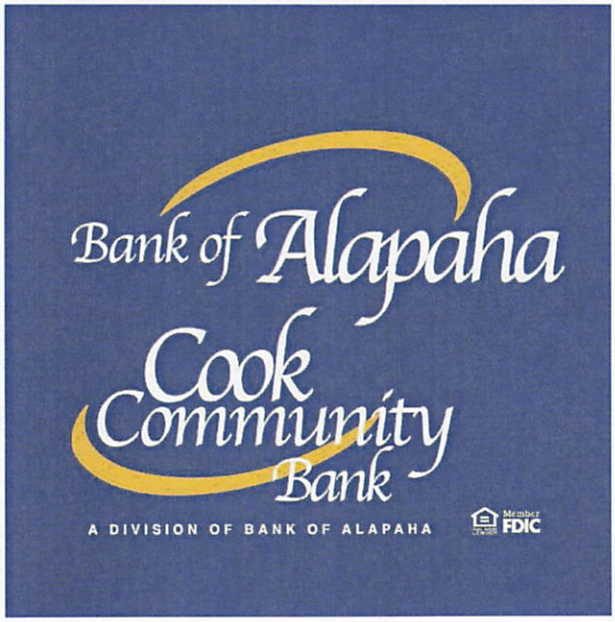


Community Reinvestment Act

CRA Public File

October 1, 2026

Public Comments

No comments have been received over the previous two years, or current year, year-to-date.

Branch & ATM Locations, Hours, and Services

Branch Name	Address	Hours	Census Tract
Alapaha Branch • Drive Up • ATM	245 NE Railroad St. P.O. Box 45 Alapaha, GA 31622	M-TH: 8am - 4pm Fri: 8am - 5pm	9701.00
Enigma Branch • Drive Up • ATM	615 Main St. Enigma, GA 31749	M-TH: 8am - 4pm Fri: 8am - 5pm	9702.00
Nashville Branch • Drive Up • ATM	502 N. Davis St. Nashville, GA 31639	M-TH: 8am - 4pm Fri: 8am - 5pm	9703.00
Adel Branch – Cook Community Bank • Drive Up • ATM	206 E. Fourth St. Adel, GA 31620	M-TH: 8am - 4pm Fri: 8am - 5pm	9603.02

Changes to Branch Locations

There have been no branch closings or openings for the previous two years, or current year, year-to-date. There are plans to open a branch in Ray City late 2026.

Services

Credit Services Offered:
Residential Loans for 1-4 dwelling units
Residential Loans for 5 dwelling units and over
Commercial Loans for income-producing properties
Home Improvement Loans
Small Business Loans
Agri-Business Loans
Community Development Loans
Commercial Loans
Various Consumer Loans for unlimited amounts
Mobile Home Loans
Loans to nonprofit organizations

Traditional Second Mortgage
Participation Loans
Loans for other purposes will be considered
Banking Services:
Checking Accounts
Club Checking Accounts
NOW Accounts
NMIA Accounts
No Service Charge for Senior Citizens Checking Accounts
Drive-In Banking
Night Depository
Safe Deposit Boxes
Savings Accounts
Certificate of Deposits
IRAs
ATM
Automated Phone Service
Internet Banking
Mobile Banking

All services are provided at our Alapaha, Nashville, and Adel branches. The Enigma branch offers limited services.

Fees

ATM Fees at ATMs The Bank will charge for ATM transactions when ATM is used at ATM not owned by Bank of Alapaha. If you use an ATM not owned by the Bank of Alapaha, you will be charged the Owner Transaction fee, and a Bank od Alapaha fee. The Bank of Alapaha does not charge for any POS Transactions	ATM Fees at ATM $3.00
Check Copies	$2/Check
Check Printing	Prices may vary
Deposit Item/ACH Return Fee	$5.00/item
Garnishments/Tax Levies	$20.00

