



PUBLIC DISCLOSURE

August 15, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Affinity Bank, National Association
Charter Number 25307

3175 Highway 278
Covington, GA 30014

Office of the Comptroller of the Currency

Three Ravinia Drive
Suite 400
Atlanta, GA 30346 Address

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory

The major factors that support this rating include:

- Affinity Bank's average loan-to-deposit ration reflects a more than reasonable level of lending.
- The bank exhibits a satisfactory distribution of loans in moderate-income geographies.
- The bank exhibits a reasonable distribution of lending to borrowers of different incomes and businesses of different sizes.
- The bank demonstrated adequate responsiveness to the community development (CD) lending and investment needs within its assessment area.

Loan-to-Deposit Ratio

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

Affinity Bank's quarterly LTD ratio averaged 95.0 percent over the 13 quarters since the prior evaluation. The bank's LTD ratio ranged from an average quarterly high of 103.7 percent on March 31, 2020, to an average quarterly low of 85.8 percent on March 31, 2023. Although several competing financial institutions in the AA are equal in asset size, none are considered similarly situated in terms of loan portfolio composition and business strategy. The bank's primary loan products are small business loan originations specifically targeted to the dental industry and loan originations through the bank's indirect auto loan division. Based on the second quarter 2023 Uniform Bank Performance Report, AB's LTD ratio compares favorably with peer group averages. The peer group consisted of 174 banks with total assets between \$300 million and \$1 billion. The bank's LTD ratio of 88.5 percent was above the peer group average of 85.6 percent.

Lending in Assessment Area

A majority of the bank's loans are outside its AA. The bank originated 55.0 percent of its total loans outside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|--|-----------------|------|---------|------|------------|---------------------------|------|-----------|------|-------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$ | | | | Total \$ |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Small Business | 27 | 67.5 | 13 | 32.5 | 40 | 7,442,924 | 70.6 | 3,103,356 | 29.4 | 10,546,280 |
| Consumer | 9 | 22.5 | 31 | 77.5 | 40 | 119,411 | 12.5 | 832,817 | 87.5 | 952,228 |
| Total | 36 | 45.0 | 44 | 55.0 | 80 | 7,562,335 | 65.8 | 3,936,173 | 34.2 | 11,498,508 |

Source: 01/01/2021 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%.

The consumer loan volume above reflects the bank's dealer finance activity. AB operates a robust indirect auto loan department which originates loans from a variety of dealerships throughout Georgia, Florida, Alabama, North Carolina, South Carolina, Tennessee, Kentucky, and Virginia.

Description of Institution

Affinity Bank (AB or bank), formally Newton Federal Bank (NFB), is a single state savings association. In June 2020, NFB was approved as a Covered Savings Association (CSA). As a CSA the bank is permitted to act as a national bank except for certain governance activities including incorporation, bylaws, board of directors, shareholders, mutual members, and distribution of dividends. In January 2021, NFB's holding company (HC), Community First Bancshares, a mutual HC converted to a stock HC and Affinity Bancshares completed its stock related offering. Upon consummation, NFB changed its name to Affinity Bank, Affinity Bancshares became the remaining HC and Community First Bancshares ceased to exist.

The bank is a single-state institution, operating two full service branches in Covington, Georgia under the Newton Federal Bank name, one full service branch in Atlanta under the Affinity bank name and one loan production office (LPO) in Alpharetta, Georgia. The bank remains wholly owned by Affinity Bancshares Inc., a one-bank holding company also located in Covington.

AB primarily originates small business loans to the dental industry for equipment and dental office locations. Newton Federal Bank primarily originates mortgage loans, construction, personal loans and automobile loans. Most commercial loans are originated through the LPO. AB originates most automobile loans through the indirect loan division, Affinity Bank Dealer Select (ABDS). All full-service locations offer non-complex deposit products, such as savings, checking, money market, certificates of deposit and individual retirement accounts. The bank accepts deposits nationwide through Fitness Bank, a virtual bank which provides higher interest rates based on customers meeting specific fitness goals.

