



11660 Alpharetta Hwy.,  
Suite 225  
Roswell, GA 30076  
Phone: 770-410-4950  
Fax: 770-410-4961

July 29, 2022

Associate Deputy Comptroller, CRA and  
Fair Lending Compliance Management Supervision  
Office of the Comptroller of the Currency  
400 7th Street, SW  
Washington, DC 20219  
Attn: CRA Strategic Plan

Re: 2023-2026 CRA Strategic Plan-First Century Bank, NA

Dear Associate Deputy Comptroller,

First Century Bank continues to believe that the bank's best option for maintaining satisfactory CRA performance is to be evaluated through the CRA Strategic Plan. Please find attached for your review the revised Community Reinvestment Act 2023-2026 Strategic Plan for First Century Bank.

Please feel free to contact me should you have any questions regarding the enclosed plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'William Blanton', written in a cursive style.

William Blanton  
Chairman of the Board and CEO

Attachment

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# **First Century Bank**

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

## **Table of Contents**

- A. About Us**
- B. Historical CRA Performance**
- C. First Century Bank's Strategic Plan**
- D. First Century Bank's Assessment Area**
- E. CRA Strategic Plan Performance Goals for 2023 through 2026**
- F. Public Participation in Development of the Plan**
- G. Notice Regarding Public Inspection of the Plan**
- H. Election of Alternative Performance Evaluations**
- I. Appendix A – Comparison of 2010 and 2022 Loan Balances**
- J. Appendix B – Copy of Public Notice**

**A. About Us**

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

**a. Branch Location**

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

**b. About First Century Bank**

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

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

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

**c. CRA Mission**

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

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

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



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

d. Products/Services

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

Pre-Paid Cards

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

Electronic Banking Products/Services

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

Deposit Products

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

Loan Products

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

e. Competition

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

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

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

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

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

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

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

**B. Historical CRA Performance**

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

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

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

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

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

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

**2017**

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

**2018**

None

**2019**

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

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

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

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

**2021 (Jackson County Assessment Area)**

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

**2021 (Beaufort County Assessment Area)**

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

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

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

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

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

None

For Grants and Donations the Bank had:

**2017**

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

**2018**

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

**2019**

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

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

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

**2021 (Jackson County Assessment Area)**

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

**2021 (Beaufort County Assessment Area)**

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

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

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

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

None

For Service Hours for the Bank had:

**2017**

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

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

**2019**

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

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

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

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

**2021 (Jackson County Assessment Area)**

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

**2021 (Beaufort County Assessment Area)**

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

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

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

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

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

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

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

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

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

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



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

a. Goals

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

b. Effective Date and Term

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

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

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

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

### **Information on Jackson County**

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

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

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

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

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

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

Source: FFIEC Census Reports

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

Source: FFIEC Census Reports



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

Source: FFIEC Census Reports

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

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

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

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

Source: FFIEC Census Reports

### Information on Beaufort County, SC

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

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

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

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

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

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



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



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

Source: FFIEC Census Reports

Tract Code	Tract Income Level	2015 MSA/MD Statewide non-MSA/MD Median Family Income	2021 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2021 Est. Tract Median Family Income	2015 Tract Median Household Income
0001.00	Moderate	\$63,345	\$73,200	26.44	65.73	\$41,642	\$48,114	\$33,818
0002.00	Moderate	\$63,345	\$73,200	31.48	63.05	\$39,943	\$46,153	\$34,222
0003.00	Moderate	\$63,345	\$73,200	11.43	59.4	\$37,633	\$43,481	\$37,243
0004.00	Moderate	\$63,345	\$73,200	0	61.17	\$38,750	\$44,776	\$29,375
0005.01	Moderate	\$63,345	\$73,200	17.15	79.29	\$50,227	\$58,040	\$47,950
0005.02	Middle	\$63,345	\$73,200	18.57	81.15	\$51,406	\$59,402	\$48,125
0005.03	Middle	\$63,345	\$73,200	18.89	98.3	\$62,270	\$71,956	\$57,926
0006.00	Moderate	\$63,345	\$73,200	23.97	73.67	\$46,667	\$53,926	\$37,262
0007.00	Middle	\$63,345	\$73,200	15.27	97.89	\$62,013	\$71,655	\$47,955
0008.00	Moderate	\$63,345	\$73,200	18.82	60.22	\$38,152	\$44,081	\$38,532
0009.01	Upper	\$63,345	\$73,200	7.6	148.46	\$94,046	\$108,673	\$73,167
0009.02	Middle	\$63,345	\$73,200	11.8	101.22	\$64,124	\$74,093	\$57,265
0009.03	Middle	\$63,345	\$73,200	17.87	114.18	\$72,328	\$83,580	\$69,583
0010.00	Moderate	\$63,345	\$73,200	2.83	71.23	\$45,125	\$52,140	\$45,125
0011.01	Middle	\$63,345	\$73,200	9.1	110.64	\$70,088	\$80,988	\$59,538
0011.02	Moderate	\$63,345	\$73,200	24.94	65.54	\$41,522	\$47,975	\$32,210
0012.00	Upper	\$63,345	\$73,200	2.97	156.87	\$99,375	\$114,829	\$80,577
0021.01	Upper	\$63,345	\$73,200	37.23	132.6	\$84,000	\$97,063	\$85,583
0021.02	Middle	\$63,345	\$73,200	8.23	89.55	\$56,731	\$65,551	\$52,368
0021.03	Middle	\$63,345	\$73,200	2.47	114.27	\$72,388	\$83,646	\$70,084
0021.04	Middle	\$63,345	\$73,200	6.33	106.39	\$67,395	\$77,877	\$61,179
0021.05	Middle	\$63,345	\$73,200	6.78	114.35	\$72,436	\$83,704	\$65,395
0021.06	Middle	\$63,345	\$73,200	9.81	104.76	\$66,366	\$76,684	\$66,061
0021.07	Middle	\$63,345	\$73,200	14.64	94.86	\$60,090	\$69,438	\$56,208
0021.08	Middle	\$63,345	\$73,200	13.43	88.04	\$55,772	\$64,445	\$54,853
0022.01	Upper	\$63,345	\$73,200	4.72	155.54	\$98,533	\$113,855	\$79,865
0022.02	Upper	\$63,345	\$73,200	2.54	152.82	\$96,806	\$111,864	\$86,063
0101.00	Upper	\$63,345	\$73,200	5.46	162.9	\$103,194	\$119,243	\$90,224
0102.00	Upper	\$63,345	\$73,200	5.53	174.54	\$110,563	\$127,763	\$81,125
0103.00	Middle	\$63,345	\$73,200	3.98	112.8	\$71,455	\$82,570	\$60,229
0104.00	Upper	\$63,345	\$73,200	5.9	159.73	\$101,181	\$116,922	\$67,872