Auto Overdraft Transfer from Account	$2.00/Transfer
Debit Card Replacement	$10.00
Stop Payment	$25.00
ATM Transfer	No Charge
Bank Online Transfers	No Charge
Cashier's Checks	$5.00
Bank Money Orders (non-club account members)	1st Five (per month) are no charge. $5.00 each after 1st Five
Bank Money Orders Reissue (after 90 days)	$5.00
Deposit Bags	No Charge
Deposit Bags Locked	$30.00
Research/Special Handling	$25/hour; $25 minimum
Wire Transfer Fee-Outgoing Domestic Wires	$20.00
Wire Transfer Fee-Incoming Domestic Wires	$15.00
Collection Items-Checks	$30.00
Safe Deposit Boxes	3 x 5 $15/Year 3x10 $25/Year 5 x 10 $40/Year 10 x 10 $70/Year Drilling Box Actual Cost
Alapaha Bill Pay-Consumer	$9.95 per month
Alapaha Bill Pay- Business	$9.95 per month
NSF Fees- Person Checking & Savings Accounts. Maximum per Day is $210.00. The maximum number of Overdraft/Return Items changes per day is 6	$25.00 (items paid or returned) This fee may be imposed for overdrafts created by checks, in-person withdrawals, or other withdrawals by electronic means. **The maximum Overdraft or Return Item fee per day is $210.00 on personal accounts.
NSF Fees- Business Checking & Savings Accounts	$25.00 (items paid or returned) *This fee may be imposed for overdrafts created by checks, in-person withdrawals, or other withdrawals by electronic means. *This fee is also imposed for items that are represented. A fee is charged for each representment.

