



THE GEO. D. WARTHEN BANK

ESTABLISHED 1871

SANDERSVILLE, GEORGIA

Dear Customers,

Our community is strong because many different cultures, talents, and expectations are woven together. Working side by side, our future will be even stronger.

We are dedicated to meeting your credit needs, whoever you are, whatever your dreams. We will help you get the credit you need. When you need it.

As your financial institution, we are involved in a program that directly affects you and our entire community. Please take a few minutes to learn about the COMMUNITY REINVESTMENT ACT.

The Community Reinvestment Act (CRA) was developed by Congress in 1977. It requires financial institutions to help communities meet local financial needs. To you, our customer, that means: we provide credit services to meet your needs, make many types of loans available, and ask for your suggestions and comments about our credit policies. In addition, we work with community groups, local businesses, and all levels of government to improve the area we serve.

Sincerely,

The Geo. D. Warthen Bank

Keeping Our Community Strong

To serve you well, we regularly analyze our performance as your financial institution; the resulting report is part of our evaluation by CRA examiners.

We gather facts to study: (1) how evenly our credit is distributed throughout the area we serve; (2) how well our products and services meet our customer's needs; (3) is our location and business hours are convenient; and (4) if our officers are readily available to confer with our customers.

Our conclusions guide our Board of Directors and Officers as they plan to improve our policies and services.

Equality Is Our Policy

We are committed to our community. We welcome all who want to apply for a loan, and we grant credit to all who qualify under guidelines set by our Board of Directors.

Our financial institution follows the laws and regulations that protect people from discrimination. We are guided by laws including the Equal Credit Opportunity Act, Fair Lending Act, and Home Mortgage Disclosure Act. We go beyond requirements as we strive to give equal opportunity and advancement to all. As good managers, we reserve the option of not giving credit if we judge it an unsafe banking practice.

PUBLIC DISCLOSURE

September 16, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Geo. D. Warthen Bank
Certificate Number: 2154

216 N. Harris Street
Sandersville, GA 31082

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

10 10th Street NE, Suite 800
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.

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INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- Loan-to-Deposit Ratio – The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and assessment area's credit needs.
- Assessment Area Concentration – A majority of the bank's home mortgage loans and small business loans reviewed originated inside the assessment area.
- Geographic Distribution – A geographic distribution analysis was not conducted because the bank's assessment area does not contain any low- or moderate-income census tracts.
- Borrower Profile – The distribution of borrowers reflects poor penetration among individuals of different income levels and reasonable penetration among businesses of different sizes.
- Response to Complaints – The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test.

DESCRIPTION OF INSTITUTION

Background

The Geo. D. Warthen Bank (GDW) is a state-chartered commercial bank headquartered in Sandersville, Washington County, Georgia, and is not affiliated with a holding company. At the previous CRA performance evaluation conducted by the FDIC, dated November 30, 2015, the bank received a "Satisfactory" CRA rating using the Small Bank CRA Examination Procedures. There have been no mergers or acquisitions since the previous evaluation.

Operations

GDW currently operates one full-service office in its assessment area since the bank closed its limited-service Sandersville office in October 2016. The bank offers a variety of products and services to meet the needs of its community. Consumer credit products include installment loans, personal lines of credit, and one-to-four family residential mortgages. Commercial credit products include commercial real estate loans, equipment loans, construction loans, and commercial lines of credit. In addition, Paycheck Protection Program (PPP) loans were offered in response to the COVID-19 pandemic. PPP loans are guaranteed by the Small Business Administration under the Coronavirus Aid, Relief, and Economic Security Act. The loans serve to retain jobs that would otherwise be lost due to business closures because of the COVID-19 emergency. Deposit products offered include checking, savings, and money market accounts, certificates of deposit. Alternative banking services include internet banking, mobile banking (including mobile deposit), telephone banking, and a bank-owned automated teller machine.

Ability and Capacity

GDW's assets totaled \$222.0 million as of June 30, 2021. Total loans and total deposits were \$112.8 million and \$201.0 million, respectively. Since the previous evaluation, the loan portfolio composition has remained relatively stable and the bank's major product lines are small business, home secured, and unsecured consumer loans. As shown in the following table, loans secured by one-to-four family residential properties comprise 37.8 percent, nonfarm nonresidential properties and commercial and industrial loans comprise 35.5 percent of total loans, and loans to individuals for households comprise of 13.5 percent. Similar to the previous evaluation, the bank's primary focus is to originate small business and home mortgage loans for its community.

