.2	58.1	33.3	36.9	113.7	37.8	1.5	0.0	0.6
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022																			
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
St Simmons Island GA AA 2022	10	2,619	38.4	936	0.0	0.0	0.0	0.0	0.0	0.0	13.4	20.0	13.7	76.6	80.0	76.6	9.9	0.0	9.7
Tallahassee FL AA 2022	7	2,213	32.4	7,152	8.7	0.0	7.3	15.4	0.0	13.7	39.1	71.4	41.1	34.4	28.6	36.5	2.3	--	1.5
Thomasville GA AA 2022	9	1,992	29.2	1,012	0.0	0.0	0.0	1.2	0.0	1.4	65.6	77.8	61.1	33.1	22.2	37.5	0.0	0.0	0.0
Total	26	6,824	100.0	9,100	7.4	0.0	5.7	13.1	0.0	10.9	39.8	56.4	40.5	37.2	43.6	40.7	2.6	0.0	2.1
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-21
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St Simons Island GA AA 2021	10	5,929	39.4	988	93.0	100.0	44.7	2.0	0.0	5.1	0.0
Tallahassee FL 2021	13	5,899	44.2	7,790	90.6	100.0	45.5	2.4	0.0	7.0	0.0
Thomasville GA 2021	11	3,193	23.9	1,099	86.2	100.0	47.9	4.1	0.0	9.7	0.0
Total	34	15,021	100.0	9,877	90.4	100.0	45.7	2.5	0.0	7.1	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St Simmons Island GA AA 2022	10	2,619	38.4	936	93.8	100.0	46.3	1.7	0.0	4.6	0.0
Tallahassee FL AA 2022	7	2,213	32.4	7,152	91.7	100.0	50.3	2.0	0.0	6.3	0.0
Thomasville GA AA 2022	9	1,992	29.2	1,012	88.4	100.0	54.2	3.3	0.0	8.2	0.0
Total	26	6,824	100.0	9,100	91.6	100.0	50.3	2.1	0.0	6.3	0.0
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

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



Thomasville National Bank

BANK BRANCHES with STREET ADDRESSES and GEOGRAPHIES

Thomasville National Bank (Main Office):

301 North Broad Street
Thomasville, GA 31792
Census Tract: 9607.02, Thomas County, Georgia

Thomasville National Bank Branches:

1320 Remington Avenue
Thomasville, GA 31792
Census Tract: 9606.02, Thomas County, Georgia

St. Simons Bank & Trust, a Division of Thomasville National Bank
100 Island Professional Park
St. Simons Island, GA 31522
Census Tract: 0002.01, Glynn County, Georgia

Tallahassee National Bank, a Division of Thomasville National Bank
1300 Metropolitan Boulevard
Tallahassee, FL 32308
Census Tract 0017.02, Leon County, Florida

HOURS OF OPERATION

Monday – Thursday	8:30 am – 4:00 pm	Main Office and Remington Avenue Office St. Simons Bank & Trust Office and Tallahassee National Bank
	9:00 am – 4:00 pm	
Friday	8:30 am – 5:30 pm	Main Office and Remington Avenue Office St. Simons Bank & Trust Office and Tallahassee National Bank
	9:00 am – 5:00 pm	
Saturday	9:00 am – 12:00 pm	Remington Avenue Office

Both Thomasville offices have on-site ATMs, however, the ATMs do not accept deposits. St. Simons Bank & Trust and Tallahassee National Bank do not have an ATM. A night depository is available at both offices in Thomasville and the office in St. Simons for customers that wish to make a deposit after business hours.



Thomasville National Bank

BRANCHES OPENED

In the current year: NONE

During the prior two years: NONE

BRANCHES CLOSED

Thomasville National Bank has not closed any branches in the current year, or the prior two years.



