



CRA PUBLIC FILE

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CRA Public File Section 1:

Written Comments from the Public

No written comments from the public that relate to the bank's performance in helping to meet community credit needs have been received.

CRA Public File Section 2:

FDIC Public Evaluations

The FDIC evaluated The Piedmont Bank's CRA performance on April 19, 2021. A copy of the Public Disclosure is included in this section of the bank's CRA Public File.

PUBLIC DISCLOSURE

April 19, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Piedmont Bank
Certificate Number: 58374

5100 Peachtree Parkway
Peachtree Corners, Georgia 30092

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

10 Tenth Street Northeast, Suite 800
Atlanta, Georgia 30309

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable, given the institution's size, financial condition, and assessment areas' credit needs.
- The majority of loans were originated within the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, poor penetration among businesses of different sizes and individuals of different income levels.
- The bank did not receive any CRA-related complaints since the previous CRA evaluation as of November 13, 2017; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

The bank demonstrated an overall adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the assessment areas.

DESCRIPTION OF INSTITUTION

Background

The Piedmont Bank is headquartered in Peachtree Corners, Georgia (GA) and is owned by Piedmont Bancorp, Inc., also located in Peachtree Corners, GA.

The bank received a Satisfactory rating at its November 13, 2017 FDIC Performance Evaluation, based on Interagency Intermediate Small Institution Examination Procedures.

Operations

The bank operates a main office and eleven full-service branch offices located in nine counties in GA. Since the previous evaluation, the main office address was re-designated from Norcross, GA to Peachtree Corners, GA on January 9, 2020. Also, the bank opened three new branch offices: one in Chamblee, DeKalb County, GA, on December 7, 2017 (formerly a loan production office); one in Cumming, Forsyth County, GA on April 18, 2018 (formerly a loan production office), and one in Blue Ridge, Fannin County, GA on April 30, 2018. Further, the bank purchased Westside Bank, Hiram, GA, on February 5, 2021, acquiring two offices, one in Hiram, Paulding County, GA and one in Mableton, Cobb County, GA. No offices have been closed since the prior evaluation.

Ability and Capacity

Commercial lending represents the bank's primary business focus, which is consistent with the business strategy at the previous evaluation. The bank offers loan products, including commercial secured and unsecured, home mortgage, and consumer secured and unsecured loans. The bank also offers a variety of deposit products, including checking, savings, individual retirement, and certificate of deposit accounts. Additionally, the bank offers alternative banking services, such as telephone banking, internet banking, mobile banking, and automated teller machines (ATMs).

As of December 31, 2020, The Piedmont Bank's Call Report of Condition and Income (Call Report) reflected total assets of \$1.4 billion, total loans of \$1.0 billion, total deposits of \$1.2 billion, and total securities of \$64.1 million. As shown in the below table, commercial loans (loans secured by non-farm, non-residential properties and commercial and industrial loans) represent the largest portion of the loan portfolio at 66.0 percent, followed by construction, land development, and other land loans at 19.1 percent and loans secured by 1-4 family residential properties at 10.5 percent.

Loan Portfolio Distribution as of 12/31/2020		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	193,808	19.1
Secured by Farmland	4,570	0.4
Secured by 1-4 Family Residential Properties	107,273	10.5
Secured by Multifamily (5 or more) Residential Properties	11,884	1.2
Secured by Nonfarm Nonresidential Properties	432,106	42.5
Total Real Estate Loans	749,641	73.7
Commercial and Industrial Loans	238,751	23.5
Agricultural Production and Other Loans to Farmers	1,910	0.2
Consumer Loans	7,231	0.7
Obligations of State and Political Subdivisions in the U.S.	22,071	2.2
Other Loans	995	0.1
Less: Unearned Income	(3,604)	(0.4)
Total Loans	1,016,995	100.0
<i>Source: Call Report</i>		

There are no financial, legal, or other impediments that would limit the bank's ability to meet the credit needs of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The Piedmont Bank delineated three assessment areas located in two metropolitan statistical areas (MSAs) and one non-MSA, all within GA. Bank management delineated the assessment areas based on the location of the bank's offices and the expectation of attracting and retaining a customer base within the areas surrounding the bank's offices.

The below table provides a summary of the assessment areas, including the counties and number of census tracts and bank offices, that were included in the scope of this evaluation. Due to the recent purchase of Westside Bank, the below table excludes Paulding County from the Atlanta-Sandy Springs-Alpharetta, GA MSA (Atlanta MSA) and the two offices acquired in Paulding and Cobb Counties. Since the prior evaluation, the Atlanta MSA was revised to remove Barrow and Walton Counties; reduce the number of census tracts in DeKalb and Fulton Counties; and add Paulding County. The Non-MSA GA assessment area (Non-MSA) was increased to add Fannin County, due to the opening of the Blue Ridge office. The Gainesville, GA MSA assessment area (Gainesville MSA) has not changed. Refer also to individual assessment area discussions for further details.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of Census Tracts	# of Bank Offices
Atlanta-Sandy Springs-Alpharetta, GA MSA (Atlanta MSA)	Cobb, DeKalb (partial), Forsyth, Fulton (partial), and Gwinnett	534	6
Non-MSA GA (Non-MSA)	Fannin, Jackson, and White	21	3
Gainesville, GA MSA (Gainesville MSA)	Hall	36	1
<i>Source: Bank Data</i>			

The Federal Financial Institutions Examination Council (FFIEC) estimates median family income (MFI) figures for the Atlanta MSA, Non-MSA GA, and Gainesville MSA. The 2018, 2019, and 2020 MFI levels were used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income MFI ranges are shown in the below tables.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Atlanta MSA				
2018 (\$74,400)	<\$37,200	\$37,200 to <\$59,520	\$59,520 to <\$89,280	≥\$89,280
2019 (\$79,200)	<\$39,600	\$39,600 to <\$63,360	\$63,360 to <\$95,040	≥\$95,040
2020 (\$82,200)	<\$41,100	\$41,100 to <\$65,760	\$65,760 to <\$98,640	≥\$98,640
<i>Source: FFIEC</i>				
Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Non-MSA				
2018 (\$48,900)	<\$24,450	\$24,450 to <\$39,120	\$39,120 to <\$58,680	≥\$58,680
2019 (\$49,700)	<\$24,850	\$24,850 to <\$39,760	\$39,760 to <\$59,640	≥\$59,640
2020 (\$51,800)	<\$25,900	\$25,900 to <\$41,440	\$41,440 to <\$62,160	≥\$62,160
<i>Source: FFIEC</i>				
Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Gainesville MSA				
2018 (\$64,200)	<\$32,100	\$32,100 to <\$51,360	\$51,360 to <\$77,040	≥\$77,040
2019 (\$66,800)	<\$33,400	\$33,400 to <\$53,440	\$53,440 to <\$80,160	≥\$80,160
2020 (\$75,500)	<\$37,750	\$37,750 to <\$60,400	\$60,400 to <\$90,600	≥\$90,600
<i>Source: FFIEC</i>				

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the prior evaluation dated November 13, 2017, to the current evaluation dated April 19, 2021. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate the bank’s CRA performance. These procedures included the CRA Small Bank Lending Test and the Community Development Test.

Examiners performed full-scope reviews of the Atlanta MSA and Non-MSA assessment areas and a limited-scope review of the Gainesville MSA assessment area. Examiners gave more weight to bank activities in the Atlanta MSA assessment area, due to the number of branches and amount of activity therein. The table below shows lending, deposits, and bank offices in the assessment areas.

Loans, Deposits, and Branches in the Assessment Areas						
Assessment Area	Loans		Deposits		Bank Offices	
	\$(000s)	%	\$(000s)	%	#	%
Atlanta MSA	212,716	73.2	724,122	68.1	6	60.0
Non-MSA	50,228	17.3	312,623	29.4	3	30.0
Gainesville MSA	27,805	9.5	26,184	2.5	1	10.0
Total	290,749	100.0	1,062,929	100.0	10	100.0

Source: Bank Data; FDIC Summary of Deposits (06/30/2020)

Activities Reviewed

The bank’s major product lines are primarily commercial (small business) and home mortgage loans. This conclusion considered the bank’s business strategy and distribution of the loan portfolio. No other loan types, such as small farm or consumer loans, represent a major product line; therefore, they provided no material support for conclusions or ratings and are not presented.

From January 1, 2019, through December 31, 2019, the bank originated 319 small business loans totaling \$100.6 million. The entire universe was evaluated for *Assessment Area Concentration* and *Geographic Distribution performance*. Since borrower income was not readily available, a sample was selected from the 261 small business loans totaling \$84.8 million that were originated within the assessment areas to evaluate *Borrower Profile performance*. The sample included 80 small business loans totaling \$24.9 million. D&B data for 2019 provided a standard of comparison for the small business loans.

From January 1, 2020, through December 31, 2020, the bank originated 1,255 small business loans totaling \$167.3 million. This universe included 367 core small business loans totaling \$98,610,000 and 888 loans originated under the Small Business Administration’s Paycheck Protection Program (PPP) totaling \$68,663,000. The entire universe was evaluated for *Assessment Area Concentration* and *Geographic Distribution performance*. Since borrower income was not readily available on core small business loans and the bank was not required to collect income data for underwriting PPP loans, a sample was selected to evaluate *Borrower Profile performance* and included 79 core small business loans totaling \$24.3 million that were originated within the assessment areas. D&B data for 2020 provided a standard of comparison for the small business loans.