Loan Portfolio Distribution as of 6/30/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	6,255	5.6
Secured by Farmland	5,866	5.2
Secured by 1-4 Family Residential Properties	42,583	37.8
Secured by Multifamily (5 or more) Residential Properties	486	0.4
Secured by Nonfarm Nonresidential Properties	17,312	15.4
Total Real Estate Loans	72,502	64.4
Commercial and Industrial Loans	22,720	20.1
Agricultural Production and Other Loans to Farmers	160	0.1
Consumer Loans	15,270	13.5
Obligations Loans	2,149	1.9
Other Loans	15	0.0
Less: Any unearned income on loans	13	0.0
Total Loans	112,803	100.0
<i>Source: Consolidated Reports of Condition and Income (Call Report)</i>		

The bank provides for the credit needs of its community in a manner consistent with its size, financial condition, resources, and local economic conditions. While examiners did not identify any financial or legal impediments that affect the bank's ability to meet the assessment area's credit needs, several economic and demographic indicators could affect the bank's lending opportunities.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its performance will be evaluated. GDW operates within one rated area in the Non-Metropolitan Statistical Area (Non-MSA) of Georgia. The bank's designated assessment area includes all of Washington County. The following section discusses economic and demographic information pertaining to the assessment.

Economic and Demographic Data

The assessment area consists of all five census tracts in Washington County. The assessment area consists of whole census tracts, and does not arbitrarily exclude low- or moderate-income areas.

According to the 2015 American Community Survey (ACS) data, there are four middle-income census tracts and one upper-income census tract. All four of the middle-income census tracts are designated by the Federal Financial Institutions Examination Council (FFIEC) as distressed due to poverty. Since the previous FDIC CRA Performance Evaluation, the one moderate-income census tract changed to a middle-income census tract and one of the middle-income census tracts changed to an upper-income census tract. The following table presents select demographic characters of the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.0	0.0	80.0	20.0	0.0
Population by Geography	20,785	0.0	0.0	91.6	8.4	0.0
Housing Units by Geography	9,040	0.0	0.0	88.8	11.2	0.0
Owner-Occupied Units by Geography	5,049	0.0	0.0	88.2	11.8	0.0
Occupied Rental Units by Geography	2,181	0.0	0.0	91.9	8.1	0.0
Vacant Units by Geography	1,810	0.0	0.0	86.7	13.3	0.0
Businesses by Geography	1,189	0.0	0.0	92.3	7.7	0.0
Farms by Geography	73	0.0	0.0	87.7	12.3	0.0
Family Distribution by Income Level	5,097	24.0	15.2	17.6	43.2	0.0
Household Distribution by Income Level	7,230	27.9	14.8	12.6	44.7	0.0
Median Family Income Non-MSAs - GA		\$45,886	Median Housing Value			\$85,270
			Median Gross Rent			\$560
			Families Below Poverty Level			20.7%

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

The *Geographic Distribution* criterion compares home mortgage loans to the distribution of owner-occupied housing units and small business loans to the businesses located in low-, moderate-, middle-, and upper-income census tracts. As illustrated in the previous table, the assessment area does not have any low- or moderate-income census tracts. Therefore, there is no opportunity for the bank to serve customers in low- or moderate-income census tracts in the bank's defined assessment area.

According to the 2015 ACS data, there were 5,097 families in the assessment area. This includes 20.7 percent of families with incomes below the federal poverty level, which poses a challenge for home mortgage lending to low-income families, as families likely face difficulty in qualifying for a home mortgage loan.

Examiners used FFIEC-updated median family income figures to analyze home mortgage lending under the *Borrower Profile* criterion. The following table reflects low-, moderate-, middle-, and upper-income categories in the assessment area.

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

Based on 2020 Dun and Bradstreet (D&B) data, 1,189 businesses operated in the assessment area. The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue level. The following reflects gross annual revenues for these businesses:

- 79.7 percent had \$1.0 million or less;
- 4.0 percent had more than \$1.0 million; and
- 16.3 percent of businesses did not provide revenues.