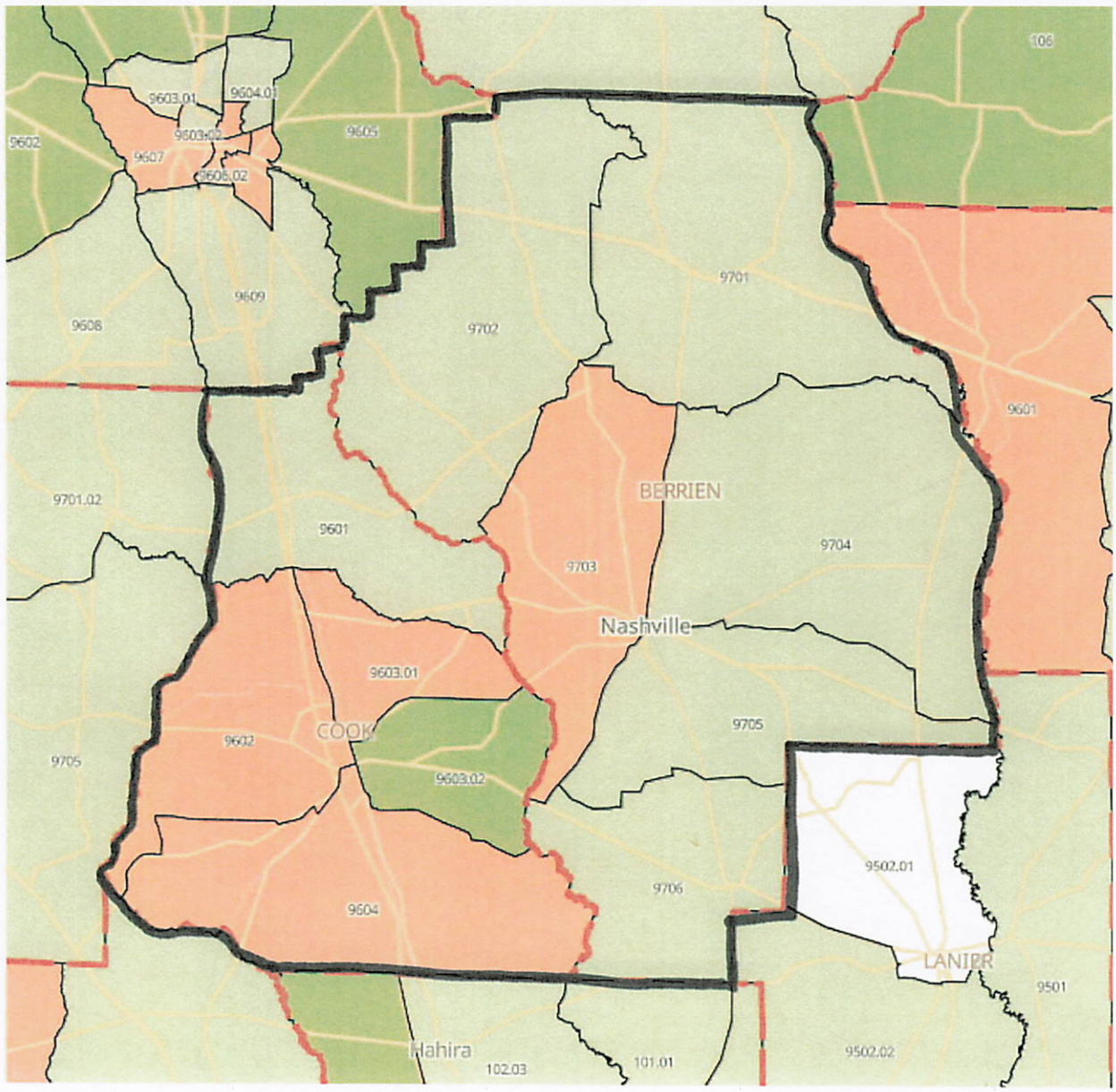
Loan-to-Deposit Ratio

1st Quarter 2026	2nd Quarter 2026	3rd Quarter 2026	4th Quarter 2026
52%	55%	59%	
1st Quarter 2025	**2nd Quarter 2025**	**3rd Quarter 2025**	**4th Quarter 2025**
53%	56%	56%	53%

Home Mortgage Disclosure Act - HMDA

Bank of Alapaha is not presently a HMDA reporter.

Facility-Based Assessment Area Map



State	County	Census Tract	City

GA (13)	Berrien (019)	9701	Alapaha
		9702	Enigma
		9703	Nashville
		9704	Nashville
		9705	Nashville
		9706	Ray City
	Cook (075)	9601	Lenox
		9602	Adel
		9603.01	Sparks
		9603.02	Adel
		9604	Adel

PUBLIC DISCLOSURE

March 9, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Alapaha
Certificate Number: 155

245 NE Railroad Street
Alapaha, Georgia 31622

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.

- Loan-to-Deposit Ratio – The institution's average net 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 home mortgage, small business, and small farm loans reviewed were originated within the assessment area.

- Borrower Profile – The distribution of loans reflects, given the demographics of the assessment areas, reasonable penetration among businesses and farms of different sizes and individuals of different income levels.

- Geographic Distribution of Loans – The geographic distribution of home mortgage, small business, and small farm loans reflects a reasonable dispersion throughout the assessment area.

- Response to Complaints – The bank has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the overall rating.

DESCRIPTION OF INSTITUTION

Bank of Alapaha (BOA) is headquartered in Alapaha, Georgia. BOA is wholly owned by Alapaha Holding Company, a one-bank holding company located in Alapaha, Georgia. BOA does not have any subsidiaries or affiliates, and no merger or acquisition activities have occurred during the evaluation period. BOA received a "Satisfactory" rating at its previous FDIC Performance Evaluation, dated May 18, 2015, based on Small Institution Examination Procedures.

BOA operates four full-service offices in Georgia, including its main office in Alapaha and three branches located in Nashville, Enigma, and Adel, Georgia. The Adel branch operates as Cook Community Bank, a division of Bank of Alapaha. All offices are located in middle-income census tracts. No changes have occurred in the branching network since the previous evaluation.