This evaluation considered all home mortgage loans reported on the bank’s 2018, 2019, and 2020 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). During 2018, the bank originated 98 HMDA loans totaling \$31,780,000. During 2019, the bank originated 124 HMDA loans totaling \$45,275,000. During 2020, the bank originated 135 HMDA loans totaling \$43,599,000. Examiners did not identify trends from 2018 to 2020 that would materially affect conclusions. Therefore, only 2019 HMDA loan performance is presented, as it is the most recent calendar year when aggregate HMDA information is also available. However, any observed anomalies are discussed under the *Geographic Distribution* and *Borrower Profile* performance discussions. In addition to aggregate HMDA data, the 2015 American Community Survey (ACS) demographic data (owner-occupied housing units by geography and the distribution of families by income level) provided a standard of comparison for home mortgage loans.

For the Lending Test, small business loans received more weight than home mortgage loans, based on the commercial lending focus and volume of home mortgage loans. Also, the analyses focused on the number of loans originated rather than dollar volume, as loans extended to small businesses and low- and moderate-income borrowers are generally for smaller dollar amounts and a better indicator of the number of businesses and individuals served.

For the Community Development Test, bank management provided information on community development loans, qualified investments, and community development services from November 13, 2017 through March 31, 2021.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Piedmont Bank demonstrated reasonable performance under the Lending Test. The Loan-to-Deposit Ratio, Assessment Area Concentration, and Geographic Distribution primarily support the conclusion.

Loan-to-Deposit Ratio

The bank's net loan-to-deposit (NLTD) ratio is more than reasonable given the institution's size, financial condition, and credit needs of the assessment areas. Examiners calculated the average NLTD ratio of 93.1 percent using the 13 quarter-end ratios since the previous evaluation. The NLTD ratio as of December 31, 2020, was 83.6 percent. Quarterly NLTD ratios have ranged from a high of 97.4 percent as of March 31, 2018, to a low of 83.6 percent as of December 31, 2020.

While The Piedmont Bank has many competitors, none are similarly situated in terms of total assets, markets served, products offered, and office locations. As a result, examiners compared the bank's average NLTD ratio to that of a peer group defined by the Uniform Bank Performance Report (UBPR). The bank's UBPR peer group now includes insured commercial banks having total assets between \$1 billion and \$3 billion. Examiners calculated the UBPR peer group average NLTD ratio at 83.4 percent, which was lower than the bank's average NLTD ratio.

Assessment Area Concentration

The Piedmont Bank originated a majority of its home mortgage and small business loans within the assessment areas. The following table details lending inside and outside of the assessment areas.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans					Dollar Amount of Loans \$(000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2018	73	74.5	25	25.5	98	15,549	48.9	16,231	51.1	31,780
2019	86	69.4	38	30.6	124	26,462	58.4	18,813	41.6	45,275
2020	98	72.6	37	27.4	135	24,647	56.5	18,952	43.5	43,599
Subtotal	257	72.0	100	28.0	357	66,658	55.2	53,996	44.8	120,654
Small Business										
2019	261	81.8	58	18.2	319	84,765	84.3	15,818	15.7	100,583
2020	1,015	80.9	240	19.1	1,255	139,326	83.3	27,948	16.7	167,274
Subtotal	1,276	81.1	298	18.9	1,574	224,091	83.7	43,766	16.3	267,857

Source: HMDA Reported Data and Bank Records.

The below tables detail the small business and home mortgage lending within each assessment area.

Small Business Lending Activity in Assessment Areas				
Assessment Area	#	%	\$(000s)	%
Atlanta MSA	891	69.8	170,861	76.2
Non-MSA	283	22.2	33,953	15.2
Gainesville MSA	102	8.0	19,277	8.6
Total Small Business Loans	1,276	100.0	224,091	100.0

Source: Bank Records

Home Mortgage Lending Activity in Assessment Areas				
Assessment Area	#	%	\$(000s)	%
Atlanta MSA	90	35.0	41,855	62.8
Non-MSA	126	49.0	16,275	24.4
Gainesville MSA	41	16.0	8,528	12.8
Total Mortgage Loans	257	100.0	66,658	100.0

Source: HMDA Reported Data

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Conclusions regarding the bank’s performance are generally consistent throughout the assessment areas. Refer to the *Geographic Distribution* sections of each assessment area for a discussion of the bank’s performance in those areas.

Borrower Profile

The distribution of loans to borrowers reflects, given the demographics of the assessment areas, a poor penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income individuals). Refer to the *Borrower Profile* sections of each assessment area for a discussion of the bank’s performance in those areas.

Response to Complaints

The bank did not receive any CRA-related complaints since the prior evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

The Piedmont Bank’s community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in the institution’s assessment areas.

Community Development Loans

During the evaluation period, The Piedmont Bank originated, renewed, or refinanced 34 community development loans totaling \$51.6 million, compared to 14 loans totaling \$2.6 million at the previous evaluation. The bank’s community development lending activities equaled 5.1 percent of total loans and 3.7 percent of total assets as of December 31, 2020, which exceed the level of activity at the previous evaluation. The bank’s community development loans supported economic development, revitalization or stabilization efforts in low- and moderate-income census tracts, and community development services within its assessment areas. Refer to the analyses provided in the individual assessment area sections of this evaluation for a detailed discussion of individual community development loans. The following tables reflect the bank’s community development lending by activity year and purpose and by assessment area and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017 (partial)	-	-	-	-	1	1,400	-	-	1	1,400
2018	-	-	2	300	2	17,778	-	-	4	18,078
2019	-	-	1	2,100	1	1,000	-	-	2	3,100
2020	-	-	7	2,331	4	6,900	11	14,183	22	23,414
YTD 2021	-	-	-	-	2	1,824	3	3,806	5	5,630
Total	-	-	10	4,731	10	28,902	14	17,989	34	51,622

Source: Bank Records

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Atlanta MSA	-	-	9	4,717	3	15,679	12	17,371	24	37,767
Non-MSA	-	-	1	14	5	10,133	-	-	6	10,147
Gainesville MSA	-	-	-	-	2	3,090	2	618	4	3,708
Total	-	-	10	4,731	10	28,902	14	17,989	34	51,622

Source: Bank Records

Qualified Investments

During the evaluation period, the bank made or maintained two qualified investments totaling \$1,543,000, comprised of two municipal bonds, and made 65 donations totaling \$278,000. As of December 31, 2020, qualified investments totaled 0.1 percent of total assets and 2.8 percent of total securities. This level of activity is slightly less than at the prior evaluation. Refer to the analyses provided in the individual assessment area sections of this evaluation for a detailed discussion of individual qualified investments. The following tables reflect the qualified investments by activity year and purpose and by assessment area and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	-	-	-	-	-	-
2019	-	-	-	-	-	-	-	-	-	-
2020	-	-	1	944	-	-	-	-	1	944
2021 (YTD)	-	-	-	-	-	-	1	599	1	599
Subtotal	-	-	1	944	-	-	1	599	2	1,543
Qualified Grants & Donations	1	1	53	253	11	24	-	-	65	278
Total	1	1	54	1,197	11	24	1	599	67	1,821

Source: Bank Records

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Atlanta MSA	1	1	50	252	10	24	1	599	62	876
Non-MSA	-	-	3	1	1	<1	-	-	4	1
Gainesville MSA	-	-	1	944	-	-	-	-	1	944
Total	1	1	54	1,197	11	24	1	599	67	1,821

Source: Bank Records

Community Development Services

During the evaluation period, bank employees provided 27 instances of financial expertise or technical assistance to various organizations with respect to community services and economic development. The volume of community development services notably increased since the prior evaluation when the bank provided six community development services. In addition to the retail services detailed below, refer to the analyses provided in the individual assessment area sections of this evaluation for a discussion of individual community development services. The below tables reflect community development services by activity year and purpose and by assessment area and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2017	-	1	1	-	2
2018	-	5	4	-	9
2019	-	6	4	-	10
2020	-	3	3	-	6
Total	-	15	12	-	27

Source: Bank Records

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Atlanta MSA	-	12	7	-	19
Non-MSA	-	1	5	-	6
Gainesville MSA	-	2	-	-	2
Total	-	15	12	-	27

Source: Bank Records

Retail Services

The following are examples of retail bank services provided during the evaluation period that benefited low- and moderate-income individuals.

- The bank offers Interest on Lawyers Trust Accounts (IOLTAs). The interest earned by the law firms on the IOLTAs is used to fund pro bono legal services for low- and moderate-income individuals and is administered by the Georgia Bar Foundation.
- The bank offers “Classic Checking”, “Free Checking”, and “E-Checking” accounts with no service fees, no minimum balance requirement, and a \$100 or less minimum opening deposit requirement. These accounts are beneficial to the low- and moderate-income populace within the assessment areas.

- **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners evaluated the bank’s compliance with anti-discrimination laws, including the Fair Housing Act and the Equal Credit Opportunity Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

ATLANTA MSA ASSESSMENT AREA– Full-Scope- Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ATLANTA MSA ASSESSMENT AREA

The Atlanta MSA assessment area consists of Cobb, Forsyth, and Gwinnett Counties in their entirety and portions of DeKalb and Fulton Counties north of Interstate 20. The bank operates six, or 60 percent, of its branch offices in the Atlanta MSA assessment area. The assessment area accounts for 73.2 percent of total loans and 68.1 percent of bank-wide deposits.

Economic and Demographic Data

The below table presents demographic information from the 2015 ACS census and 2020 D&B data.