According to D&B data, the assessment area's largest industries include services at 31.6 percent, non-classifiable establishments at 18.5 percent, and retail trade at 12.7 percent. Additionally, the Development Authority of Washington County reports that the assessment area's major employers include the Washington County School System, Howard Sheppard Inc., and Burgess Pigment Company.

The following table reflects the average annual unemployment rates and trends for the county, state, and nation. Until 2020, the average unemployment rate in Washington County was above the state and national averages for 2018 and 2019. However, in 2020, the assessment area's unemployment rate fell below the state and national averages.

Area	2018	2019	2020
	%	%	%
Washington County	5.1	4.2	6.4
State of Georgia	4.0	3.5	6.6
National Average	3.9	3.7	8.1

Competition

The market is competitive for financial services. According to FDIC Deposit Market Share data as of June 30, 2020, four financial institutions operated five branches within the assessment area. Of these institutions, GDW ranked first with a deposit market share of 42.0 percent. The two remaining leading financial institutions were Citizens Bank of the South and Queensborough National Bank & Trust Company. These two area leaders accounted for 51.9 percent of the total deposit market share.

Significant competition exists in the assessment area for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to 2020 Peer Mortgage Data, 64 lenders reported a total of 217 originated or purchased home mortgage loans. The top five home mortgage originators (by number of loans) were Quicken Loans, LLC; Queensborough National Bank & Trust; Exchange Bank; Pennymac Loan Services, LLC; and Truist Bank. Collectively, these lending institutions accounted for 40.1 percent of the total market share. Although GDW does not

report home mortgage loans, the data demonstrates the competitive market for home mortgage lending. In addition, in 2019, 26 CRA-reportable institutions originated 230 small business loans in Washington County. This further magnifies the competitive lending market in the assessment area.

Community Contact

Contacts with community organizations are used during CRA evaluations to gain insight regarding the credit needs and economic conditions of the bank's assessment area. Individuals interviewed provide information based on their knowledge and expertise in the housing, business, or economic sectors. This information helps determine whether local financial institutions are responsive to these needs. During this evaluation, an existing community contact was used.

The organization works closely with the business community in the assessment area. The organization's purpose is to provide quality of life through the business community and economic development. The contact stated that in spite of the pandemic, 2020 was a good year for local businesses in the area. During the pandemic, the community relied heavily on local businesses as several major companies were shut down. The contact believes that while the unemployment rate is high, the CARES Act has allowed for employment opportunities. Further, the contact stated that a significant percentage of the population is low-income, and all of the public schools are on the free and reduced lunch program. Lastly, the contact indicated that financial institutions in the area do a great job with responding to the banking and credit needs of the community. However, the contact also noted that financial institutions could help more by assisting with local fundraising and sponsoring various events.

Credit Needs

Based on demographic information and economic data, examiners identified certain credit and community development needs and opportunities within the assessment area. First, the relatively high number of low- and moderate-income families, at 24.0 percent and 15.2 percent, respectively, indicates a strong need for quality affordable housing. This is further magnified given that 20.7 percent of families have incomes below the poverty level, and the median housing value is \$85,270. Thus, government-guaranteed home loan programs with more flexible underwriting criteria may be needed. Second, small business loans may be needed, as there are a significant percentage of businesses with GARs of \$1.0 million or less (80.8 percent) and a large number of businesses with 9 or fewer employees at 87.1 percent.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from November 30, 2015, to the current evaluation dated September 16, 2021. Examiners used the Small Bank CRA Examination Procedures to evaluate GDWs' CRA performance. These procedures include the lending test as described in the Appendices. The bank's assessment area was reviewed using full-scope procedures.

Activities Reviewed

A review of the institution's Call Report, dated June 30, 2021, as shown in the loan portfolio table on page 2, reflected the following: Home mortgage loans (i.e., 1-4 family residential) represented the largest loan category at 37.8 percent of total loans. Business loans (i.e., loans secured by non-

farm, non-residential properties and commercial and industrial) represented the second largest loan category at 35.5 percent of total loans. Farm loans (i.e., secured by farmland and agricultural) at 5.3 percent were not reviewed due to the low volume of such originations compared to the other two aforementioned categories.

For this evaluation, loan distribution analyses were conducted on the bank's 2020 small business and home mortgage loans, which is representative of the bank's activity and focus since the previous evaluation. Equal weight was given to both loan products in the overall Lending Test conclusion, as they both constituted a majority of loans originations during the evaluation period.