The bank's one AA comprises Newton, Cobb, Dekalb, Fulton, and Rockdale Counties, which are part of the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (MSA). The AA complies with the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies. As of December 31, 2022, AB reported total assets of \$792.0 million, net loans of \$636.9 million, and total deposits of \$669.0 million. The loan portfolio included loans secured by real estate of \$387.2 million or 60.8 percent of net loans, commercial loans totaling \$148.0 million or 23.2 percent of net loans, and \$111.0 million in consumer loans or 17.4 percent of net loans. Net loans represented 80.4 percent of total assets. Tier one capital totaled \$87.4 million.

The bank does not have any affiliates. There was no merger, acquisition, expansion activity, or significant changes to the bank's corporate structure since the above-mentioned transactions. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to meet the credit needs of the community. NFB received an overall "Satisfactory" rating at its prior CRA review dated May 18, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of AB using Intermediate Small Bank performance criteria, which includes a lending test and a community development (CD) test. The lending test determines the distribution of the bank's primary loan products among different geographies and borrower characteristics within the AA. The CD test evaluates the bank's responsiveness to CD needs in the AA through qualified lending, investments, and services.

To determine AB's primary lending products, examiners assessed the composition of loan originations during the three-year evaluation period. Small business and consumer loans represented the bank's primary lending products. Small business loan originations represented 24.8 percent by number of originations and 47.3 percent by dollar volume of originations. Consumer loan originations represented 69.4 percent by number of originations and 26.0 percent by dollar volume of originations. Examiners reviewed small business and consumer loans, consistent with the bank's lending focus. Examiners selected a random sample of 80 loan originations, representing 40 for each loan type for each year in the evaluation period. The evaluation period covered January 1, 2020, to December 31, 2021.

Selection of Full-Scope Review

Examiners conducted a full-scope review of the AA. There are no limited-scope areas. Refer to the "Scope" section for details.

Ratings

The bank's overall rating is for the State of Georgia and is based on performance in the AA. Refer to the "Scope" section for details regarding how the state rating was determined for this evaluation.

Discriminatory or Other Illegal Credit Practices Review

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

For years 2020-2021 the demographics comparator is 2015 ACS. For 2022 the demographic comparator is 2020 US Census and aggregate peer data is unavailable.

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

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

State Rating

State of Georgia

CRA rating for the State of Georgia: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The overall distribution of loans is satisfactory.
- The distribution to loans to businesses of different sizes and borrowers of different income is satisfactory.
- Adequate responsiveness to the needs of the communities through CD activities.

Description of Institution's Operations in Georgia

AB operates two full service branches in Covington, Newton County, Georgia under the Newton Federal Bank name, and one full service branch in Atlanta under the Affinity Bank name. The bank is wholly owned by Affinity Bancshares Inc., a one-bank holding company also in Covington.

The bank offers a variety of traditional deposit and loan products, with a primary lending focus of small business loans and indirect auto loans. AB is an approved lender with the US Small Business Administration (SBA). During the COVID-19 pandemic, the bank originated loans through the SBA's Paycheck Protection Program (PPP). In 2020 and 2021, the bank originated 725 PPP loans totaling approximately \$58.0 million which provided financial relief to local businesses. AB offers indirect automobile loans through dealerships located throughout Georgia and seven other southern states. The bank's business plan shows a continued commitment to offer small business and indirect automobile loans.

AB's AA comprises Newton, Cobb, Dekalb, Fulton, and Rockdale counties. These contiguous counties are included in the Atlanta-Sandy Springs-Alpharetta MSA. The MSA encompasses the city of Atlanta and 29 surrounding counties including the AB AA. The MSA is one of the nation's top-performing large metropolitan areas and accounts for more than half of the state's economy. The MSA is recognized as the transportation, distribution, and cultural center of the Southeastern United States. An international airport, three major interstate highways, a metro city bypass, numerous state freeways, and a rapid transit system provides a variety of options to travel within the MSA.