Demographic Information of the Atlanta MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	534	9.2	21.3	22.5	46.1	0.9
Population by Geography	2,994,295	7.2	20.2	26.0	46.2	0.5
Housing Units by Geography	1,199,560	7.8	20.8	24.6	46.5	0.2
Owner-Occupied Units by Geography	661,770	3.0	14.2	26.1	56.6	0.0
Occupied Rental Units by Geography	420,134	13.6	29.4	23.0	33.5	0.5
Vacant Units by Geography	117,656	14.1	27.4	21.7	36.5	0.3
Businesses by Geography	502,618	4.8	17.7	23.7	53.0	0.7
Farms by Geography	6,973	4.1	17.5	28.2	50.0	0.2
Family Distribution by Income Level	705,823	20.2	14.9	16.4	48.4	0.0
Household Distribution by Income Level	1,081,904	21.2	15.2	16.6	47.0	0.0
Median Family Income - Atlanta MSA		\$67,322	Median Housing Value			\$226,906
			Median Gross Rent			\$1,059
			Families Below Poverty Level			10.3%

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

The *Bureau of Labor Statistics* reflects that unemployment rates for all counties in the assessment area declined from 2018 to 2019. However, in 2020, unemployment rates increased, due largely to COVID-19 pandemic-induced job losses. Unemployment rates were in line with or below the state and/or national rates in all three years. The below table shows the average annual unemployment rates and trends for the assessment area counties, state, and nation during the evaluation period.

Unemployment Rates			
Area	2018	2019	2020
	%	%	%
Cobb County	3.4	3.0	5.7
DeKalb County	4.0	3.4	7.6
Forsyth County	3.2	2.8	4.5
Fulton County	4.0	3.5	7.7
Gwinnett County	3.5	3.0	6.1
Georgia	4.0	3.4	6.6
National Average	3.9	3.7	8.1
<i>Source: Bureau of Labor Statistics</i>			

In 2020, the top industries in this assessment area were services, followed by non-classifiable establishments; finance, insurance, and real estate; and retail trade. The top employers were Delta Air Lines Inc., Emory University, The Home Depot Inc., and Northside Hospital.

Competition

The assessment area is highly competitive in the financial services market. The June 30, 2020 Summary of Deposits revealed 65 FDIC-insured institutions operated 805 branches within this area. Of these institutions, The Piedmont Bank ranked 20th with a 0.5 percent market share. The top five financial institutions accounted for 75.2 percent of the deposit market share and include Bank of America, Truist Bank, Wells Fargo Bank, JPMorgan Chase Bank, and Ameris Bank.

The Piedmont Bank is not required to collect or report its small business loan data and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate reported data, however, reflects the level of demand for small business loans and is relevant to understand the level of competition in the bank’s assessment area. According to 2019 Peer Small Business Data, 210 reporting institutions originated 124,413 small business loans totaling \$3.9 billion in the assessment area, indicating an extremely significant level of competition for small business loans. Two of the top five lenders, including the lender with the largest market share (29.1 percent), do not have branches in the bank’s assessment area. The top three lenders accounted for 55.6 percent of small business loans in 2019.

There is also an extremely significant level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to 2019 Peer Mortgage Data, 785 reporting institutions originated 139,562 home mortgage loans totaling \$42.6 billion in the assessment area. The Piedmont Bank ranked 271st with less than a 0.1 percent market share by number of loans. Two of the top five lenders do not have branches in the bank’s assessment area. The top three lenders accounted for 17.7 percent of the home mortgage loans in 2019.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs in the area. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available.

Examiners used an existing contact from a representative of an economic development organization in the assessment area, which works to connect businesses and entrepreneurs with the resources they need to start, relocate, or expand operations in Fulton County. The contact stated the organization was heavily involved in assisting local businesses acquire PPP loans at the beginning of the COVID-19 pandemic and continues to provide assistance in achieving loan forgiveness on those loans. It was noted during the discussion that the economic impact of the COVID-19 pandemic has yet to be fully realized, but local businesses are expected to make a full recovery. While the contact was not aware of any credit needs that were unaddressed by local financial institutions, micro loans to small businesses is an ongoing need in the assessment area. Additionally, there are opportunities to assist individuals starting new businesses in obtaining start-up financing. Finally, the contact stated there is a high amount of competition among financial institutions in the area and those institutions are generally responsive to community needs.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined that small business loans represent a primary credit need of the assessment area. The significant percentage of businesses with gross annual revenues of \$1 million or less, 89.7 percent in 2019; the large number of businesses with four or fewer employees, 64.5 percent; and the information obtained from the community contact support the conclusion that there is a need for small business lending. Affordable housing also is a need, as 35.1 percent of families and 36.4 percent of households are low- or moderate-income. In addition, the median housing value of \$226,906 and relatively high median gross rent of \$1,059 within the assessment area support the need for affordable housing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ATLANTA MSA ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to the assessment area's credit needs. Lending in the Atlanta MSA assessment area represents 69.8 percent of the number of small business loans and 35.0 percent of the number of home mortgage loans.

Geographic Distribution

The overall geographic distribution of loans reflects reasonable penetration throughout the assessment area.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank's performance in low-income census tracts was slightly above demographics in 2019 but declined to well below demographics in 2020. However, the bank operates in a highly competitive market for small business loans and the low percentage of businesses therein indicates limited opportunities.

The bank's performance in moderate-income census tracts was above demographics in 2019. Performance declined in 2020, but was comparable to demographics.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	4.8	9	5.8	3,717	6.7
2020	4.8	12	1.6	2,067	1.8
Moderate					
2019	17.2	33	21.3	11,743	21.0
2020	17.7	121	16.4	23,046	20.0
Middle					
2019	25.3	39	25.2	15,463	27.7
2020	23.7	141	19.2	26,252	22.8
Upper					
2019	52.0	74	47.7	24,871	44.6
2020	53.0	459	62.4	63,600	55.3
Not Available					
2019	0.7	--	--	--	--
2020	0.7	3	0.4	102	0.1
Totals					
2019	100.0	155	100.0	55,794	100.0
2020	100.0	736	100.0	115,067	100.0

Source: 2019 and 2020 D&B Data and Bank Records. Due to rounding, totals may not equal 100.0%.

Home Mortgage Lending

The geographic distribution of home mortgage lending is poor. The bank did not originate any loans in low-income census tracts in 2019 or 2020. In 2018, bank performance in low-income census tracts, 9.1 percent, exceeded both aggregate performance (2.9 percent) and demographics (3.0 percent). The low level of owner-occupied housing units within low-income census tracts indicates limited lending opportunities.

In 2018 and 2019, no loans were originated in moderate-income census tracts. In 2020, bank lending in moderate-income census tracts increased to 12.2 percent, which was slightly below demographics.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	3.0	3.1	0	0.0	0	0.0
Moderate						
2019	14.2	13.3	0	0.0	0	0.0
Middle						
2019	26.1	26.4	5	18.5	1,608	10.6
Upper						
2019	56.6	57.2	22	81.5	13,509	89.4
Not Available						
2019	0.0	0.1	0	0.0	0	0.0
Totals						
2019	100.0	100.0	27	100.0	15,117	100.0

Source: 2015 ACS Data; 2019 Aggregate HMDA Data; and 2019 Bank HMDA Data. Due to rounding, totals may not equal 100.0%.

Borrower Profile

The overall distribution of borrowers reflects poor penetration among businesses of different sizes and borrowers of different income levels.

Small Business Lending

The distribution of core small business loans reflects poor penetration to businesses of different sizes. In 2019, bank lending to small businesses (those with gross annual revenues of \$1 million or less) was significantly below the percentage of small businesses within the assessment area. Bank lending was similar to the bank’s performance at the prior evaluation.

In 2020, core small business lending declined 17.0 percent. Although not reflected in the below table, the bank originated 542 PPP loans totaling \$44.9 million within this assessment area. These loans were designed to provide assistance to small businesses during the COVID-19 pandemic.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	89.7	22	46.8	8,331	47.2
2020	91.2	14	29.8	4,193	21.9
>1,000,000					
2019	4.0	25	53.2	9,330	52.8
2020	3.2	33	70.2	14,942	78.1
Revenue Not Available					
2019	6.3	-	-	-	-
2020	5.6	-	-	-	-
Totals					
2019	100.0	47	100.0	17,661	100.0
2020	100.0	47	100.0	19,135	100.0

Source: 2019 and 2020 D&B Data and Bank Records.

Home Mortgage Lending

The distribution of distribution of borrowers reflects poor penetration among borrowers of different income levels. Bank lending to low-income borrowers in 2018, 9.1 percent, exceeded both aggregate performance (5.2 percent) and demographics (20.2 percent). However, the bank did not originate any loans to low-income borrowers in 2019 and 2020. In 2019, bank lending to moderate-income borrowers was significantly below both aggregate performance and demographics. However, income data was not available for the majority of home loans in 2019.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	20.2	4.8	0	0.0	0	0.0
Moderate						
2019	14.9	14.7	1	3.7	1,128	7.5
Middle						
2019	16.4	18.8	0	0.0	0	0.0
Upper						
2019	48.4	45.9	4	14.8	1,923	12.7
Not Available						
2019	0.0	15.8	22	81.5	12,066	79.8
Totals						
2019	100.0	100.0	27	100.0	15,117	100.0

Source: 2015 ACS Data; 2019 Aggregate HMDA Data; and 2019 Bank HMDA Data. Due to rounding, totals may not equal 100.0%.

COMMUNITY DEVELOPMENT TEST

The Piedmont Bank has demonstrated adequate responsiveness to the community development needs of the Atlanta MSA assessment area through community development loans, qualified investments, and community development services.