BOA offers a variety of traditional commercial and consumer banking products and services. The primary business focus is commercial lending, with the secondary emphasis on residential real estate lending. BOA also offers other consumer and agricultural loans. Consumer loans include residential home mortgage loans, construction, home equity loans, mobile home loans, vehicle loans, and other personal loans. Commercial loan products include working lines of credit, letters of credit, term loans, construction loans, and real estate loans. Although not a formal program, BOA also offers small dollar loans in amounts of $2,500 or less. In addition, BOA provides a variety of deposit products and services including checking, savings, money market, and certificates

of deposit accounts. BOA has reasonable lobby hours and maintain automated teller machines at all locations. Alternative banking services include an internet website at www.bankofalapaha.com as well as a 24-hour customer service telephone line. In addition, BOA offers various alternative-banking media, such as online banking, mobile banking, telephone banking, and direct deposit.

As of the December 31, 2020 Reports of Condition and Income (Call Report), BOA reported total assets of $217.9 million, total loans of $111.8 million, and total deposits of $197.3 million. As reflected in the following table, the major loan products include commercial (34.6 percent) and 1-4 family residential loans (30.1 percent), followed by farmland (including agricultural production) loans (21.7 percent).

Loan Portfolio Distribution as of 12/31/2020		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	2,839	2.5
Secured by Farmland	14,831	13.3
Secured by 1-4 Family Residential Properties	33,661	30.1
Secured by Multifamily (5 or more) Residential Properties	476	0.4
Secured by Nonfarm Nonresidential Properties	1,513	1.4
Total Real Estate Loans	**53,320**	**47.7**
Commercial and Industrial Loans	37,087	33.2
Agricultural Production and Other Loans to Farmers	9,364	8.4
Consumer Loans	12,038	10.7
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	**111,809**	**100.0**
Source: 12/31/2020 Call Report		

The bank provides for the credit needs of its communities 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 would affect the bank's ability to meet the AA's credit needs, several economic and demographic indicators, such as the high poverty level, could affect the bank's lending opportunities. In addition, BOA competes with national financial institutions and a variety of local banks, credit unions, and other various non-bank financial entities.

DESCRIPTION OF ASSESSMENT AREA

BOA has defined its AA in accordance with the technical requirements of the CRA regulation. The AA consists of whole census tracts, does not arbitrarily exclude low- or moderate-income census tracts, and includes the census tracts where the bank's offices are located and the majority of its loans are originated. BOA has delineated all of Berrien and Cook Counties as its AA, which are located in the non-metropolitan statistical area portion of the State of Georgia. The AA is comprised of ten census tracts throughout Berrien (six census tracts) and Cook (four census tracts) Counties, including two moderate-income (20 percent) and eight middle-income (80 percent)

census tracts. There are no low-income census tract designations in the assessment area. All eight middle-income CTs are designated as distressed due to high poverty levels.

The bank's AA has not changed since the previous evaluation; however, the income classification of some census tracts has changed. At the previous CRA evaluation, this assessment area consisted of four moderate-, five middle-, and one upper-income census tracts. Since then, the income classification levels of various census tracts nationwide have been revised based on 2015 American Community Survey (ACS) data. As a result, one of the moderate-income census tract was reclassified as middle-income and one middle-income census tract was reclassified as moderate-income within Berrien County. Further, two moderate-income census tracts were reclassified as middle-income and one upper-income census tract was reclassified as a middle-income tract within Cook County.

Economic and Demographic Data

According to Dun & Bradstreet (D&B) data, there are 2,184 businesses and 216 farms operating in the AA. Of the total businesses, 86.4 percent reported gross annual revenues (GAR) of $1 million or less. Of the total farms, 96.3 percent reported GAR of $1 million or less. In addition, of the 2,400 businesses and farms operating in the AA, 62.0 percent reported having four or fewer employees and 91.0 percent reported operating from a single location. The following table provides select demographic information of the AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	10	0.0	20.0	80.0	0.0	0.0
Population by Geography	36,052	0.0	18.8	81.2	0.0	0.0
Housing Units by Geography	15,897	0.0	20.3	79.7	0.0	0.0
Owner-Occupied Units by Geography	9,264	0.0	17.8	82.2	0.0	0.0
Occupied Rental Units by Geography	3,851	0.0	22.7	77.3	0.0	0.0
Vacant Units by Geography	2,782	0.0	25.1	74.9	0.0	0.0
Businesses by Geography	2,184	0.0	20.6	79.4	0.0	0.0
Farms by Geography	216	0.0	13.9	86.1	0.0	0.0
Family Distribution by Income Level	9,400	27.1	16.5	17.8	38.7	0.0
Household Distribution by Income Level	13,115	27.6	16.6	15.5	40.4	0.0
Median Family Income Non-MSAs - GA		$45,886	Median Housing Value			$88,366
			Median Gross Rent			$614
			Families Below Poverty Level			21.1%