Thomasville National Bank

HOURS OF OPERATION

Monday – Thursday	8:30 am – 4:00 pm 9:00 am – 4:00 pm	Main Office and Remington Avenue Office St. Simons Bank & Trust Office and Tallahassee National Bank
Friday	8:30 am – 5:30 pm 9:00 am – 5:00 pm	Main Office and Remington Avenue Office St. Simons Bank & Trust Office and Tallahassee National Bank
Saturday	9:00 am – 12:00 pm	Remington Avenue Office

Both Thomasville offices have on-site ATMs, however, the ATMs do not accept deposits. St. Simons Bank & Trust and Tallahassee National Bank do not have an ATM. A night depository is available at both offices in Thomasville and the office in St. Simons for customers that wish to deposit after business hours.

LOAN PRODUCTS AND SERVICES

In order to promote the welfare and service the banking needs of the Bank's local community, the Board of Directors has specified to management that the following specific credit products be made available within the parameters of prudent and sound lending guidelines:

Commercial Loans

- Working Capital
- Purchase of Equipment
- Purchase of Inventory
- Purchase of Real Estate, 1st DSD
- Immediate and long-term financing of loans guaranteed by the Small Business Administration
- Small Business Loans
- Community Development
- Agriculture Loans

Consumer Loans

- Purchase of Consumer Goods
- Purchase of Motor Vehicles

- Home Improvement Loans
- Personal Loans
- First Mortgage Residential Real Estate Loans
- Second Mortgage Residential Real Estate Loans
- Home Equity Loans
- Personal Lines of Credit

DEPOSIT PRODUCTS AND SERVICES

Personal Checking Accounts

	Simple Checking	Personal Interest Checking	Crown Interest Checking (50+)
Interest Rate	--	Variable	Variable
Online Banking	X	X	X
Bill Pay	X	X	X
Mobile Banking	X	X	X
Account Alerts	X	X	X
E-Statements	X	X	X
Maintain: Minimum Balance or Average Daily Balance	Minimum \$500 Average \$1,000	Minimum \$750 Average \$1,500	No service charge
Service Charge if Below	\$8.00	\$8.00 plus \$0.20 per check/debit	
Discount For: Full-time Students Age 18-24	No service charge	NA	NA
Transactions	Unlimited	Unlimited	Unlimited
Amount to Open	\$100	\$100	\$100
Safe Deposit Box Rental	Varies by size	Varies by size	Varies by size

Savings Accounts

	Personal Gold Investment Money Market	Personal Savings
Interest Rate	Variable	Variable
Online Banking	X	X
Mobile Banking	X	X
Account Alerts	X	X
E-Statements	X	X
Maintain: Minimum Balance	Minimum \$1,000	Minimum \$100
Service Charge if Below	\$8.00	\$5.00
Withdrawal Limits	Please ask us for the withdrawal limits for this account	3 per quarter \$2.00 fee for each withdrawal exceeding the limit.
Amount to Open	\$1,000	\$100
Safe Deposit Box Rental	Varies by size	Varies by size

Personal Certificates of Deposit (CD)

TNB offers competitive interest rates on a variety of CD terms from seven days to seven years.

Individual Retirement Accounts (IRA)

TNB offers Traditional, Roth, SEP and Education IRAs with no maintenance fee.

Business Checking

	Small Business Checking	Business Analysis Checking	Business NOW Checking
Interest Rate	NA	NA	Variable
Online & Mobile Banking	X	X	X
Alerts & E-Statements	X	X	X
Maintain: Minimum Balance or Average Daily Balance	Minimum \$1,000 Average \$2,500	Balance provides an earnings credit towards analysis fee	Minimum \$1,000 Average \$2,500
Service Charge if Below	\$10.00		\$8.00
Activity Based fees: Number of debit items	First 50 are free, then \$0.20 per debit	See Fee Schedule	NA
Amount to Open	\$100	\$100	\$100
Safe Deposit Rental	Varies by size	Varies by size	Varies by size