The AB AA contains 762 census tracts (CT) comprising eighty-two low-, one hundred forty-nine moderate-, one hundred seventy-two middle-, and three hundred fifteen upper-income geographies with forty-four CTs "not applicable". According to the 2020 US Census the total population of the AA was 2,803,294. Twenty-one percent of families report low-income and sixteen percent report moderate-income. Nine percent of families live below the poverty level.

The banking environment in the bank's AA is highly competitive and includes a variety of financial institutions including community banks, large banks, and credit unions. In addition to AB, there are sixty other FDIC-insured financial institutions with branches in the AA. Competition is strong from larger financial institutions. As of June 30, 2022, Truist Bank was the leading competitor with \$45.8 million in deposits and 26.2 percent market share. Bank of America ranked second with \$40.6 million in deposits and 23.2 percent market share. AB had total deposits of \$633.0 million and less than 1.0 percent market share.

The following provides demographic data for each county within the bank's AA:

Newton County is east of Atlanta on Interstate 20 in north central Georgia. The Interstate 20 east west corridor provides access to Hartsfield-Jackson International Airport and the port of Savannah within a day's travel. Covington is the county seat and one of five municipalities located entirely within Newton County. Newton County is a popular locale for the motion picture and television show industry. Emory University, Georgia State University and Piedmont Technical College have locations in Newton County. The 2020 U.S. Census Bureau data reflects a population of 112,483. Total housing units were 43,835 with an owner-occupied housing rate of 72.7 percent. The median owner-occupied housing value is \$167,300. The median family income for Newton County is \$64,767, with a poverty level of 12.5 percent. The Georgia Department of Labor data reflects the unemployment rate for Newton County was 3.4 percent as of December 2022. Major employers in Newton County include Covington Moulding Co, FiberVisions, Inc., General Mills Operations, Inc, Lendmark Financial Services, and Newton Health System, Inc.

Cobb County is in the north central portion of the state and northwest of the Atlanta city limit. The county is the third populous county. The county seat is Marietta, and the largest city is Mableton. Cobb County is regarded as one of the best places to live in metro Atlanta with a long history of growing businesses and neighborhoods. The Interstate 285 Perimeter provides easy access to a thriving commercial center as well as recreation and entertainment. The county is home to Truist Park, the Atlanta Braves stadium. The 2020 U.S. Census Bureau data reflects a population of 766,149. Total housing units were 314,317 with an owner-occupied housing rate of 66.2 percent. The median owner-occupied housing value is \$293,800. The median family income for Cobb County is \$86,013, with a poverty level of 9.6 percent. The Georgia Department of Labor data reflects the unemployment rate for Cobb County was 2.6 percent as of December 2022. Major employers in Cobb County include East & Crew Production Services, Fedex Ground Package System, Kennesaw State University, Lockheed Martin Corp. and Piedmont Healthcare, Inc.

Fulton County is the most populous county in Georgia. The county is home to fifteen cities with government centers within the county. Approximately 90 percent of the city of Atlanta is within Fulton County with the remaining 10 percent in DeKalb County. Atlanta is the county seat and the state capital. Almost every major Interstate highway and every major state highway in metro Atlanta passes through Fulton County. A major transit system, the Metropolitan Atlanta Rapid Transit Authority (MARTA), serves most of the county with direct service to Hartsfield-Jackson International Airport. The airport is just outside the Atlanta city limit and is operated by the county as a municipal or general aviation airport servicing business jets and private aircraft. The 2020 U.S. Census Bureau data reflects a population of 1,066,710. Total housing units were 502,807 with an owner-occupied housing rate of 53.1 percent. The median owner-occupied housing value is \$345,100. The median family income for Fulton County is \$77,6363, with a poverty level of 13.7 percent. The Georgia Department of Labor data reflects the unemployment rate for Fulton County was 3.2 percent as of December 2022. Major employers in Fulton County include Amzn Wvcs, LLC, Delta Airlines, Emory Healthcare, Inc, Faubtl, LLC, Georgia Institute of Technology, and Georgia State University.