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

Source: FFIEC Census Reports

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

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

Source: FFIEC Census Reports

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

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

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



0003.00	Moderate	No	59.4	\$73,200	\$43,481	\$37,633	5069	31.45	1594	230	1627
0004.00	Moderate	No	61.17	\$73,200	\$44,776	\$38,750	675	45.48	307	4	96
0005.01	Moderate	No	79.29	\$73,200	\$58,040	\$50,227	6195	54.14	3354	1337	2380
0005.02	Middle	No	81.15	\$73,200	\$59,402	\$51,406	5525	46.84	2588	768	1693
0005.03	Middle	No	98.3	\$73,200	\$71,956	\$62,270	5289	47.42	2508	1265	2045
0006.00	Moderate	No	73.67	\$73,200	\$53,926	\$46,667	2499	30.85	771	449	1129
0007.00	Middle	No	97.89	\$73,200	\$71,655	\$62,013	5746	37.37	2147	1532	2592
0008.00	Moderate	No	60.22	\$73,200	\$44,081	\$38,152	5310	47.72	2534	859	1515
0009.01	Upper	No	148.46	\$73,200	\$108,673	\$94,046	2883	31.95	921	962	1260
0009.02	Middle	No	101.22	\$73,200	\$74,093	\$64,124	8097	19.58	1585	2125	3330
0009.03	Middle	No	114.18	\$73,200	\$83,580	\$72,328	1852	37.85	701	459	738
0010.00	Moderate	No	71.23	\$73,200	\$52,140	\$45,125	4484	36.82	1651	0	250
0011.01	Middle	No	110.64	\$73,200	\$80,988	\$70,088	3614	43.58	1575	1248	2262
0011.02	Moderate	No	65.54	\$73,200	\$47,975	\$41,522	5831	80.11	4671	1568	2678
0012.00	Upper	No	156.87	\$73,200	\$114,829	\$99,375	944	4.24	40	474	1603
0021.01	Upper	No	132.6	\$73,200	\$97,063	\$84,000	599	1.34	8	165	539
0021.02	Middle	No	89.55	\$73,200	\$65,551	\$56,731	1834	24.1	442	571	947
0021.03	Middle	No	114.27	\$73,200	\$83,646	\$72,388	3692	25.95	958	1098	1554
0021.04	Middle	No	106.39	\$73,200	\$77,877	\$67,395	12547	4.42	554	5932	6960
0021.05	Middle	No	114.35	\$73,200	\$83,704	\$72,436	3146	19.33	608	868	1007
0021.06	Middle	No	104.76	\$73,200	\$76,684	\$66,366	9043	33.76	3053	2133	3399
0021.07	Middle	No	94.86	\$73,200	\$69,438	\$60,090	11260	49.28	5549	2033	2671
0021.08	Middle	No	88.04	\$73,200	\$64,445	\$55,772	4863	41.95	2040	934	1585
0022.01	Upper	No	155.54	\$73,200	\$113,855	\$98,533	7602	9.98	759	2580	3390
0022.02	Upper	No	152.82	\$73,200	\$111,864	\$96,806	3346	6.66	223	1192	1801
0101.00	Upper	No	162.9	\$73,200	\$119,243	\$103,194	1742	1.26	22	852	2270
0102.00	Upper	No	174.54	\$73,200	\$127,763	\$110,563	3888	18.52	720	1328	2513
0103.00	Middle	No	112.8	\$73,200	\$82,570	\$71,455	4507	12.23	551	1536	2074

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

Source: FFIEC Census Reports

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

### Qualified Community Investment Goals

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

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

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

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

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

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



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

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

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

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

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

**Lending/Investment Goals**

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

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

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

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

**Jackson County 2023-2026 Goals**

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

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

**Beaufort County 2023-2026 Goals**

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

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

**Grants and Donations Goals**

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



**Jackson County Goals**

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

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

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

**Beaufort County Goals**

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

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

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

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

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

**Service Hours Goals**

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

**Jackson County Goals**

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

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

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

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

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

**Beaufort County Goals**

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

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

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

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

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

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

The Bank solicited comments from the public by posting a notice in the Jackson Herald on June 29, 2022 and The Island Packet on June 24, 2022 and each of the following three weeks in each publication. The notices alerted the public to the creation of the plan and solicited public feedback. See Appendix B for the public notice. No public comments were received during the comment period.

## H. Election of Alternative Performance Evaluations

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

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

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

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



Loans to Individuals - other consumer loans	8,946	26.53%	12.21%	2.29%
Other Loans	845	2.51%	1.15%	0.22%
LESS: Unearned Fees	31	0.09%	0.04%	0.01%
<b>Total Loans</b>	<b>33,714</b>	<b>100.00%</b>		