Community Development Loans

The bank originated 24 community development loans totaling \$37.8 million in the assessment area. This amount represents 70.6 percent by number and 73.2 percent by dollar volume of total community development loans originated during the evaluation period. The below table details the bank's community development lending activity by year and purpose during the evaluation period.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2017	-	-	-	-	1	1,400	-	-	1	1,400
2018	-	-	2	300	1	14,000	-	-	3	14,300
2019	-	-	1	2,100	-	-	-	-	1	2,100
2020	-	-	6	2,317	-	-	9	13,565	15	15,882
2021	-	-	-	-	1	279	3	3,806	4	4,085
Total	-	-	9	4,717	3	15,679	12	17,371	24	37,767

Source: Bank Records

Below are examples of community development loans originated in this assessment area during the evaluation period:

- One loan totaling \$14,000,000 was originated to a DeKalb County governmental agency to retire bonds issued as part of a strategic plan for redevelopment. The county issued the bonds to buy properties in a moderate-income census tract to restore economic development in the area.
- One loan totaling \$160,000 was to refinance a real estate loan for a non-profit organization, which provides shelter and recovery for drug and alcohol addiction in Gwinnett County.
- One loan totaling \$1,215,274 was to renew a purchase loan for a building that houses a non-profit organization, which provides clothing, food, household goods, hygiene kits, comfort items, and educational aids to those affected by homelessness, abuse, and poverty.
- Thirteen PPP loans totaling \$13,206,150 were made to businesses in low- and moderate-income census tracts and to non-profit organizations that provide services to low- and moderate-income individuals.

Qualified Investments

The Piedmont Bank purchased one bond totaling \$599,000 and provided 61 donations totaling \$277,000 within this assessment area. The donations support agencies and organizations that provide affordable housing and community services targeted to low- and moderate-income residents, as well as that promote economic development. The level of qualified investments in this assessment area represents 92.5 percent by number and 48.1 percent by dollar volume of the total qualified investments made during the evaluation period. Below are examples of qualified investments originated within this assessment area during the evaluation period:

- A \$598,703 municipal bond was purchased to redevelop Gwinnett Place Mall, which is located in a moderate-income census tract in Gwinnett County.
- From 2018 through 2021, the bank made 7 donations totaling \$51,700 to a non-profit organization, which provides grants to other non-profit organizations, serving low-and moderate-individuals.
- From 2018 through 2021, the bank made 9 donations to a public-private initiative dedicated to attracting and retaining jobs, cultivating capital investment, supporting educational institutions, and fostering workforce development in Gwinnett County.
- From 2019 through 2021, the bank made 5 donations to a non-profit organization, which works to decrease homelessness in the assessment area.

Community Development Services

The Piedmont Bank employees conducted 19 instances of community development services that benefited this assessment area. The below table details those services by year.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2017	-	1	1	-	2
2018	-	3	2	-	5
2019	-	5	2	-	7
YTD 2020	-	3	2	-	5
Total	-	12	7	-	19

Source: Bank Records

Below are examples of notable community development services provided in the Atlanta MSA assessment area:

- From 2017 to present, an employee has served as a Board member for a non-profit organization, which promotes economic development in DeKalb County.

- From 2017 through 2019, a member of bank management served as a Board member for a non-profit organization, which provides healthcare services including wellness examinations, preventative care, and chronic disease management to low- and moderate-income individuals and families.
- In 2018 and 2019, several employees participated in an event to provide financial literacy education to schools, where a majority of students receive free or reduced-priced meals.

NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NON-MSA ASSESSMENT AREA

The Non-MSA assessment area consists of Fannin, Jackson, and White Counties, in their entireties. The bank operates three, or 30 percent, of its branch offices in the Non-MSA assessment area. The assessment area accounts for 17.3 percent of total loans and 29.4 percent of bank-wide deposits.

Economic and Demographic Data

The below table presents demographic information from the 2015 ACS census and 2020 D&B data.

Demographic Information of the Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	0.0	47.6	52.4	0.0
Population by Geography	112,953	0.0	0.0	50.5	49.5	0.0
Housing Units by Geography	56,239	0.0	0.0	56.4	43.6	0.0
Owner-Occupied Units by Geography	31,973	0.0	0.0	50.7	49.3	0.0
Occupied Rental Units by Geography	9,901	0.0	0.0	59.5	40.5	0.0
Vacant Units by Geography	14,365	0.0	0.0	66.9	33.1	0.0
Businesses by Geography	10,533	0.0	0.0	51.4	48.6	0.0
Farms by Geography	465	0.0	0.0	47.5	52.5	0.0
Family Distribution by Income Level	30,527	16.7	13.9	19.0	50.4	0.0
Household Distribution by Income Level	41,874	18.5	13.9	15.5	52.0	0.0
Median Family Income - Non-MSA GA		\$45,886	Median Housing Value			\$159,045
			Median Gross Rent			\$752
			Families Below Poverty Level			13.1%

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

The *Bureau of Labor Statistics* indicates unemployment rates for all counties in the assessment area declined from 2018 to 2019. However, for 2020, unemployment rates increased, due largely to COVID-19 pandemic-induced job losses. Unemployment rates were in line with or below the state and national rates in all three years. The below table reflects the average annual unemployment rates and trends for the assessment area counties, state, and nation during the evaluation period.

Unemployment Rates			
Assessment Area	2018	2019	2020
	%	%	%
Fannin County	4.0	3.3	4.2
Jackson County	3.1	2.7	4.5
White County	3.0	2.7	4.1
Georgia	4.0	3.5	6.6
National Average	3.9	3.7	8.1
<i>Source: Bureau of Labor Statistics</i>			

In 2020, the top industries in this assessment area were services, followed by non-classifiable establishments; retail trade; construction; and, finance, insurance, and real estate. The top employers were Walmart Supercenter (Fannin County), Four Season at Embarcadero (Fannin County), Jackson Electric Membership (Jackson County), TenCate Geosynthetics (Jackson County), Freudenberg-NOK Sealing Technologies (White County), and Walmart Supercenter (White County).

Competition

The assessment area is highly competitive in the financial services market. The June 30, 2020 Summary of Deposits revealed 11 FDIC-insured institutions operated 25 branches within this area. Of these institutions, The Piedmont Bank ranked 2nd with a 15.3 percent market share. The top five financial institutions accounted for 83.8 percent of the deposit market share and included United Community Bank, The Piedmont Bank, South State Bank, Bank Ozk, and Regions Bank.

Aggregate reported data reflects the level of demand for small business loans and is relevant to understand the level of competition in this assessment area. According to 2019 Peer Small Business Data, 76 reporting institutions originated 2,955 small business loans totaling \$100.0 million in the assessment area, indicating a significant level of competition for small business loans. The lender with the largest market share (20.3 percent) does not have branches in the bank’s assessment area. The top three lenders accounted for 38.9 percent of small business loans in 2019.

There is an extremely significant level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. According to 2019 Peer Mortgage Data, 341 reporting institutions originated 6,925 home mortgage loans totaling \$1.5 billion in the assessment area. The Piedmont Bank ranked 37th with a 0.6 percent market share by number of loans. Two of the top five lenders did not have branches in the bank’s assessment area. The top three lenders accounted for 18.5 percent of home mortgage loans in 2019.

Credit and Community Development Needs and Opportunities

Considering demographic and economic data, examiners determined small business loans represent a primary credit need in the assessment area. The significant percentage of businesses with gross annual revenues of \$1 million or less (88.6 percent in 2019) and the large number of businesses with four or fewer employees (68.6 percent) support this conclusion. Affordable housing also is a need, as 30.6 percent of families and 32.4 percent of households are low- or moderate-income.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE NON-MSA ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to the assessment area's credit needs. Lending in the Non-MSA assessment area represents 22.2 percent of the number of small business loans and 49.0 percent of the number of home mortgage loans.

Geographic Distribution

This assessment area does not have any low- or moderate-income census tracts, and a review of the Geographic Distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

Borrower Profile

The overall distribution of borrowers reflects poor penetration among businesses of different sizes and borrowers of different income levels.

Small Business Lending

The distribution of small business loans reflects generally adequate penetration to businesses of different sizes. In 2019, core small business lending to small businesses was slightly below the percentage of small businesses in the assessment area.

In 2020, core small business lending declined to 56.5 percent. However, it is noted that 30.5 percent of businesses did not provide income data, due to certificates of deposit being used as collateral. Although not reflected in the below table, the bank originated 121 PPP loans totaling \$7.8 million within this assessment area. These loans were designed to provide assistance to small businesses during the COVID-19 pandemic.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	88.6	18	81.8	2,911	87.8
2020	89.7	13	56.5	1,529	58.9
>1,000,000					
2019	3.1	4	18.2	404	12.2
2020	2.7	3	13.0	297	11.5
Revenue Not Available					
2019	8.3	-	-	-	-
2020	7.6	7	30.5	768	29.6
Totals					
2019	100.0	22	100.0	3,315	100.0
2020	100.0	23	100.0	2,594	100.0
<i>Source: 2019 and 2020 D&B Data and Bank Records</i>					

Home Mortgage Lending

The distribution of home mortgage loans reflects poor penetration among borrowers of different income levels. The bank did not originate any loans to low-income borrowers in 2018. In 2019, the bank’s lending performance to low-income borrowers increased and exceeded aggregate performance but fell below demographics. In 2020, the bank did not originate any loans to low-income borrowers.

In 2018, performance to moderate-income borrowers (6.8 percent) was slightly below aggregate data (7.4 percent) and approximately half of demographics (13.9 percent). In 2019, the bank’s lending performance to moderate-income borrowers was comparable to aggregate performance but below demographics. In 2020, bank lending in the moderate-income census tracts increased to 11.9 percent and was slightly below demographics.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	16.7	1.5	2	5.0	184	2.5
Moderate						
2019	13.9	6.9	3	7.5	244	3.3
Middle						
2019	19.0	16.6	5	12.5	388	5.3
Upper						
2019	50.4	57.5	23	57.5	5,451	74.7
Not Available						
2019	0.0	17.5	7	17.5	1,035	14.2
Totals						
2019	100.0	100.0	40	100.0	7,302	100.0

Source: 2015 ACS Data; 2019 Aggregate HMDA Data; and 2019 Bank HMDA Data. Due to rounding, totals may not equal 100.0%.