Business Analysis Fee Schedule	
Deposits	No Charge
Items Deposited	\$0.07 each
Items Paid	\$0.14 each
Stop Payments	\$30.00 each
Domestic Wire Transfers (In/Out)	\$12.00
Monthly Account Maintenance	\$8.00
Deposited Checks Returned	\$2.00 each
FDIC Insurance	No Charge
Special Services	Varies by Service
Earnings Credit	Varies

Business Savings

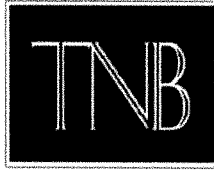
	Business Gold Investment Money Market	Business Savings
Interest Rate	Variable	Variable
Online & Mobile Banking	X	X
Alerts & E-Statements	X	X
Maintain: Minimum Balance	Minimum \$1,000	Minimum \$100
Service Charge if Below	8.00	\$5.00
Withdrawal Limits	Please ask us for the withdrawal limits for this account	3 per quarter, \$5.00 fee for each withdrawal exceeding the limit
Amount to Open	\$1,000	\$100
Safe Deposit Rental	Varies by size	Varies by size

Business Certificates of Deposit (CD)

TNB offers competitive interest rates on a varied of CD terms from seven days to seven years.

TNB Financial Services

We are proud to offer local investment services to fit our current business needs and as you plan for the future. Allow us to introduce you to our investment team at TNB Financial Services.



Thomasville National Bank

ASSESSMENT AREAS

Thomasville National Bank has selected: Thomas County, Georgia; Saint Simons Island, Georgia; and Leon County, Florida as its assessment areas.

THOMAS COUNTY, GEORGIA consists of the following Census Tracts:

Census Tract Nos.
9601.00
9602.00
9603.00
9604.00
9605.01
9605.02
9606.01
9606.02
9607.01
9607.02
9608.00
9609.00
9610.00
9611.00

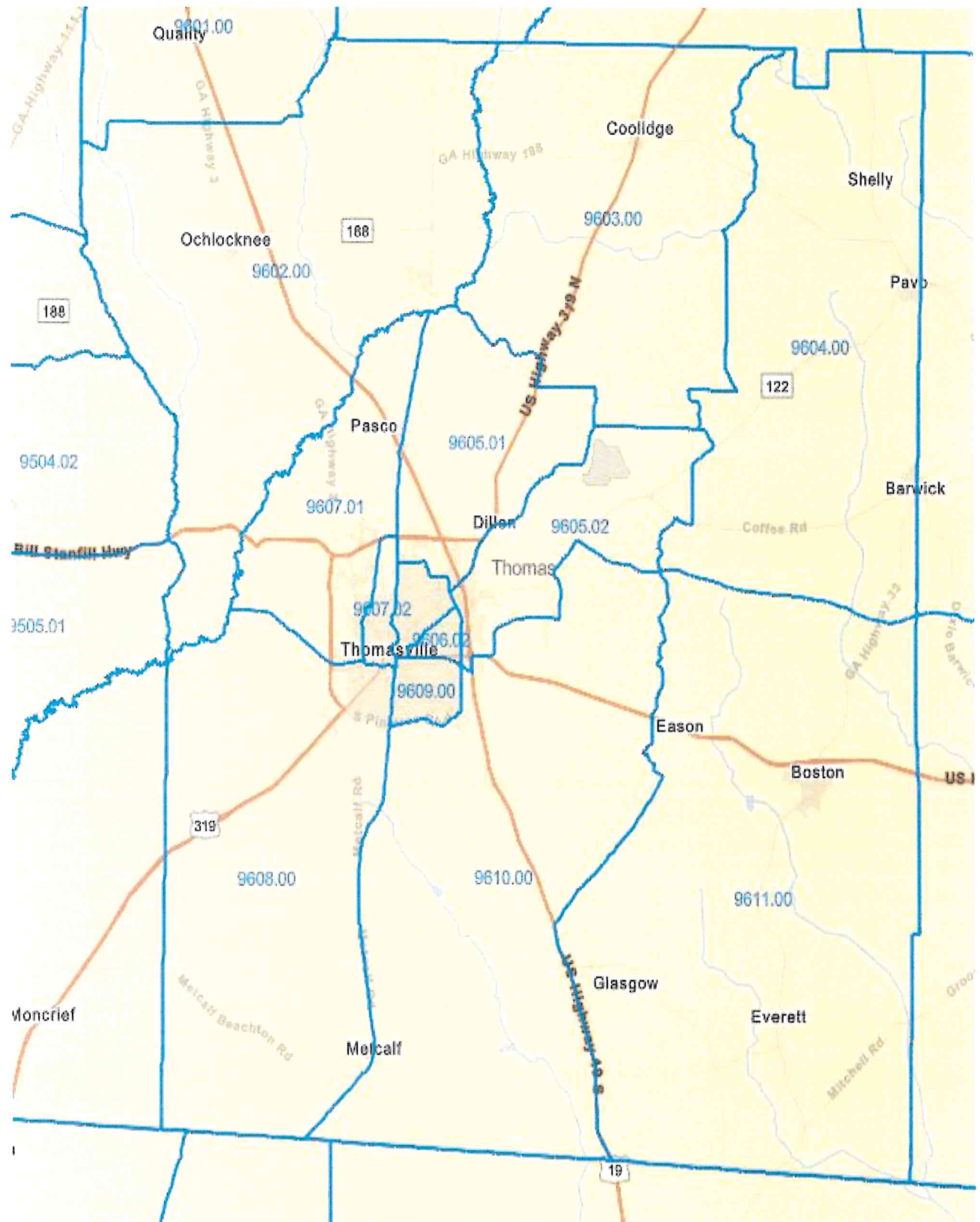
ST. SIMONS ISLAND, GEORGIA consists of the following Census Tracts (*Census-designated Place-CDP*)