The universe of small business loans originated by the bank from January 1, 2020, through December 31, 2020, totaled 170 for \$13.1 million. Of those loans, the bank originated 89 PPP loans totaling approximately \$7.3 million. A random sample of 65 loans totaling \$4.3 million was used to evaluate the bank's performance. Of those loans, the bank originated 16 PPP loans totaling approximately \$844 inside the assessment area. The analysis of small business borrower profile include the PPP loans originated inside the bank's assessment area and are presented in the *Borrower Profile* distribution table. D&B data for 2020 was used for comparison purposes.

GDW is not subject to the Home Mortgage Disclosure Act. Therefore, the bank is not required to collect and report certain data concerning applications for home mortgage loans. During 2020, bank records reflect GDW originated a universe of 78 home mortgage loans totaling \$8.8 million. A random sample of 41 loans totaling \$5.0 million was used to evaluate the bank's performance. The percentage of owner-occupied housing units by geography and the percentage of families by income level (2015 ACS data) were used for comparison purposes.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

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

Loan-to-Deposit Ratio

The average net loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial and economic condition, and assessment area's credit needs. The net LTD ratio for the previous 23 quarters averaged 67.2 percent. This ratio is calculated on a net basis, excluding loan loss reserves and unearned income. Since the previous evaluation, the LTD ratio ranged from a low of 55.5 percent on June 30, 2021, to a high of 73.5 percent on December 31, 2018. As of June 30, 2021, the LTD ratio was 55.5 percent. The LTD ratio has fluctuated, with no specific trends.

Examiners use similarly-situated institutions (SSIs) for comparison. An SSI will generally share similar attributes such as size, branch network, product lines, and assessment area(s). Examiners identified one SSI. The average net LTD ratios for this SSI over the same 23 quarters are shown in the following table. As shown, the bank's LTD ratio is in line with the SSI. Refer to the table below for additional details.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2021 (\$000s)	Average Net LTD Ratio (%)
Geo D. Warthen Bank	\$222.0	67.2
Durden Banking Company	\$231.0	72.7
Source: Call Report 6/30/2015 through 6/30/2021		

Assessment Area Concentration

A majority of the loans reviewed originated inside GDW's assessment area. The following table reveals a majority of small business loans at 75.4 percent by number and 83.5 percent by dollar amount originated inside the bank's assessment area. A majority of the home mortgage loans by number (85.4 percent) and dollar amount (86.9 percent) originated inside the assessment area. The bank's performance indicate its willingness to serve the credit needs of the assessment area.

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		
	#	%	#	%		\$	%	\$	%	
Small Business	49	75.4	16	24.6	65	3,602	83.5	712	16.5	4,314
Home Mortgage	35	85.4	6	14.6	41	4,393	86.9	664	13.1	5,057
Source: 2020 Bank Records.										

Geographic Distribution

This criterion focuses on the bank's lending performance in low- and moderate-income census tracts. As previously noted, GDW's assessment area is comprised of all middle- and upper-income census tracts. As a result, a geographic distribution analysis was not performed since the assessment area does not contain any low- or moderate-income geographies.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. This conclusion is based on reasonable penetration of small business loans.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. Lending to businesses with gross annual revenues of \$1 million or comparably below the percentage of those businesses in the assessment area. The following table illustrates the distribution of loans by gross revenue level of businesses.

Borrower Profile Distribution of Small Business Loans					
GAR Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	79.6	31	63.3	1,686	46.8
>1,000,000	4.0	18	36.7	1,916	53.2
Revenue Not Available	16.4	0	0.0	0	0.0
Totals	100.0	49	100.0	3,602	100.0
Source: 2020 D&B Data; 2020 Bank Records. Due to rounding, totals may not equal 100.0 percent.					