COMMUNITY DEVELOPMENT TEST

Overall, The Piedmont Bank has demonstrated adequate responsiveness to the community development needs of the Non-MSA assessment area through community development loans, qualified investments, and community development services.

Community Development Loans

During the evaluation period, the bank originated six community development loans totaling \$10.1 million. This amount represents 17.6 percent by number and 19.7 percent by dollar volume of total community development loans originated. The below table shows community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2017	-	-	-	-	-	-	-	-	-	-
2018	-	-	-	-	1	3,778	-	-	1	3,778
2019	-	-	-	-	1	1,000	-	-	1	1,000
2020	-	-	1	14	3	5,355	-	-	4	5,369
2021	-	-	-	-	-	-	-	-	-	-
Total	-	-	1	14	5	10,133	-	-	6	10,147

Source: Bank Records

Below are examples of community development loans originated in this assessment area during the evaluation period:

- One loan totaling \$3,777,960 was made to purchase a building that will contain a non-profit organization, which assists with economic development in Fanning County.
- Three loans were made to a community development financial institution that provides funding for coaching, capital, and connections to create and grow small businesses. A line of credit was originated for \$1,000,000 and was renewed during the evaluation period for \$2,000,000. In addition, a PPP loan was made totaling \$335,000.
- One loan totaling \$14,000 was made to a non-profit organization, which assists individuals and families that experience homelessness.

Qualified Investments

Qualified investments within this assessment area included four donations totaling approximately \$1,000 to community development organizations. The level of qualified investments and donations in this assessment area represents 6.0 percent by number and approximately 0.1 percent by dollar volume of total qualified investments during the evaluation period.

The bank donated to agencies and organizations that provide community services targeted to low- and moderate-income residents, as well as to promote economic development. Examples include donations to community development organizations that offer services to low- and moderate-income individuals and a non-profit economic development organization.

Community Development Services

The Piedmont Bank employees conducted six instances of community development services that benefited the Non-MSA assessment area. The below table details the community development services benefitting the Non-MSA assessment area by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2017	-	-	-	-	-
2018	-	1	2	-	3
2019	-	-	2	-	2
YTD 2020	-	-	1	-	1
Total	-	1	5	-	6
<i>Source: Bank Records</i>					

Below are examples of community development services provided in this assessment area:

- From 2018 through 2020, an employee served as a Board member for a non-profit organization, which promotes economic development in Fanning County.
- In 2018 and 2019, an employee served as a Board member for a non-profit organization, which promotes economic development in White County.

GAINESVILLE MSA ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GAINESVILLE MSA ASSESSMENT AREA

The Gainesville MSA assessment area consists of Hall County. The bank operates one, or 10 percent, of its branch offices in the Gainesville MSA assessment area. The assessment area accounts for 9.5 percent of total loans and 2.5 percent of bank-wide deposits.

Economic and Demographic Data

The below table presents demographic information from the 2015 ACS census and 2020 D&B data.

Demographic Information of the Gainesville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	5.6	19.4	41.7	33.3	0.0
Population by Geography	187,916	6.1	18.9	42.3	32.8	0.0
Housing Units by Geography	69,302	5.4	16.2	45.4	33.0	0.0
Owner-Occupied Units by Geography	41,434	1.2	12.4	44.6	41.8	0.0
Occupied Rental Units by Geography	20,558	13.1	25.1	43.7	18.1	0.0
Vacant Units by Geography	7,310	7.3	12.4	55.0	25.3	0.0
Businesses by Geography	18,032	9.2	16.3	41.7	32.8	0.0
Farms by Geography	579	3.6	15.7	43.4	37.3	0.0
Family Distribution by Income Level	45,810	20.6	18.0	20.3	41.0	0.0
Household Distribution by Income Level	61,992	22.5	17.0	18.8	41.7	0.0
Median Family Income – Gainesville MSA		\$58,558	Median Housing Value			\$161,600
			Median Gross Rent			\$908
			Families Below Poverty Level			14.3%
Source: 2015 ACS and 2020 D&B Data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.						

Competition

The June 30, 2020 Summary of Deposits revealed 16 FDIC-insured institutions operated 44 branches within this area. Of these institutions, The Piedmont Bank ranked 16th with a 0.5 percent market share. The top five financial institutions accounted for 74.2 percent of the deposit market share and include Wells Fargo Bank, Truist Bank, Regions Bank, United Community Bank, and Bank of America, NA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE GAINESVILLE MSA ASSESSMENT AREA

LENDING TEST

During the review period, the bank originated 19 home mortgage loans totaling \$4.0 million in 2019. The bank originated 31 small business loans totaling \$10.9 million in 2019 and 71 small business loans totaling \$8.4 million in 2020. The small business sample reviewed for borrower profile included 11 loans totaling \$3.9 million in 2019 and 9 loans totaling \$2.6 million in 2020.

Concerning Geographic Distribution, small business lending in the Gainesville MSA assessment area is generally consistent with performance in the Atlanta MSA assessment area; home mortgage lending was better in this assessment area than in the Atlanta MSA assessment area. Concerning Borrower Profile, small business lending in this assessment area was better than the performance in the Atlanta MSA but comparable to performance in the Non-MSA assessment area. Home mortgage lending in the Gainesville MSA assessment area was comparable to performance in the other two assessment areas.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout this assessment area.

The bank's small business lending performance reflects reasonable penetration throughout the assessment area. In 2019, performance in low-income census tracts (12.9 percent) exceeded demographics (9.2 percent). Performance in 2020 declined slightly (10.9 percent) but remained slightly above demographics (9.2 percent). In 2019, small business lending in moderate-income census tracts (9.7 percent) was significantly below demographics (16.7 percent). Performance increased in 2020 to 21.9 percent and exceeded demographics (16.3 percent).

The bank's home mortgage lending performance reflects reasonable penetration throughout the assessment area. In 2019, the bank's performance in low-income census tracts (10.5 percent) significantly exceeded aggregate lending (0.6 percent) and demographics (1.2 percent). Bank performance in moderate-income census tracts in 2019 (10.5 percent) was slightly below aggregate lending (12.8 percent) and demographics (12.4 percent).

Borrower Profile

The distribution of borrowers reflects an overall reasonable penetration among businesses of different sizes and individuals of different income levels throughout the assessment area.

The distribution of borrowers reflects a reasonable penetration among businesses of different sizes. In 2019, the bank originated 90.9 percent of its loans to small businesses but was slightly above the demographics (87.1 percent of businesses with GARs of \$1 million or less.) In 2020, the bank's performance declined significantly to 44.4 percent of its loans to small businesses and was well below the demographics (88.5 percent of businesses were small businesses). In 2020, the bank originated 46 PPP loans totaling \$2.9 million within this assessment area. These loans were designed to provide assistance to small businesses during the COVID-19 pandemic.

For home mortgage loans, the bank's performance reflects poor penetration to individuals of different income levels within the assessment area. The bank has not originated any loans to low- or moderate-income borrowers. However, the bank has a limited presence in this assessment area, with the one branch office located in the northern portion of the assessment area. The low aggregate lending to low-income borrowers (5.1 percent) and to moderate-income borrowers (17.3 percent) indicates limited opportunities within this assessment area, which also includes significant competition.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance in the Gainesville assessment area is consistent with the institution's community development performance overall.

The bank originated four community development loans totaling \$3.7 million within this assessment area. This activity represents 11.8 percent by number and 7.2 percent by dollar amount of the total community development loans originated during the review period.

The bank also purchased one qualified investment totaling \$944,000 that represents 1.5 percent by number and 51.8 percent by dollar volume, of the total qualified investments during the review period.

Bank personnel performed two community development services in the assessment area during the review period. This represents 7.4 percent of total community development services.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to the area's community development needs considering the amount and combination of these activities, along with their qualitative aspects.

GLOSSARY

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

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

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

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

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

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

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

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

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

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

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

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

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

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

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

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

CRA Public File Section 3:

Branch Information

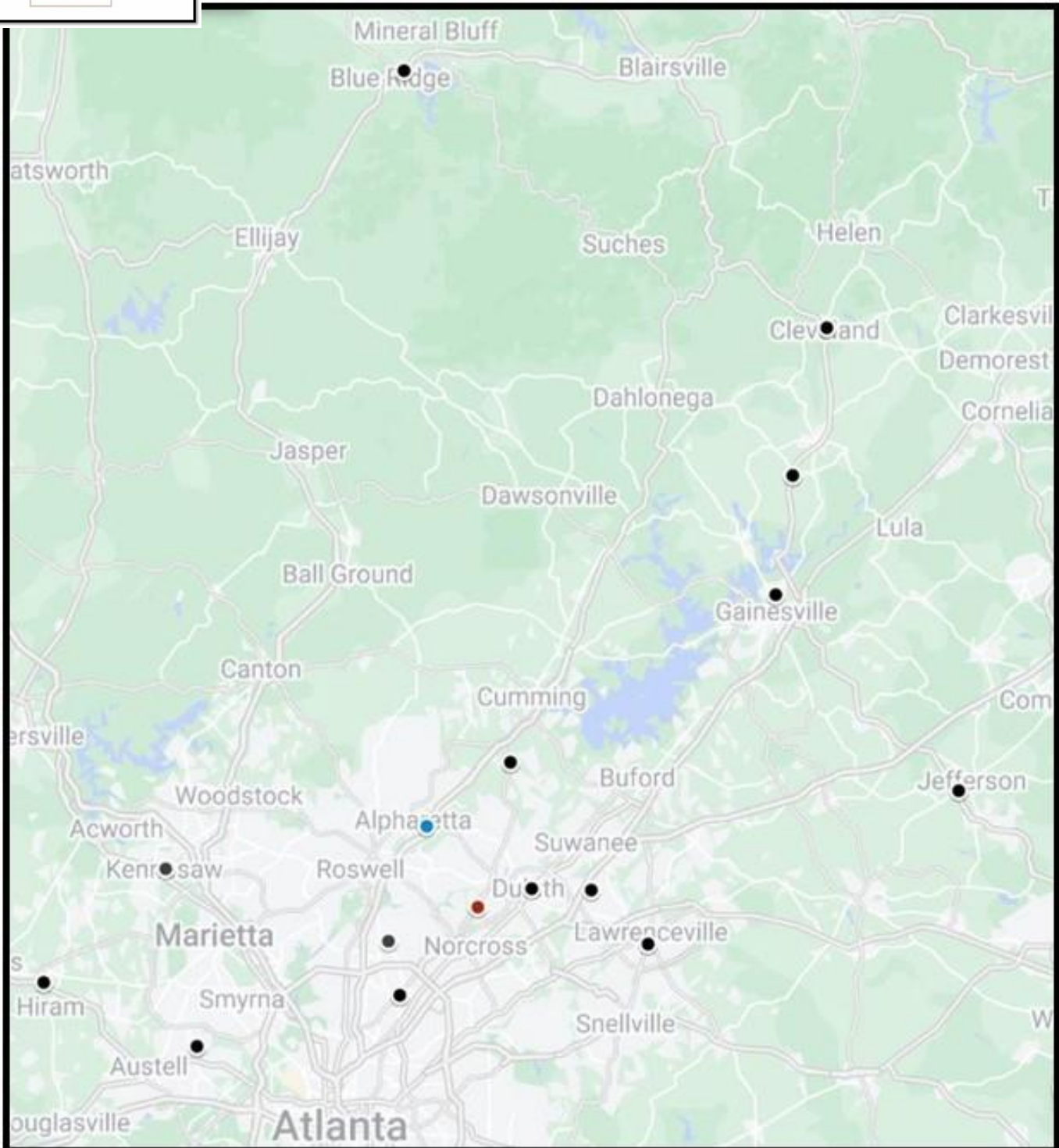
BRANCHES – see current branch listing on page 43.

Branches Opened or Closed:

- The Piedmont Bank opened for business at the Norcross (Peachtree Corners) Branch on July 1, 2009 and this location was designated as the main office.
- The Old Peachtree Branch opened for business on July 1, 2009.
- The Lawrenceville Branch opened for business on May 4, 2015.
- The Forsyth Loan Production Office (LPO) opened for business on April 19, 2016. This production office was closed on April 18, 2018.
- The Chamblee/Brookhaven Branch opened for business on December 22, 2017.
- Mountain Valley Community Bank was acquired by The Piedmont Bank on September 6, 2017.
- The Forsyth Branch opened for business on April 18, 2018.
- The Blue Ridge LPO converted to a full-service branch on April 30, 2018. The location did not change.
- The Duluth LPO converted to a full-service branch in December 2019.
- Westside Bank was acquired by The Piedmont Bank on February 4, 2020.
- The Gainesville Branch opened in December 2021.
- The Avalon LPO opened on November 1, 2023.
- The Kennesaw Branch opened on January 1, 2024.



The Piedmont Bank Locations



● **Home Office**
Peachtree Corners

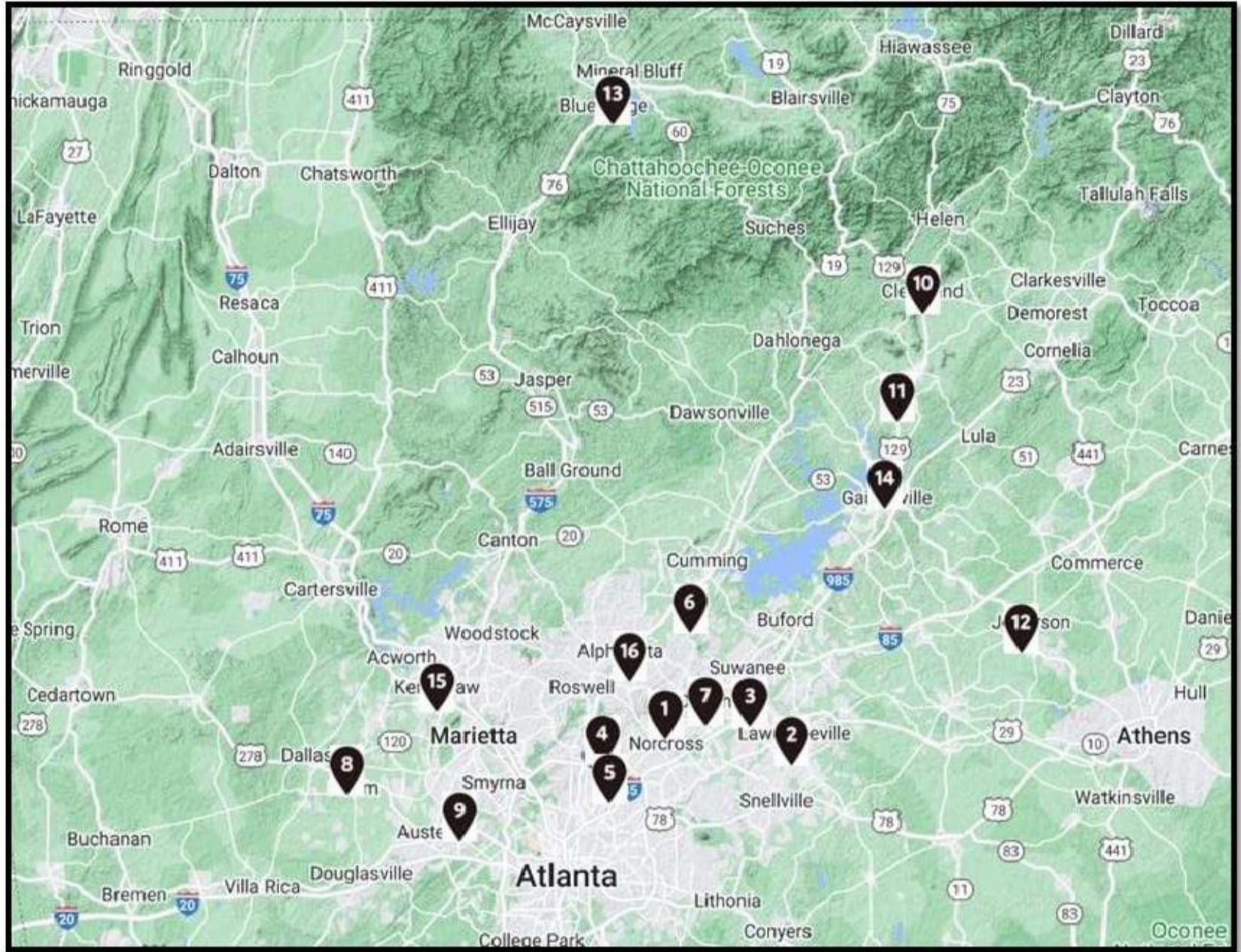
● **LPO**
Avalon

● **Branches**
(See next page)

The Piedmont Bank



- 1 **Peachtree Corners (Home Office)**
5600 Peachtree Parkway
Peachtree Corners, GA 30092
770-246-0011
- 2 **Lawrenceville**
185 Gwinnett Drive
Lawrenceville, GA 30046
678-736-6250
- 3 **Old Peachtree Road**
1035 Old Peachtree Road NW
Lawrenceville, GA 30043
678-638-4000
- 4 **Dunwoody**
1725 Mount Vernon Rd
Dunwoody, Georgia 30338
770-390-0900
- 5 **Chamblee/Brookhaven**
5070 Peachtree Blvd, Suite B1
Chamblee, GA 30341
770-351-6303
- 6 **Forsyth**
1045 Peachtree Parkway
Cumming, GA 30041
770-886-6339
- 7 **Duluth**
3112 Main Street Suite 100
Duluth, GA 30096
678-534-2145
- 8 **Hiram**
56 Hiram Drive
Hiram, GA 30141
770-445-1855
- 9 **Mableton**
4901 Floyd Road
Mableton, GA 30126
678-223-7200
- 10 **Cleveland**
136 North Main Street
Cleveland, GA 30528
706-348-6822
- 11 **North Hall**
5140 Cleveland Highway
Gainesville, GA 30506
770-983-2201
- 12 **Jefferson**
P.O. Box 757
1420 Winder Highway
Jefferson, GA 30549
706-387-7416
- 13 **Blue Ridge**
111 Collins Ave
Blue Ridge, GA 30513
706-946-2265
- 14 **Gainesville**
995 Riverside Drive
Gainesville, GA 30501
470-824-3001
- 15 **Kennesaw**
2243 Lewis St
Kennesaw, GA 30144
470-622-5070
- 16 **Avalon (LPO)**
2775 Old Milton Pkwy
Alpharetta, GA 30009
470-615-6320





CRA Public File Section 4:

The Piedmont Bank Services

Hours of Operation at Piedmont Bank Branches:

Peachtree Corners (*Branch, ATM, Night Drop*)
5100 Peachtree Parkway, Peachtree Corners, GA 30092
(770) 246-0011
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Fri 9:00 am – 4:00 pm

Lawrenceville (*Branch, ATM, Night Drop*)
185 Gwinnett Drive, Lawrenceville, GA 30046
(678) 736-6250
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Fri 9:00 am – 4:00 pm