Census Tract Nos.
0001.01
0001.03
0001.04
0002.01
0002.02
0003.01
0003.02
0003.03

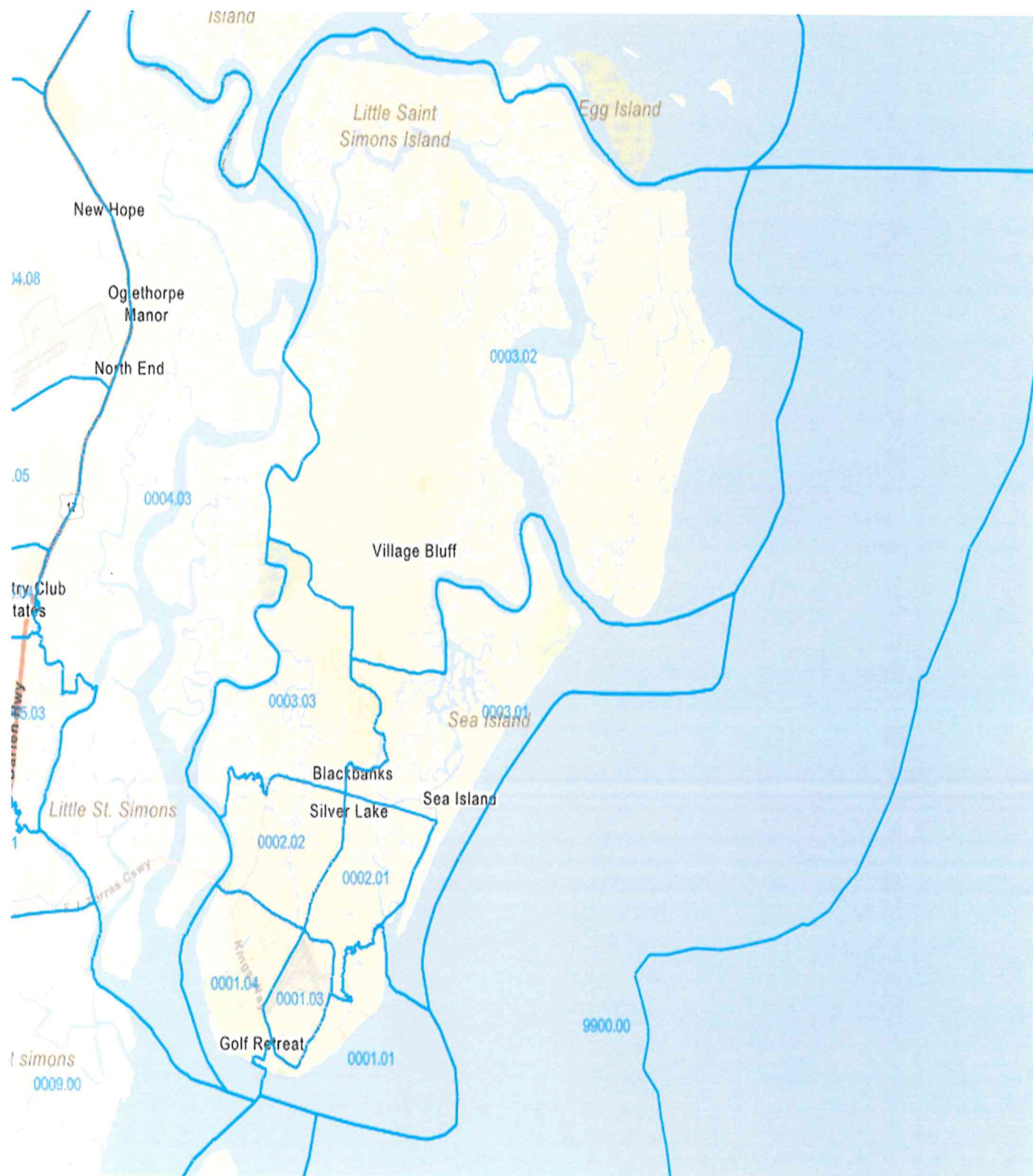
LEON COUNTY, FLORIDA consists of the following Census Tracts:

Census Tract Nos.	
0002.00	0022.05
0003.01	0022.06
0003.02	0022.07
0003.03	0022.08
0004.00	0023.02
0005.01	0023.03
0005.02	0023.04
0006.00	0024.03
0007.00	0024.10
0008.00	0024.11
0009.03	0024.13
0009.04	0024.14
0009.05	0024.15
0009.06	0024.16
0009.07	0024.18
0010.01	0024.19
0010.02	0024.20
0011.01	0024.21
0011.02	0024.22
0012.00	0024.23
0013.00	0025.05
0014.01	0025.07
0014.02	0025.09
0015.00	0025.11
0016.01	0025.12
0016.02	0025.13
0017.00	0025.14
0017.01	0025.15
0018.01	0025.16
0018.03	0025.17
0018.04	0026.03
0019.01	0026.04
0019.02	0026.05
0020.03	0026.06
0020.05	0027.01
0020.06	0027.02
0020.07	
0020.08	
0021.01	
0021.03	
0021.05	
0021.06	
0022.01	