Dekalb County is primarily a suburban county, the fourth-most populous county in Georgia, and the highest in density of any county in the Atlanta-Sandy Springs-Alpharetta MSA. The county seat is Decatur. Major roadways include Interstate 20 (east/west) and I 85 (north/south). Dekalb County is one of only two counties allowing rapid transit. The east and northeast MARTA rail lines pass through Dekalb county. Georgia's most popular tourist attraction, Stone Mountain, is in Dekalb County. The county is home to several higher education institutions. Agnes Scott College, Emory University and various divisions, Mercer University, Oglethorpe University, GA Perimeter College, Georgia Military College (satellite campus), Georgia Piedmont Technical College, DeVry University, Columbia Theological Seminary, Luther Rice College and Seminary. The 2020 U.S. Census Bureau data reflects a population of 764,382. Total housing units were 330,731 with an owner-occupied housing rate of 56.8 percent. The median owner-occupied housing value is \$255,600. The median family income for Dekalb County is \$69,423, with a poverty level of 14.5 percent. The Georgia Department of Labor data reflects the unemployment rate for Dekalb County was 3.1 percent as of December 2022. Major employers include AT&T Services Inc, Children's Healthcare of Atlanta, Emory Healthcare, Emory University, Georgia Perimeter College, Optum Services, and State Farm Mutual Auto Insurance Company.

Rockdale County is approximately 25 miles from Atlanta. It is the second smallest county in Georgia by area. There are two communities in Rockdale County. Conyers, the county seat, and Lakeview Estates. Major roadways are Interstate 20, US Route 278, and state roads 20 and 138. The Georgia International Horse Park, Black Shoals Lake and Covered Bridge, Lewis Vaughn Botanical Garden, and Monastery of the Holy Spirit are major attractions. The 2020 U.S. Census Bureau data reflects a population of 93,570. Total housing units were 35,913 with an owner-occupied housing rate of 65.5 percent. The median owner-occupied housing value is \$174,600. The median family income for Rockdale County is \$64,230, with a poverty level of 13.6 percent. The Georgia Department of Labor data reflects the unemployment rate for Rockdale County was 3.5 percent as of December 2022. Major employers include Batchelor and Kimball Fabricators, DiversiTech Corporation, Fairway Independent Mortgage Company, Golden State Foods, and Piedmont Rockdale Hospital, Inc.

Affinity Bank AA

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Affinity Bank 2020-21 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 497 | 15.5 | 24.7 | 19.7 | 38.6 | 1.4 |
| Population by Geography | 2,608,913 | 11.0 | 25.7 | 23.1 | 39.6 | 0.6 |
| Housing Units by Geography | 1,113,625 | 12.0 | 25.9 | 22.0 | 39.9 | 0.2 |
| Owner-Occupied Units by Geography | 561,396 | 4.9 | 20.4 | 24.7 | 50.0 | 0.0 |
| Occupied Rental Units by Geography | 418,837 | 18.5 | 31.2 | 19.3 | 30.4 | 0.5 |
| Vacant Units by Geography | 133,392 | 21.2 | 32.4 | 18.7 | 27.4 | 0.3 |
| Businesses by Geography | 567,749 | 7.9 | 22.6 | 21.4 | 47.4 | 0.7 |
| Farms by Geography | 6,941 | 7.2 | 23.0 | 26.0 | 43.6 | 0.2 |
| Family Distribution by Income Level | 593,535 | 23.4 | 15.5 | 16.3 | 44.9 | 0.0 |
| Household Distribution by Income Level | 980,233 | 24.8 | 15.9 | 16.6 | 42.7 | 0.0 |
| Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA | | \$67,322 | Median Housing Value | | | \$212,151 |
| | | | Median Gross Rent | | | \$1,013 |
| | | | Families Below Poverty Level | | | 12.4% |

Source: 2015 ACS and 2021 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.*