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among individuals of different income levels. Although GDW did not originate any home mortgage loans to low- or moderate-income borrowers, several factors may have contributed to the lack of lending to those individuals. For example, families living below the poverty level in the assessment area total 20.7 percent. Families living below the poverty level generally do not qualify for mortgage loan financing. Also, the bank's performance is further mitigated to some extent, as the bank does not originate long-term, fixed rate residential loans. This loan type is typically more suitable for certain borrowers, particularly low-income and moderate-income borrowers. The bank has a referral program with lenders in the secondary market that provides longer-term fixed-rate financing to borrowers. The bank does not make the credit decision or service those loans. The following table illustrates the dispersion of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	24.0	0	0.0	0	0.0
Moderate	15.2	0	0.0	0	0.0
Middle	17.6	3	8.6	267	6.1
Upper	43.2	30	85.7	3,970	90.4
Not Available	0.0	2	5.7	156	3.5
Total	100.0	35	100.0	4,393	100.0
<i>Source: 2015 ACS Data; and 2020 Bank Records. Due to rounding, totals may not equal 100.0 percent.</i>					

Response to Complaints

The bank has not received any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping meet the community credit needs; therefore, this consideration did not affect the rating.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

THE GEO. D. WARTHEN BANK

Community Reinvestment Act Notice

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each calendar quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from the:

FDIC Regional Director
10 Tenth St NE
Suite 800
Atlanta GA 30309

You may send written comments about our performance in helping to meet community credit needs to the FDIC Regional Director and:

Stephanie McAfee, CRA Officer
The Geo. D. Warthen Bank
216 N. Harris St
Sandersville GA 31082

You may also submit comments electronically through the FDIC's website at **www.fdic.gov/regulations/cra**. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of GDW Bankshares, Inc., a bank holding company. You may request from the Community Affairs Officer, Federal Reserve Bank of Atlanta, 1000 Peachtree St NE, Atlanta GA 30309 an announcement of applications covered by the CRA filed by bank holding companies.