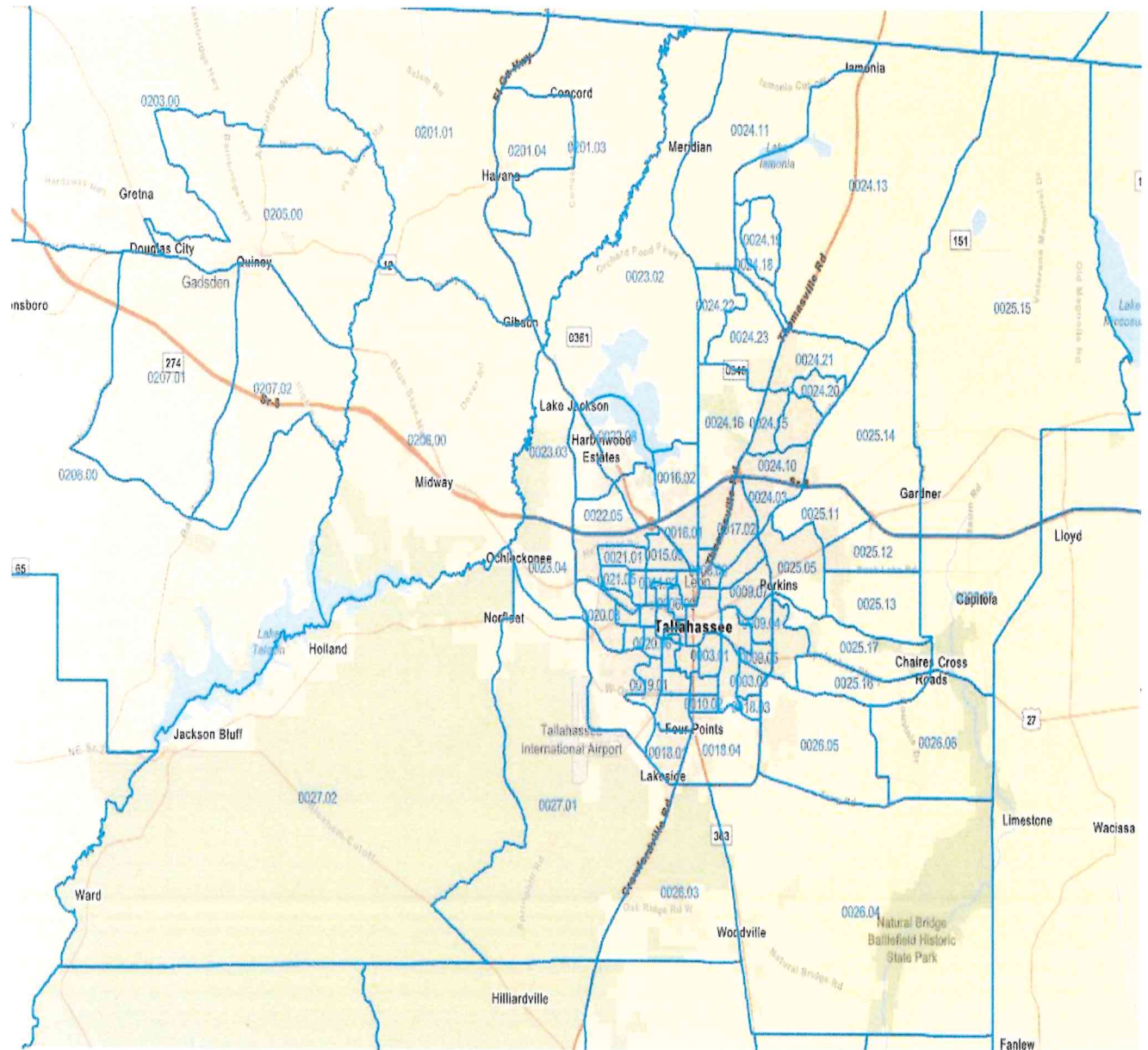
Thomas County, Georgia Census Tracts:



Saint Simons Island, Georgia Census Tracts:



Leon County, Florida Census Tracts:



HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

HMDA data for many other financial institutions are also available at this web site. For more information, visit the Consumer Protection Bureau's website: (www.consumerfinance.gov/hmda).



Thomasville National Bank



Thomasville National Bank

CRA DISCLOSURE STATEMENT

The CRA Disclosure Statement pertaining to the bank, its operations subsidiaries and its other affiliates, may be obtained on the FFIEC's website at: <https://www.ffiec.gov>.