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Affinity Bank 2022 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 762 | 10.8 | 19.6 | 22.6 | 41.3 | 5.8 |
| Population by Geography | 2,803,294 | 9.3 | 21.4 | 24.2 | 41.1 | 4.0 |
| Housing Units by Geography | 1,170,258 | 10.0 | 21.0 | 23.7 | 41.1 | 4.3 |
| Owner-Occupied Units by Geography | 618,032 | 4.7 | 16.9 | 25.7 | 50.5 | 2.2 |
| Occupied Rental Units by Geography | 445,513 | 15.7 | 25.9 | 21.6 | 29.9 | 6.8 |
| Vacant Units by Geography | 106,713 | 16.5 | 24.0 | 20.1 | 33.8 | 5.6 |
| Businesses by Geography | 693,235 | 7.2 | 19.0 | 22.4 | 46.8 | 4.7 |
| Farms by Geography | 8,100 | 6.7 | 21.0 | 27.5 | 42.2 | 2.7 |
| Family Distribution by Income Level | 634,632 | 21.8 | 15.5 | 17.5 | 45.1 | 0.0 |
| Household Distribution by Income Level | 1,063,545 | 24.5 | 15.6 | 17.0 | 42.9 | 0.0 |
| Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA | | \$84,791 | Median Housing Value | | | \$286,575 |
| | | | Median Gross Rent | | | \$1,255 |
| | | | Families Below Poverty Level | | | 8.7% |

Source: 2020 U.S. Census and 2022 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.*

Community Contacts

Examiners interviewed representatives from three local non-profit organizations within the bank's AA. The community organizations promote local business and economic development. The representatives noted community needs include more affordable housing, increased financial literacy, and greater small business lending. They identified affordable housing as the greatest concern as some areas are experiencing a limited supply of housing and rental properties.

Scope of Evaluation in Georgia

This analysis reflects a full-scope review of the AB AA. Examiners placed equal weight on the bank's primary loan products: small business and consumer loans. Refer to the table in appendix A: Scope of Examination for additional information on the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the AA during the evaluation period is satisfactory. During 2020-2021, the bank's distribution of small loans to businesses in low-income geographies was below the number of small businesses and the aggregate performance reported by other lenders in these areas. The bank's distribution of small loans to businesses in moderate-income geographies was near-to the number of businesses and the aggregate lender performance in these areas. In 2022, the bank's distribution of small loans to businesses in low-income geographies significantly exceeded the number of small businesses residing in these areas. The percentage of small business loans originated in moderate-income geographies was significantly below the number of businesses in these areas. Aggregate performance from other lenders in the AA was not available.

Consumer Loans

Refer to Table U in appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The geographic distribution of consumer loans in the AA during the evaluation period is satisfactory. During all years, the percentage of consumer loans originated in low-income geographies was below the reported percentage of low-income households in the AA. The percentage of consumer loans originated in moderate-income geographies significantly exceeds the percentage of households residing in moderate-income geographies.

Lending Gap Analysis

Examiners did not identify any unexplained conspicuous lending gaps in the State of Georgia.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

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

The distribution of small loans to businesses is reasonable. During 2020 and 2021, the percentage of bank loans is significantly below the percentage of small businesses in the AA and exceeds the aggregate performance reported by other lenders in the AA. In 2022, the percentage of bank loans is significantly below the percentage of small businesses in the AA. Aggregate performance from other lenders in the AA was not available.

Consumer Loans

Refer to Table V in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to individuals of different income levels is reasonable. During 2020-2021, the percentage of bank loans to low-income individuals was below the percentage of low-income households residing in those areas. The percentage of bank loans to moderate-income individuals significantly exceeds the percentage of moderate-income households. In 2022, the percentage of bank loans to low-income borrowers was near-to the percentage of low-income households. The percentage of bank loans to moderate-income borrowers significantly exceeds the percentage of moderate-income households.