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

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

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

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

### Part I. Loans and Leases

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

	Dollar Amounts in Thousands		
	RCON	Amount	
1. Loans secured by real estate:			
a. Construction, land development, and other land loans:			
(1) 1-4 family residential construction loans.....	F158	3,046	1.a.1.
(2) Other construction loans and all land development and other land loans.....	F159	7,038	1.a.2.
b. Secured by farmland (including farm residential and other improvements).....	1420	0	1.b.
c. Secured by 1-4 family residential properties:			
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	1797	332	1.c.1.
(2) Closed-end loans secured by 1-4 family residential properties:			
(a) Secured by first liens.....	5367	3,842	1.c.2.a.
(b) Secured by junior liens.....	5368	0	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....	1460	0	1.d.
e. Secured by nonfarm nonresidential properties:			
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	F160	0	1.e.1.
(2) Loans secured by other nonfarm nonresidential properties.....	F161	2,457	1.e.2.
2. Loans to depository institutions and acceptances of other banks.....	L288	0	2.
3. Loans to finance agricultural production and other loans to farmers.....	1590	0	3.
4. Commercial and industrial loans.....	1766	7,151	4.
5. Not applicable			
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):			
a. Credit Cards.....	B538	0	6.a.
b. Other revolving credit plans.....	B539	88	6.b.
c. Automobile loans.....	K137	2	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans and all student loans).....	K207	8,944	6.d.
7. Not applicable			
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.....	2107	0	8.
9. Loans to nondepository financial institutions and other loans:			
a. Loans to nondepository financial institutions.....	J454	0	9.a.
b. Other loans.....	J464	845	9.b.
10. Lease financing receivables (net of unearned income).....	2165	0	10.
11. LESS: Any unearned income on loans reflected in items 1-9 above.....	2123	31	11.
12. Total loans and leases held for investment and held for sale (sum of items 1 through 10 minus item 11) (must equal Schedule RC, sum of items 4.a and 4.b).....	2122	33,714	12.

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

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

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:  
 (1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date. (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender. (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

Dollar amounts in thousands

1. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2), and all or substantially all of the dollar volume of your bank's "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4, have original amounts of \$100,000 or less (If your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.")	RCON6999	NR	1.
<i>If YES, complete items 2 a and 2 b below, skip items 3 and 4, and go to item 5. If NO and your bank has loans outstanding in either loan category, skip items 2 a and 2 b, complete items 3 and 4 below, and go to item 5. If NO and your bank has no loans outstanding in both loan categories, skip items 2 through 4, and go to item 5.</i>			2.
2. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:			
a. "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (Note: Sum of items 1.e.(1) and 1.e.(2) divided by the number of loans should NOT exceed \$100,000.)	RCON5562	NR	2 a.
b. "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (Note: Item 4 divided by the number of loans should NOT exceed \$100,000.) <sup>1</sup>	RCON5563	NR	2 b.

Dollar amounts in thousands

	(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (sum of items 3.a through 3.c must be less than or equal to Schedule RC-C, Part I, sum of items 1.e.(1) and 1.e.(2)):					3.
a. With original amounts of \$100,000 or less	RCON5564	NR	RCON5565	NR	3 a.
b. With original amounts of more than \$100,000 through \$250,000	RCON5566	NR	RCON5567	NR	3 b.
c. With original amounts of more than \$250,000 through \$1,000,000	RCON5568	NR	RCON5569	NR	3 c.
4. Number and amount currently outstanding of "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (sum of items 4.a through 4.c must be less than or equal to Schedule RC-C, Part I, item 4):					4.
a. With original amounts of \$100,000 or less	RCON5570	NR	RCON5571	NR	4 a.
b. With original amounts of more than \$100,000 through \$250,000	RCON5572	NR	RCON5573	NR	4 b.
c. With original amounts of more than \$250,000 through \$1,000,000	RCON5574	NR	RCON5575	NR	4 c.

Dollar amounts in thousands

5. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b, and all or substantially all of the dollar volume of your bank's "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3, have original amounts of \$100,000 or less (If your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.")	RCON6860	NR	5.
<i>If YES, complete items 6.a and 6.b below, and do not complete items 7 and 8. If NO and your bank has loans outstanding in either loan category, skip items 6.a and 6.b and complete items 7 and 8 below. If NO and your bank has no loans outstanding in both loan categories, do not complete items 6 through 8.</i>			6.
6. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:			
a. "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (Note: Item 1.b, divided by the number of loans should NOT exceed \$100,000.)	RCON5576	NR	6 a.
b. "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (Note: Item 3 divided by the number of loans should NOT exceed \$100,000.)	RCON5577	NR	6 b.



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

**J. Appendix B – Copy of Public Notice**

**CRA Strategic Plan Public Notice**

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

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

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