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.

From the 2010 census data to the 2015 ACS data, the AA's population decreased from 36,498 to 36,052, representing a 1.2 percent decline. Owner-Occupied housing units decreased from 9,916 to 9,264, representing a 6.6 percent decline. Total families declined by 1.1 percent, and the percentage of families below the poverty level increased from 20.0 percent to 21.1 percent. This poverty rate increase could make it difficult for low-income families to qualify for a home loan or support a monthly mortgage payment considering the median housing value is $88,366. The current median housing value is nearly two-times higher than the median family income.

The Federal Financial Institutions Examination Council's (FFIEC) estimated 2019 median family income (MFI) levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table.

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

According to the Standard Industrial Classification System, service industries represent the largest percentage of businesses at 29.3 percent, followed by non-classifiable establishments at 21.6 percent, and retail trade at 12.2 percent. According to the Georgia Department of Labor, the major employers are Atlas Manufacturing, Inc., BASF Corporation, Chaparral Boats, Inc., Berrien Nursing Center, Coyote MFG CO., Sanderson Farm, Inc., Quality Cargo, LLC, J-M Manufacturing Co, Inc., and Walmart.

As noted in the table below, unemployment levels improved for both counties included in the AA since the previous evaluation. During the period, Berrien County remained slightly above the State and National averages, except for year 2020. Cook County's unemployment rates were generally equal to or slightly better than the State or National average.

Unemployment Rates						
Area	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**
	%	**%**	**%**	**%**	**%**	**%**
Berrien	7.2	6.1	5.1	4.2	4.0	5.2
Cook	6.7	5.4	4.5	3.8	3.4	4.6
Georgia	6.1	5.4	4.7	3.9	3.4	6.5
National	5.3	4.9	4.4	3.9	3.7	8.1
Source: Bureau of Labor Statistics; Not Seasonally Adjusted						

Competition

The AA is moderately competitive for financial services. According to June 30, 2020, FDIC Deposit Market Share data, five FDIC-insured financial institutions operated nine offices within the AA. Of these institutions, BOA ranked first with a 46.7 percent deposit market share.

Community Contact

As a part of the evaluation process, it is customary for examiners to contact third parties within an AA to gather information about the credit needs of the AA. This information helps determine whether local financial institutions are responsive to the needs within the AA. It also shows what credit and community development opportunities are available. An existing contact was used for this evaluation. The community contact spoke to the employment losses due to business closures, the poverty in the local area, and the need for affordable housing, financial literacy programs, and low-cost checking accounts.

Credit Needs

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the AA has credit and community development needs for both small businesses and affordable housing. Small business loans, particularly those for working capital, are in high demand. The significant percentage of businesses with GARs of $1 million or less and the large number of businesses with four or fewer employees support this conclusion. In addition, increasing median home values and the identified shortage of affordable housing also support this conclusion.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated May 18, 2015, to the current evaluation date of March 9, 2021. Examiners used the Interagency Small Institution Examination Procedures to evaluate the CRA performance. These procedures include one test: the CRA Small Bank Lending Test. The Appendices detail the performance criteria related to this test. This evaluation does not include any lending activity performed by affiliates, as the bank does not have any affiliates.