Responses to Complaints

Neither AB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data use to evaluate the bank's level of CD lending.

| Community Development Loans | | | | |
|-----------------------------|-----------|---------------|-----------------|----------------|
| Assessment Area | Total | | | |
| | # | % of Total #* | \$(000's) | % of Total \$* |
| Dekalb | 4 | 21 | \$7,194 | 16 |
| Fulton | 6 | 32 | \$10,893 | 24 |
| Forsyth | 2 | 11 | \$2,611 | 6 |
| Greene | 1 | 5 | \$5,443 | 12 |
| Gwinnett | 2 | 11 | \$5,083 | 11 |
| Essex | 1 | 5 | \$1,890 | 4 |
| Fairfield | 1 | 5 | \$10,000 | 22 |
| Newton | 2 | 11 | \$1,384 | 3 |
| Total | 19 | 100 | \$44,498 | 100 |

Source: Bank Source 2020-2022 Due to rounding, totals may not equal 100.0%. ()*

During this evaluation period, the bank originated seventeen Paycheck Protection Program (PPP) loans exceeding \$1.0 million totaling \$43.1 million. Of the seventeen PPP loans originated, seven or 41 percent were in counties outside of the bank's assessment. These loans were considered in the bank's CD activities due to the nationwide mandate to originate PPP loans and support communities across the country. In addition, AB originated two loans totaling \$1.4 million to construct self-storage facilities in the AA which stabilized the community by creating jobs.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|----------------|-----------|----------------|----------------|-----------|--------------|----------------|---------------|-------------------------|-----------|
| Assessment Area | Prior Period** | | Current Period | | Total | | | | Unfunded Commitments*** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Cobb | 0 | 0 | 1 | \$2 | 1 | 4 | \$2 | 0.2 | 0 | 0 |
| Cobb/Fulton | 0 | 0 | 1 | \$1 | 1 | 4 | \$1 | 0.1 | 0 | 0 |
| Fulton | 0 | 0 | 3 | \$8 | 3 | 12 | \$8 | 0.8 | 0 | 0 |
| Newton | 0 | 0 | 21 | \$1,015 | 21 | 81 | \$1,015 | 99 | 0 | 0 |
| Total* | 0 | 0 | 26 | \$1,026 | 26 | 100 | \$1,026 | 100 | 0 | 0 |

Source: Bank Source 2020-2022 Due to rounding, totals may not equal 100.0%.
 *Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 *** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During this evaluation period, AB made twenty-five qualified donations totaling \$26.4 thousand, which serves low- and moderate-income (LMI) individuals and families. A noteworthy example is \$8 thousand to an organization which helps homeless individuals rebuild their lives through community engagement and education. AB made one qualified investment totaling \$1.0 million to an affordable housing investment bond to construct an age 55 plus residential community with income limitations. The bank reported no prior period investments.

Extent to Which the Bank Provides Community Development Services

AB demonstrated adequate responsiveness to its AA through CD services during this evaluation period. Employees volunteered approximately 260 hours to various organizations in the AA to support LMI individuals. Bank employees provide financial expertise and leadership as directors, officers, and board members of these organizations. AB employees also work with local schools providing financial workshops.

Appendix A: Scope of Examination

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

| | | |
|---|---|--|
| Time Period Reviewed: | January 31, 2020, to December 31, 2022 | |
| Bank Products Reviewed: | Small business and consumer loans. Community development loans, qualified investments, and community development services. | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | NA | NA |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| State of Georgia | | |
| Affinity Bank AA | Full-scope | Newton, Cobb, Dekalb, Fulton, and Rockdale Counties which are part of the Atlanta-Sandy Springs-Alpharetta MSA |

Appendix B: Summary of State Rating

| RATINGS | | Affinity Bank | |
|----------------------|----------------------|----------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | CD Test Rating | Overall Bank/State/Multistate Rating |
| Affinity Bank | Satisfactory | Satisfactory | NA |
| State: | | | |
| Georgia | Satisfactory | Satisfactory | NA |