2025 FFIEC Census Report - Summary Census Overview Information

State: GEORGIA

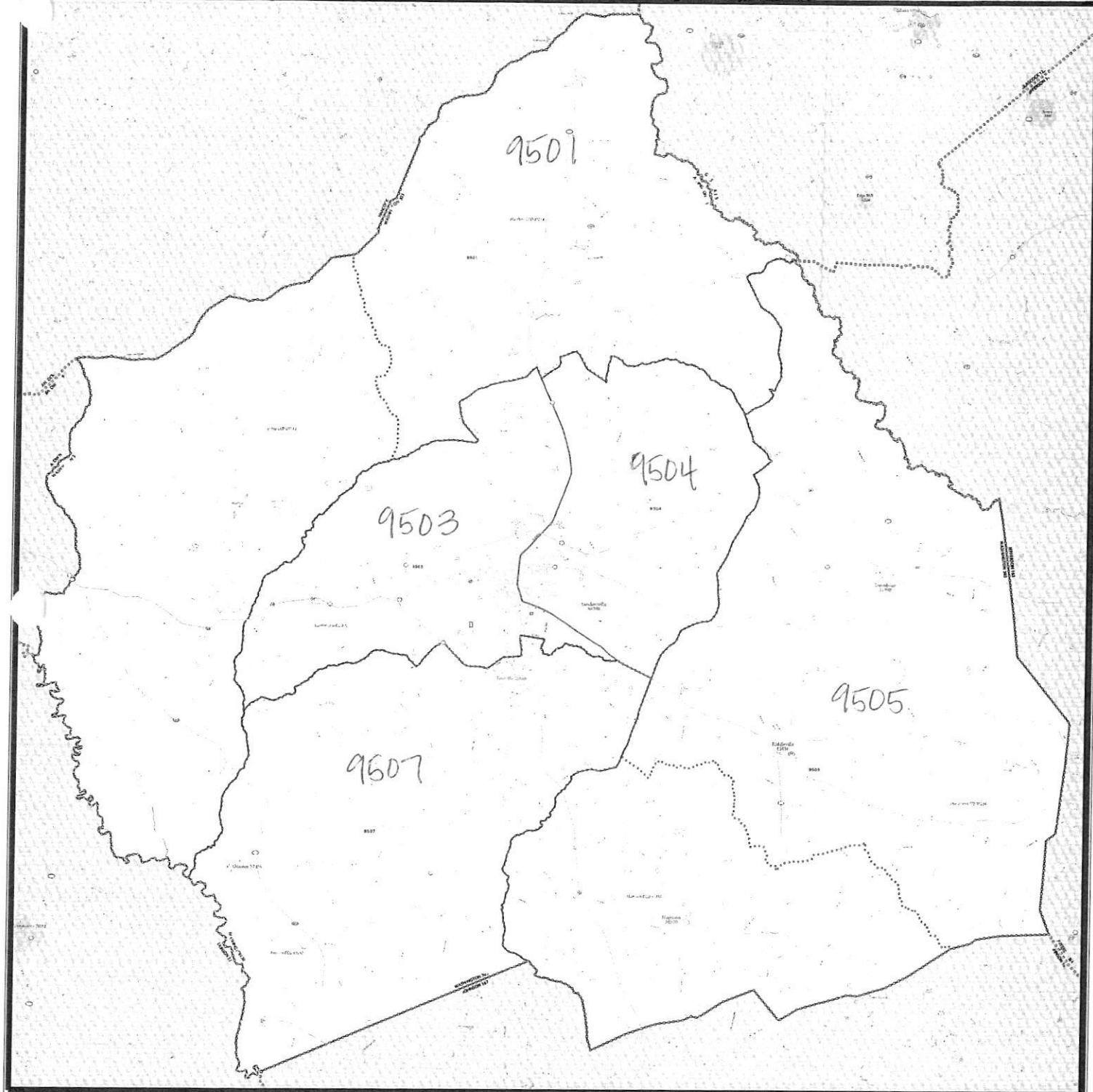
County: 303 - WASHINGTON COUNTY

All Tracts: 5



State Abbr	County Name	Tract code	Tract Income Level	Tract Median Family Income %	Distressed or Underserved Tract	2025 FFIEC Est. MSA/MD/non-MSA/MD Median Family Income	2020 Tract Median Family Income	Tract Population	Minority Population	Tract Minority %	Owner Occupied Units	1- to 4- Family Units
GA	WASHINGTON COUNTY	9501.00	3 - Middle	119.61	Yes	\$76,200	\$66,964	1693	536	31.66	570	923
GA	WASHINGTON COUNTY	9503.00	2 - Moderate	74.40	No	\$76,200	\$41,654	4826	2985	61.85	1166	2070
GA	WASHINGTON COUNTY	9504.00	2 - Moderate	79.32	No	\$76,200	\$44,408	4830	3234	66.96	1313	2300
GA	WASHINGTON COUNTY	9505.00	3 - Middle	88.42	Yes	\$76,200	\$49,500	4901	2457	50.13	1190	1977
GA	WASHINGTON COUNTY	9507.00	2 - Moderate	75.20	No	\$76,200	\$42,101	3738	2364	63.24	908	1830
GA	WASHINGTON COUNTY	9999.99	3 - Middle	84.86	No	\$76,200	\$47,507	19988	11576	57.91	5147	9100

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Washington County, GA

[illegible]

All 17-yr-old females are and were active as of January 1, 2012. The females shown on this map as of 17th January 2012, with all of their collection and treatment records, were those that were captured for collection and/or treatment during the 2011-2012 season. Females and juveniles that collected during the 2010-2011 season are not included in collection or treatment records, or in any of our analyses or results.

[illegible]

sheet 1 of 1 PAREN
 Total Sheets: 1 (Index 0; Parent 1; Insert 0)
 NAME: Washington County (103)
 ENTITY TYPE: County or stat/city eq. equivalent entity
 ST: SC00000000

Location
Contact Information
Hours of Operation

Location: 216 North Harris St.
Sandersville, GA 31082

County: Washington
Census Tract: 9504:00

Contact Information:

Phone Number: 478-552-6901
Fax Number: 478-552-8517
Web Address: www.gdwbank.com

Hours of operation:

Monday: 8:30 A.M. to 5:00 P.M.
Tuesday: 8:30 A.M. to 5:00 P.M.
Wednesday: 8:30 A.M. to 5:00 P.M.
Thursday: 8:30 A.M. to 5:00 P.M.
Friday: 8:30 A.M. to 5:00 P.M.
Saturday: 8:30 A.M. to 12:00 P.M. – Drive Thru Only
Sunday: Closed

ATM's located at: 216 North Harris St. Sandersville, GA and 603 South Harris St.
Sandersville, GA

ATM, Internet & Mobile Banking – 24 hours a day (ATM is Deposit-Taking)

REGULAR SAVINGS

- ☐ Amount required to open account \$100.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$100.00
- ☐ If the minimum daily account balance falls below \$100.00 - there will be a \$5.00 monthly maintenance fee
- ☐ Savings Accounts are restricted to no more than six (6) withdrawals per month. If there are more than six (6) withdrawals per month there is a \$5.00 excessive transaction fee per withdrawal
- ☐ In-person transfers from this account are unlimited