Activities Reviewed

For the Lending Test, the CRA requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. BOA's major loan products are home mortgage, small business, and small farm loans. This determination was based on the December 31, 2020 Call Report and the bank's loan trial. BOA is not subject to the Home Mortgage Disclosure Act (HMDA) and CRA regulatory collection and reporting requirements. BOA also does not separately collect HMDA or CRA lending data. Therefore, the review period for this evaluation is January 1, 2020 to December 31, 2020. Bank management confirmed this timeframe was representative of the evaluation period.

For the Lending Test, examiners selected the universe of home mortgage, small business, and small farm loans for the review of *Assessment Area Concentration* and *Geographic Distribution* criteria. However, borrower income and GAR information was not readily available. Therefore, samples of the home mortgage, small business, and small farm loans were selected for the review of the

Borrower Profile criterion. Refer to the following table for additional details regarding the universe and samples selected for each loan category.

Loan Products Reviewed				
Loan Category	Universe		Sample	
	#	$(000s)	#	$(000s)
Home Mortgage	98	11,753	50	5,086
Small Business	330	21,817	59	4,160
Small Farm	137	23,804	50	5,138
Source: Bank Records				

Examiners review the number and dollar volume of a bank's home mortgage, small business, and small farm loans, as applicable. However, emphasis was placed on the number of loans, as the number of loans is a better indicator of the number of individuals, businesses, and farms served. Based on the number of loans originated for each loan product reviewed, home mortgage, small business, and small farm loans received equal weight in the Lending Test conclusions.

Since specific HMDA data was not collected or reported, the 2015 ACS data provided a standard of comparison for the home mortgage loans. Similarly, the 2020 D&B business data provided a standard of comparison for the small business and small farm loans.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, BOA demonstrated satisfactory performance under the Lending Test. BOA's performance, relative to the loan-to-deposit ratio, assessment area concentration, geographic distribution, and borrower profile supports this conclusion.

Loan-to-Deposit Ratio

BOA's average net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and AA's credit needs. BOA's average NLTD ratio, based on Call Report data, was 76.8 percent over the past 23 calendar quarters from June 30, 2015 to December 31, 2020. The ratio fluctuated from a low of 55.8 percent, as of December 31, 2020, to a high of 85.7 percent, as of September 30, 2017.

A bank's average NLTD ratio is usually compared to similarly-situated institutions. These institutions typically operate within the bank's AA and share similar attributes, such as size, product lines, and branching structure. However, there are no similarly-situated institutions within the bank's AA. Therefore, BOA's average NLTD ratio was compared to its peer group, as defined by the Uniform Bank Performance Report. The bank's peer group consists of 547 FDIC-insured commercial banks with assets between $100 million and $300 million with three or more offices. BOA's average NLTD ratio of 76.8 percent reasonably compares to the peer group's average NLTD of 76.4 percent over the same period.

Assessment Area Concentration

BOA originated a majority of home mortgage, small business, and small farm loans by number and dollar volume inside the AA. This performance demonstrates the bank's efforts to provide credit to individuals, businesses, and farms inside the AA. The following table provides further details about the BOA's lending concentration.

Lending Inside and Outside of the Assessment Area										
	Number of Loans					Dollar Amount of Loans $(000s)				
Loan Category	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage	86	87.8	12	12.2	98	10,507	89.4	1,246	10.6	11,753
Small Business	283	85.8	47	14.2	330	17,859	81.9	3,958	18.1	21,817
Small Farm	99	72.3	38	27.7	137	16,118	67.7	7,686	32.3	23,804
Source: Home Mortgage, Small Business, and Small Farm Evaluation Period: 1/1/2020 - 12/31/2020 Bank Data.										

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the AA. Examiners focused on the distribution of the number of loans and comparisons to available demographic data. There are no low-income census tracts and only two moderate-income census tracts with the AA. Lending within the moderate-income census tracts received favorable consideration. Only loans originated within the AA were included for analysis purposes.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. BOA's level of lending within the moderate-income census tracts reasonably compares to the demographic data. The following table provides details of the 2020 home mortgage geographic distribution.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	$(000s)	%
Moderate	17.8	13	15.1	1,793	17.1
Middle	82.2	73	84.9	8,714	82.9
Total	**100.0**	**86**	**100.0**	**10,507**	**100.0**
Source: 2015 ACS Census, 1/1/2020 - 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0%.					