Old Peachtree Road (*Branch, ATM, Night Drop*)
1035 Old Peachtree Road NW, Lawrenceville, GA 30043
(678) 638-4000
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Fri 9:00 am – 4:00 pm

Dunwoody (*Branch, ATM, Night Drop*)
1725 Mount Vernon Rd, Dunwoody, GA 30338
(770) 392-0900
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Fri 9:00 am – 4:00 pm

Chamblee/Brookhaven (*Branch, ATM, Night Drop*)
5070 Peachtree Blvd, Suite B110, Chamblee, GA 30341
(770) 351-630
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm

Forsyth (*Branch, ATM, Night Drop*)
1045 Peachtree Parkway, Cumming, GA 30041
(770) 886-6339
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Fri 9:00 am – 4:00 pm

Duluth (*Branch*)
3112 Main Street, Suite #100, Duluth, GA 30096
(678) 534-2145
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm

Hiram (*Branch, ATM, Night Drop*)
56 Hiram Drive, Hiram, GA 30141
(770) 445-1855
Lobby Hours:
Mon-Fri 9:00 am – 5:00 pm
Drive-Thru Hours:
Mon-Fri 8:30 am – 5:00 pm

Mableton (*Branch, ATM, Night Drop*)
4901 Floyd Road, Mableton, GA 30126
(678) 223-7200
Lobby Hours:
Mon-Thu 9:00 am – 4:00 pm
Fri 9:00 am – 5:00 pm
Drive-Thru Hours:
Mon-Fri 8:30 am – 5:00 pm

Cleveland (*Branch, ATM, Night Drop*)
136 North Main Street, Cleveland, GA 30528
(706) 348-6822
Lobby Hours:
Mon-Thu 8:55 am – 4:05 pm
Fri 8:55 am – 5:05 pm
Drive-Thru Hours:
Mon-Thu 8:25 am – 5:05 pm
Fri 8:25 am – 5:35 pm
Sat 8:25 am – 12:05 pm

North Hall (*Branch, ATM, Night Drop*)
5140 Cleveland Hwy, Gainesville, GA 30506
(770) 983-2201
Lobby Hours:
Mon-Thu 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Thu 9:00 am – 4:00 pm
Fri 9:00 am – 5:00 pm

Jefferson (*Branch, ATM, Night Drop*)
1420 Winder Hwy, Jefferson, GA 30549
(706) 387-7416
Lobby Hours:
Mon-Thu 9:00 am – 4:00 pm
Fri 9:00 am – 5:00 pm
Drive-Thru Hours:
Mon-Thu 8:30 am – 5:00 pm
Fri 8:30 am – 5:30 pm

Blue Ridge (*Branch, ATM, Night Drop*)
111 Collins Ave, Blue Ridge, GA 30513
(706) 946-2265
Lobby Hours:
Mon-Thu 9:00 am – 4:00 pm
Fri 9:00 am – 5:00 pm
Drive-Thru Hours:
Mon-Thu 8:30 am – 4:00 pm
Fri 8:30 am – 5:00 pm

Gainesville (*Branch, ATM, Night Drop*)
995 Riverside Drive, Gainesville, GA 30501
(470) 824-3001
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm
Drive-Thru Hours:
Mon-Thu 9:00 am – 4:00 pm
Fri 9:00 am – 5:00 pm

Kennesaw (*Branch*)
2243 Lewis Street, Kennesaw, GA 30144
(470) 622-5070
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm

Avalon* (*LPO*)
2775 Old Milton Pkwy, Ste 100, Alpharetta, GA 30009
(470) 615-6320
Lobby Hours:
Mon-Fri 9:00 am – 4:00 pm (by appointment only)

Loan & Deposit Products:
www.piedmont.bank

Loan Fees: Please see a Loan Officer for loan pricing information.

Other Fees: Please see the attached current fee schedule.



FEE SCHEDULE

Account Close Fee (within 90 days of opening)	\$20
Account Research (per hour)	\$20
ACH Fee (NACHA) (monthly)	\$25
Bags – Zipper	\$5
Bags – Lock	\$35
Buy/Sell Foreign Currency Fee (1% of Transaction Amount)	\$5 minimum
Delivery Fee (FedEx)	\$45
Cashier's Check	\$5
Cashier's Check (non-customers)	\$10
Charge Back/Return Item Fee	\$5
Collection Items	\$10
Copies of Checks, Deposit Tickets or Items Deposited (per item)	\$1
Courier Pick-Up	\$10
Debit Card Replacement Fee	\$5
Domestic Wire Outgoing/Incoming	\$20
Dormant Account Fee	\$25
eCorp Set-up Fee	\$125
Escheatment Fee	\$50
Fax Service Fee (per page)	\$1
Garnishment/Levy	\$100
International Wire Outgoing/Incoming	\$45
Notary Fee	\$2
Overdraft Transfer Fee (per occurrence)	\$5
Overdraft Fee-NSF (per item)	\$34
RDC Fee (monthly)	\$25
RDC Fee with Rental (monthly)	\$50
Return Item Fee (per item)	\$34
Return Mail Fee	\$5
Safe Deposit Boxes	
3x5	\$35
3x10	\$45
5x5	\$50
5x10	\$75
10x10	\$100
Safe Deposit Box Drilling Fee	\$310
Safe Deposit Box Lost Key	\$200
Statement Copy	\$3
Stop Item Charge (per item)	\$34
Subpoena Fee	\$100

CRA Public File Section 5:

HMDA Disclosures

The Piedmont Bank became subject to the requirements of the Home Mortgage Disclosure Act of as July 01, 2009. The bank is required to collect data regarding applications for, and originations and purchases of; home purchase loans, home improvements loans, and home refinancing loans for each calendar year beginning in 2009. The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.

CRA Public File Section 6:

Other Information

Community Development Services, Donations and Investments are monitored by the CRA Officer.
Please contact the bank's CRA Officer for information regarding the bank's CRA activity.

CRA Public File Section 7:

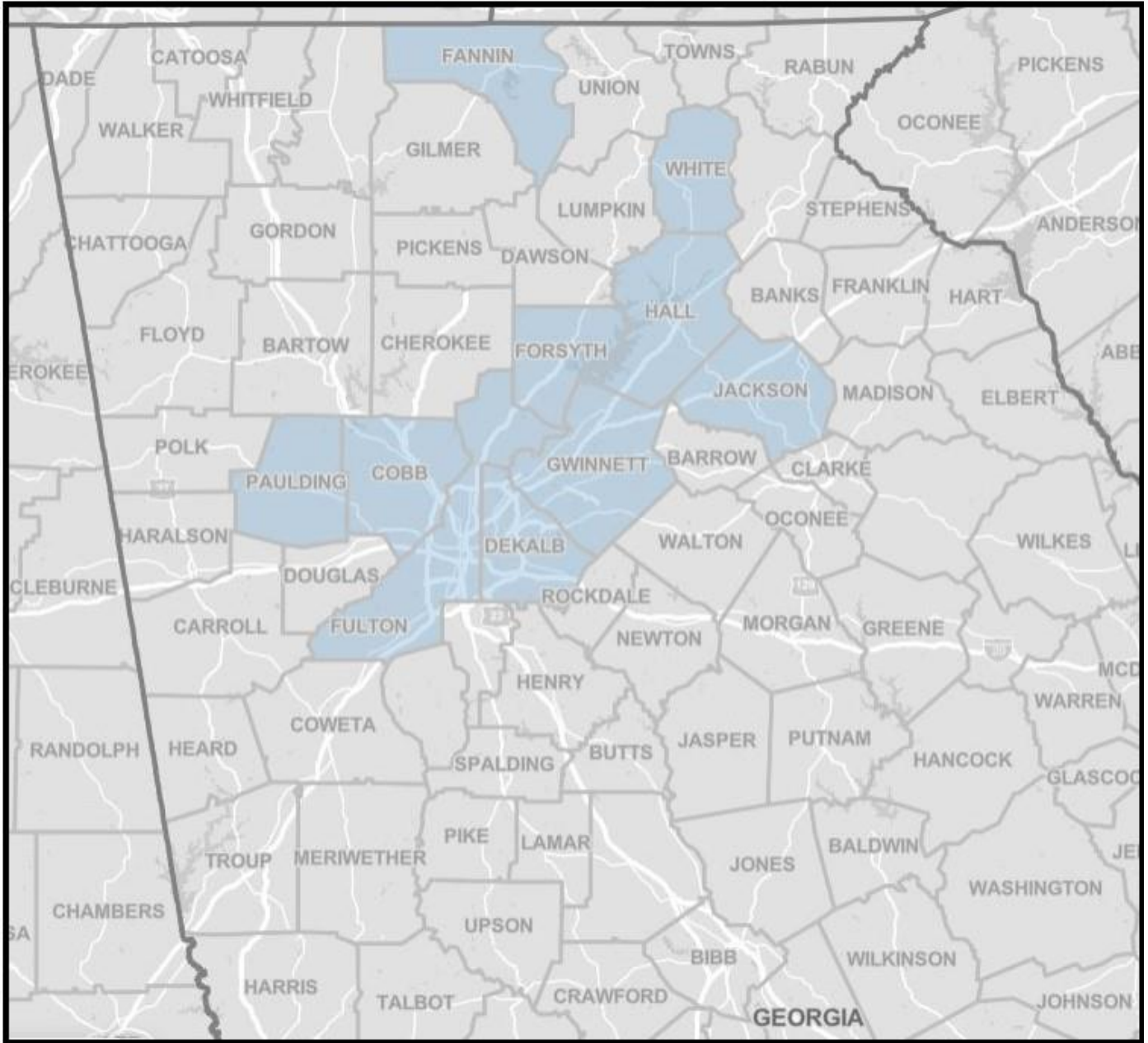
Assessment Area

The Piedmont Bank's assessment area includes the following counties: Cobb, DeKalb, Fannin, Forsyth, Fulton, Gwinnett, Hall, Jackson, Paulding, and White.