Service charge will be waived for:

- Students
- Churches
- Non-profit/Charitable organizations

LIL' D. SAVINGS CLUB

- ☐ Amount required to open account \$10.00
- ☐ This account is offered to any child age 0-12 (on the child's 13th birthday the account will automatically be converted to a T-CASH Savings)
- ☐ Lil' D. t-shirt given at account opening

T-CASH SAVINGS

- ☐ Amount required to open account \$25.00
- ☐ This account is offered to teens age 13-18
- ☐ Must receive E-Statements
- ☐ Valid email address required
- ☐ Free checks/check reorders
- ☐ T-CASH t-shirt given at account opening

Both T-CASH Checking & Savings account holders are offered bonuses including:

- \$5.00 Shop at Home "birthday" gift certificate—mailed to the customer on his/her birthday
- Quarterly drawing for cool prizes
- At the end of each semester our
- "Straight A" students will receive \$10.00 and all others will receive \$1.00 for every A earned (to be deposited into their T-CASH account)
- T-CASH scholarship offered to the Senior T-CASH account holder

CHARGES THAT MAY BE APPLIED TO ALL ACCOUNTS

- ☐ \$30.00 Stop Payment Fee (checks & drafts)
- ☐ \$30.00 NSF Check Fee/Authorized Overdraft Fee

SAFE DEPOSIT BOXES

Safe deposit boxes are designed to provide a safe place to store valuable, along with the peace of mind that comes from knowing that these items are secure. The GDWB offers a wide variety of safe deposit box sizes that are sure to fit your needs. The rent on safe deposit boxes, which is due annually every January 31, is based on the size of safe deposit box rented. Safe deposit box sizes are:

- | | |
|-----------------------------------|--------------|
| ☐ 2x5x24 | \$15.00/year |
| ☐ 3x5x24 | \$15.00/year |
| ☐ 3x10x24 | \$25.00/year |
| ☐ 5x10x24 | \$35.00/year |
| ☐ 10x10x24 | \$50.00/year |

Although safe deposit boxes are considered a "safe" and "secure" place for personal and important items, there is no 100% guarantee against damage and/or loss. While the companies that manufacture safe deposit boxes and the vaults that house the boxes make them highly "resistant" to fire, flood, heat or other disastrous conditions, the key word is "resistant". The contents of a safe deposit box are **NOT** insured by FDIC.



THE GEO. D. WARTHEN BANK

Checking and Savings Accounts

216 N. Harris St.
P.O. Box 637
Sandersville, Ga. 31082

Phone: 478-552-6901
Toll Free: 1-800-335-1354

www.gdwbank.com

Member FDIC Equal Housing Lender

Checking Account Products

FLAT FEE CHECKING

- ☐ Amount required to open account \$100.00
- ☐ \$7.00 monthly maintenance fee
- ☐ Free first order of checks

PRIME TIME CHECKING

- ☐ This account is offered to customers age 50 or older (one account only)
- ☐ Amount required to open account \$100.00
- ☐ Free checks/check reorders (wallet or duplicate styles only)
- ☐ Services provided with this account:
 - Online Statements (if a monthly, mailed statement is provided, there will be a monthly maintenance fee of \$7.00)
 - Unlimited check writing
 - Waived fee for Stop Payments

T-CASH CHECKING

- ☐ Amount required to open account \$25.00
- ☐ This account is offered to teens age 13-18
- ☐ Must receive E-Statements
- ☐ Valid email address required
- ☐ Free checks/check reorders
- ☐ T-CASH t-shirt given at account opening

Both T-CASH Checking & Savings account holders are offered bonuses including:

- \$5.00 Shop at Home "birthday" gift certificate—mailed to the customer on his/her birthday
- Quarterly drawing for cool prizes
- At the end of each semester our "Straight A" students will receive \$10.00 and all others will receive \$1.00 for every A earned (to be deposited into their T-CASH account)
- T-CASH scholarship offered to the Senior T-CASH account holder

PERSONAL INTEREST CHECKING

- ☐ Amount required to open account \$1,000.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$1,000.00
- ☐ If the minimum daily account balance falls below \$1,000.00 - there will be a \$7.00 monthly maintenance fee
- ☐ Free first order of checks