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. BOA's small business lending in the moderate-income census tracts is in line with demographic data. The following table provides details of the 2020 small business geographic distribution.

Geographic Distribution of Small Business Loans					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Moderate	20.6	59	20.8	4,147	23.2
Middle	79.4	224	79.2	13,712	76.8
Total	**100.0**	**283**	**100.0**	**17,859**	**100.0**
Source: 2015 ACS Data, 1/1/2020 – 12/31/2020 Bank Records. Due to rounding, totals may not equal 100.0%.					

Small Farm Loans

BOA's geographic distribution of the small farm loans reflects a more than reasonable dispersion within the AA. BOA's small farm lending performance in the moderate-income census tracts exceeds the demographic data. The following table provides details of the 2020 small farm geographic distribution.

Geographic Distribution of Small Farm Loans					
Tract Income Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
Moderate	13.9	23	23.2	5,250	32.6
Middle	86.1	76	76.8	10,868	67.4
Total	**100.0**	**99**	**100.0**	**16,118**	**100.0**
Source: 2015 ACS Data, 1/1/2020 – 12/31/2020 Bank Data. Due to rounding, totals may not equal 100.0%.					

Borrower Profile

Overall, the borrower distribution reflects, given the demographics of the AA, a reasonable penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes. Only loans originated inside the AA are included in this analysis.

Home Mortgage Loans

Based on demographic data, BOA's home mortgage lending to borrowers of different income levels reflects reasonable performance. The bank's level of lending to low-income borrowers was significantly lower than the percentage of low-income families in the assessment area. However, it is noted that 21.1 percent of assessment area families have incomes below the poverty level. These families may have difficulty qualifying for conventional home mortgage loans, particularly in light of the high median home value. For moderate-income borrowers, the bank's lending was below demographics, but is generally reasonable.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	**% of Families**	**#**	**%**	**$(000s)**	**%**
Low	27.1	4	8.0	217	4.3
Moderate	16.5	6	12.0	438	8.6
Middle	17.8	10	20.0	654	12.9
Upper	38.7	30	60.0	3,777	74.2
Total	**100.0**	**50**	**100.0**	**5,086**	**100.0**
Source: 2015 ACS Data, Bank Records. Due to rounding, totals may not equal 100.0%.					

Small Business Loans

BOA's level of lending to businesses of different sizes, particularly small businesses, is reasonable. As shown in the following table, the bank's performance slightly exceeds the percent of businesses operating with GARs of $1.0 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Annual Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	86.4	52	88.1	2,966	71.3
>1,000,000	3.5	7	11.9	1,194	28.7
Revenue Not Available	10.1	0	0.0	0	0.0
Total	**100.0**	**59**	**100.0**	**4,160**	**100.0**
Source: 2015 ACS Data, Bank Records. Due to rounding, totals may not equal 100.0%.					

Small Farm Loans

BOA's level of lending to farms of different sizes, particularly small farms, is excellent. As shown in the following table, the bank's performance slightly exceeds the percentage of farms with GARs of $1.0 million or less.

Distribution of Small Farm Loans by Gross Annual Revenue Category					
Gross Annual Revenue Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	96.3	49	98.0	5,078	98.8
>1,000,000	1.4	1	2.0	60	1.2
Revenue Not Available	2.3	0	0.0	0	0.0
Total	**100.0**	**50**	**100.0**	**5,138**	**100.0**
Source: 2015 ACS Data, Bank Records. Due to rounding, totals may not equal 100.0%.					