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| AB AA | 20 | 5,929,269 | 100.0 | 131,672 | 7.9 | 5.0 | 7.2 | 22.6 | 20.0 | 21.9 | 21.4 | 25.0 | 21.5 | 47.4 | 50.0 | 49.0 | 0.7 | 0.0 | 0.5 | |
| Total | 20 | 5,929,269 | 100.0 | 131,672 | 7.9 | 5.0 | 7.2 | 22.6 | 20.0 | 21.9 | 21.4 | 25.0 | 21.5 | 47.4 | 50.0 | 49.0 | 0.7 | 0.0 | 0.5 | |
| Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%. | | | | | | | | | | | | | | | | | | | | |

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2022 | |
|--|---------------------------------|-----------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|-----------|----------------------|--------------|-----------|---------------------|--------------|-----------|-----------------------------|--------------|-----------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| AB AA | 20 | 6,594,775 | 100.0 | NA | 7.2 | 25.0 | NA | 19.0 | 5.0 | NA | 22.4 | 20.0 | NA | 46.8 | 50.0 | NA | 4.7 | 0.0 | NA | |
| Total | 20 | 6,594,775 | 100.0 | NA | 7.2 | 25.0 | NA | 19.0 | 5.0 | NA | 22.4 | 20.0 | NA | 46.8 | 50.0 | NA | 4.7 | 0.0 | NA | |
| Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data not available. Due to rounding, totals may not equal 100.0%. | | | | | | | | | | | | | | | | | | | | |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|---------------------------------|------------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| AB AA | 20 | 5,929,269 | 100.0 | 131,672 | 92.8 | 50.0 | 41.3 | 2.3 | 45.0 | 4.9 | 5.0 | |
| Total | 20 | 5,929,269 | 100.0 | 131,672 | 92.8 | 50.0 | 41.3 | 2.3 | 45.0 | 4.9 | 5.0 | |
| <i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i> | | | | | | | | | | | | |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2022 |
|---|---------------------------------|------------------|--------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|--------------|-------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| AB AA | 20 | 6,594,775 | 100.0 | NA | 93.9 | 40.0 | NA | 1.8 | 60.0 | 4.3 | 0.0 | |
| Total | 20 | 6,594,775 | 100.0 | NA | 93.9 | 40.0 | NA | 1.8 | 60.0 | 4.3 | 0.0 | |
| <i>Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data not available. Due to rounding, totals may not equal 100.0%.</i> | | | | | | | | | | | | |

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|----------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| AB AA | 20 | 310,348 | 100.0 | 10.7 | 5.0 | 25.0 | 40.0 | 22.4 | 30.0 | 41.6 | 25.0 | 0.2 | 0.0 | |
| Total | 20 | 310,348 | 100.0 | 10.7 | 5.0 | 25.0 | 40.0 | 22.4 | 30.0 | 41.6 | 25.0 | 0.2 | 0.0 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2022 | |
|--|----------------------|----------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| AB AA | 20 | 509,150 | 100.0 | 9.3 | 5.0 | 20.7 | 35.0 | 24.0 | 45.0 | 41.9 | 15.0 | 4.1 | 0.0 | |
| Total | 20 | 509,150 | 100.0 | 9.3 | 5.0 | 20.7 | 35.0 | 24.0 | 45.0 | 41.9 | 15.0 | 4.1 | 0.0 | |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%.

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|----------------|---------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| AB AA | 20 | 310,348 | 100.00 | 24.8 | 10.0 | 16.0 | 45.0 | 16.6 | 20.0 | 42.7 | 10.0 | 0.0 | 15.0 | |
| Total | 20 | 310,348 | 100.00 | 24.8 | 10.0 | 16.0 | 45.0 | 16.6 | 20.0 | 42.7 | 10.0 | 0.0 | 15.0 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2022 | |
|--|----------------------|----------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| AB AA | 20 | 509,150 | 100.0 | 24.5 | 20.0 | 15.6 | 30.0 | 17.0 | 15.0 | 42.9 | 30.0 | 0.0 | 5.0 | |
| Total | 20 | 509,150 | 100.0 | 24.5 | 20.0 | 15.6 | 30.0 | 17.0 | 15.0 | 42.9 | 30.0 | 0.0 | 5.0 | |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%.