Now Accounts may only be opened for:

- Individuals
- Sole Proprietorships
- Unincorporated businesses owned by husband and wife
- Governmental entities depositing public funds
- Non-profit/Charitable organizations
- Fiduciary/Trust (if all beneficiaries are eligible)

PERSONAL MONEY MARKET ACCOUNT

- ☐ Amount required to open account \$1,000.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$1,000.00
- ☐ If the minimum daily account balance falls below \$1,000.00 - there will be a \$10.00 monthly maintenance fee
- ☐ Money Market Accounts are restricted to no more than six (6) transfers per statement cycle to a third party. No more than six (6) of these transfers may be made by check. If there are more than six (6) checks/third party transfers paid per statement cycle there is a \$5.00 per check/transfer charge per statement cycle.
- ☐ In-person transfers from this account are unlimited
- ☐ Free first order of checks

REWARD CHECKING

0.25% Interest Rate/0.25% Annual Percentage as of 8/14/2016 *

**Applies to the first \$5,000.00. 0.05% Interest Rate/0.05% Annual Percentage Yield for any balance in excess of \$5,000.00. If all qualification are met. If all account qualifications are not met: A base of 0.05% Interest Rate/0.05% Annual Percentage Yield will be applied to the entire balance.

- ☐ Amount required to open account \$100.00
- ☐ **FREE** from monthly maintenance fees
- ☐ **FREE** unlimited check writing
- ☐ **FREE** first order of checks

**Qualifications:

- You must have at least (12) Debit card transactions post and clear per qualification cycle
- You must have at least (1) ACH Direct Deposit or ACH debit transaction post and clear per qualification cycle
- You must receive E-Statements
- Valid email address required

BUSINESS CHECKING

- ☐ Amount required to open account is \$100.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$1,000.00
- ☐ If the minimum daily account balance falls below \$1,000.00 - there will be a \$5.00 monthly maintenance fee and a .20 per check paid fee (for every check paid during the statement cycle)
- ☐ Unlimited check writing

Monthly maintenance fee will be waived for:

- churches
- Non-profit/Charitable organizations

BUSINESS INTEREST CHECKING

- ☐ Amount required to open account \$1,000.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$1,000.00
- ☐ If the minimum daily account balance falls below \$1,000.00 - there will be a \$7.00 monthly maintenance fee
- ☐ Unlimited check writing

Business Now Accounts may only be opened for:

- Sole Proprietorships
- Unincorporated businesses owned by husband and wife
- Governmental entities depositing public funds
- Non-profit/Charitable organizations

BUSINESS MONEY MARKET ACCOUNT

- ☐ Amount required to open account \$1,000.00
- ☐ No monthly maintenance fee **IF** the daily minimum account balance stays at or above \$1,000.00
- ☐ If the minimum daily account balance falls below \$1,000.00 - there will be a \$10.00 monthly maintenance fee
- ☐ Check writing and debit activity is limited to 6 checks/debits per statement cycle. Each check/debit in excess of 6 will be charged \$5.00 each

Products & Services

In order to fulfill the credit needs of our community, we will make available the following types of loans:

Consumer:

- Automobile Loans
- Motor Home Loans
- Motorcycle Loans
- Boat Loans
- Stock Loans
- Cash Surrender Value Life Insurance Loans
- Loans secured by Savings Accounts and/or Certificate of Deposit Accounts
- Satisfactorily rated Bond Loans
- Unimproved Land Loans
- Unsecured Loans
- Credit Cards

Commercial:

- Loans Secured by Chattel Mortgage on Marketable Equipment
- Loans Secured by Acceptable Accounts Receivable
- Short-Term Working Capital Loans

Residential:

- Permanent Mortgages
- Construction Loans
- Home Equity Loans
- Home Improvement Loans
- Home Repairs
- Mobile Homes
- Residential Loans for 1-4 Dwelling Units
- Residential Loans for 5 Dwelling Units and over

Small Farm Loans:

- Crops
- Equipment
- Livestock

We also provide Internet Banking and Mobile Banking



THE GEO. D. WARTHEN BANK

ESTABLISHED 1871

SANDERSVILLE, GEORGIA

Written Comments from The Public

NO COMMENTS AT THIS TIME