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Community Reinvestment Act Notice

Under the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evalutes 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.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at Bank of Alapaha located in Georgia, located at 245 NE Railroad St, Alapaha, Georgia.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, Division of Supervision and Consumer Protection (DSC), FDIC 10 Tenth Street, N.E., Suite 800, Atlanta, Georgia 30309. (address). You may send written comments about our performance in helping to meet community credit needs to Jessica Martinez, CRA Officer, Bank of Alapaha 245 NE Railroad Street, Alapaha. GA 31622 and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site 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 Alapaha Holding Company, a bank holding company. You may request from the Vice President, Federal Reserve Bank of Atlanta, 1000 Peachtree Street, N.E., Atlanta, Georgia 30309 an announcement of applications covered by the CRA filed by bank holding companies.

Federal Housing Finance Agency
Community Support Statement

FHFA Form 060
OMB Number 2590-0005
Expires 04/30/2026

FHFA Federal Home Loan Bank (FHLBank) Member ID Number: 14550
Name of FHLBank Member Institution: Bank of Alapaha
Mailing Address: N/S Railroad Street
City: Alapaha **State:** GA **Zip Code:** 31622
Submitter Name: Jessica Martinez **Title:** Loan Compliance Officer
Work Email: jmartinez@bankofalapaha.com

The information in the Community Support Statement (CSS) submitted by the member, as reflected in this document, may be updated, or changed upon FHFA's review of the CSS.

Part I. Community Reinvestment Act (CRA) Standard:

Most recent CRA rating: Satisfactory
Year of most recent CRA rating: 2021

Part II. First-time Homebuyer Standard: *All Federal Home Loan Bank members must complete either Section A or B of this part, except that members with "Outstanding" federal CRA ratings need not complete this part. Members should use data or activities for the previous or current calendar year in completing this part.*

A. Complete the following two questions: *If your institution did not make, or did not track, mortgage loans to first-time homebuyers, you must complete Section B of this part.*

1. Number of mortgage loans made to first-time homebuyers	81
2. Dollar amount of mortgage loans made to first-time homebuyers	$7,745,403

B. Check as many as applicable:

1. Offer in-house first-time homebuyer program (e.g., underwriting, marketing plans, outreach programs)	No
2. Other in-house lending products that serve first-time homebuyers or low- and moderate-income homebuyers	No
3. Offer flexible underwriting standards for first-time homebuyers	No
4. Participate in nationwide first-time homebuyer programs (e.g., Fannie Mae, Freddie Mac)	No
5. Participate in federal government programs that serve first-time homebuyers (e.g., FHA, VA, USDA RD)	No
6. Participate in state or local government programs targeted to first-time homebuyers (e.g., mortgage revenue bond financing)	No
7. Provide financial support or technical assistance to community organizations that assist first-time homebuyers	No
8. Participate in loan consortia that make loans to first-time homebuyers	No
9. Participate in or support special counseling or homeownership education targeted to first-time homebuyers	No
10. Hold investments or make loans that support first-time homebuyer programs	No
11. Hold mortgage-backed securities that may include a pool of loans to low- and moderate-income homebuyers	No
12. Use affiliated lenders, credit union service organizations, or other correspondent, brokerage or referral arrangements with specific unaffiliated lenders, that provide mortgage loans to first-time or low- and moderate-income homebuyers	No
13. Participate in the Affordable Housing Program or other targeted community investment/development programs offered by the Federal Home Loan Bank	No
14. Other (attach description of other activities supporting first-time homebuyers; see instructions for Part II)	No
15. None of the above (attach explanation of any mitigating factors; see instructions for Part II)	Yes

If you checked Question 14 or 15, please explain below. If your explanation will exceed 300 characters, please upload a file containing your explanation and supporting documents:

Currently and throughout this reporting period, we do not participate in any of the above programs.

Supporting documents:

Part III. Certification:

By submitting this Community Support Statement, I certify that I am a senior official of the above institution, that I am authorized to provide this information to FHFA, and that the information in this Statement and any attachments is accurate to the best of my knowledge.

Paperwork Reduction Act Statement: Notwithstanding any other provision of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number.