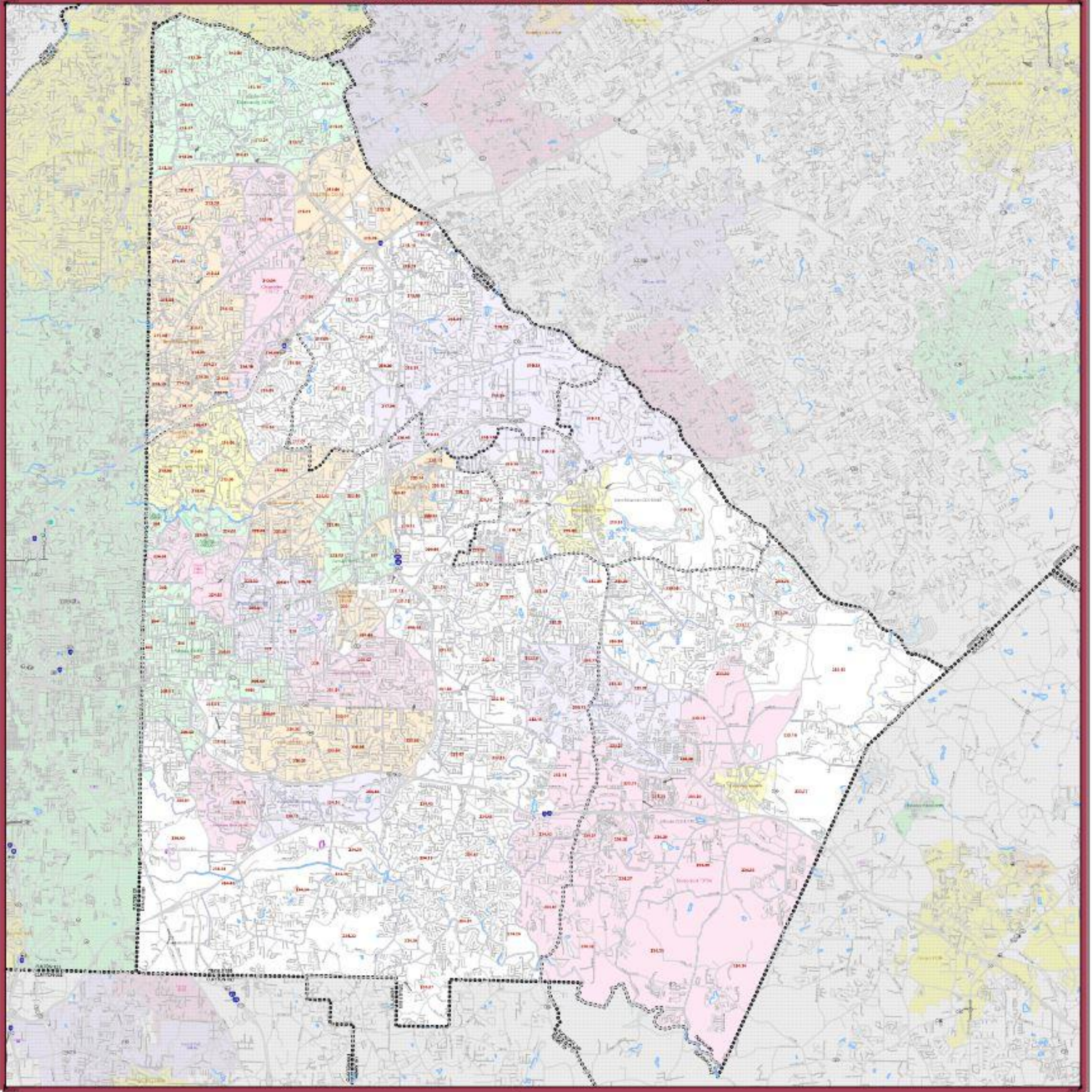


The Piedmont Bank Assessment Area

MSA/MD	Counties	# of Bank Offices
Atlanta-Sandy Springs-Roswell, GA - MD - 12054	DeKalb, Forsyth, Fulton, Gwinnett	8
Gainesville, GA- MSA- 23580	Hall	2
Marietta, GA- MD- 31924	Cobb, Paulding	3
Non-MSA, GA- 99999	Fannin, Jackson, White	3



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



Legend	Legend	Legend	Legend
Water	CRANES	Water	Water
Atlantic Ocean	CRANES	Water	Water
Chickamauga River	CRANES	Water	Water
Chattahoochee River	CRANES	Water	Water
DeKalb County	CRANES	Water	Water
...	CRANES	Water	Water
NEW HOME	Water	Water	Water
...	Water	Water	Water
CRANES	Water	Water	Water
...	Water	Water	Water

NOTES:

- 1. This map is a reference map and does not represent the official boundaries of any political jurisdiction.
- 2. The map is based on the 2010 Census of Population and Housing, Census Tracts and Small Areas, Summary File 1 (SF1), Table S001.
- 3. The map is based on the 2010 Census of Population and Housing, Census Tracts and Small Areas, Summary File 1 (SF1), Table S001.
- 4. The map is based on the 2010 Census of Population and Housing, Census Tracts and Small Areas, Summary File 1 (SF1), Table S001.

Scale: 1 inch = 10 miles

North Arrow

Source: U.S. Census Bureau, 2010 Census of Population and Housing, Census Tracts and Small Areas, Summary File 1 (SF1), Table S001.

Map: DeKalb County, GA

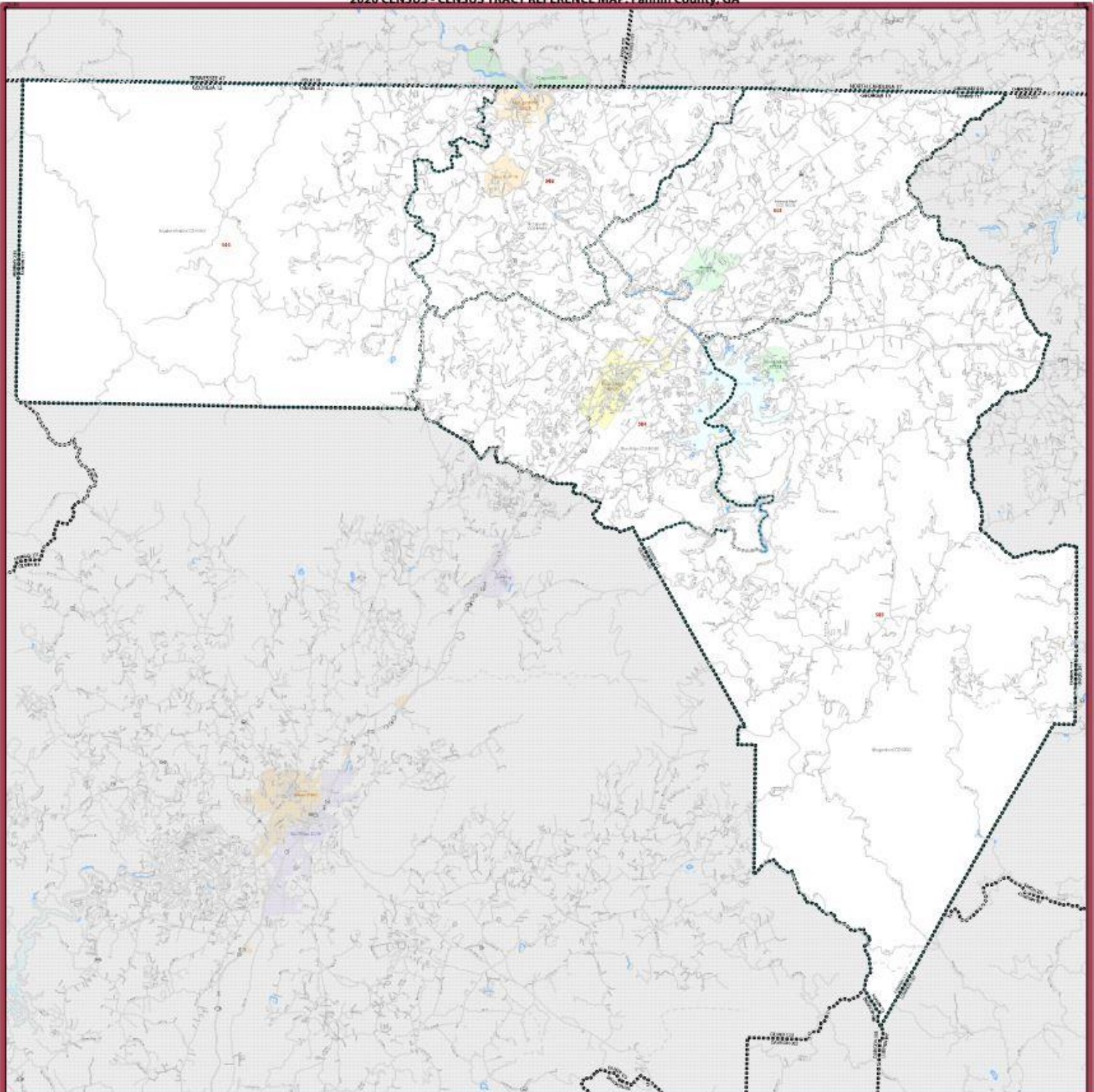
Scale: 1 inch = 10 miles

North Arrow

Source: U.S. Census Bureau, 2010 Census of Population and Housing, Census Tracts and Small Areas, Summary File 1 (SF1), Table S001.

Map: DeKalb County, GA

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



Legend	Legend	Legend	Legend

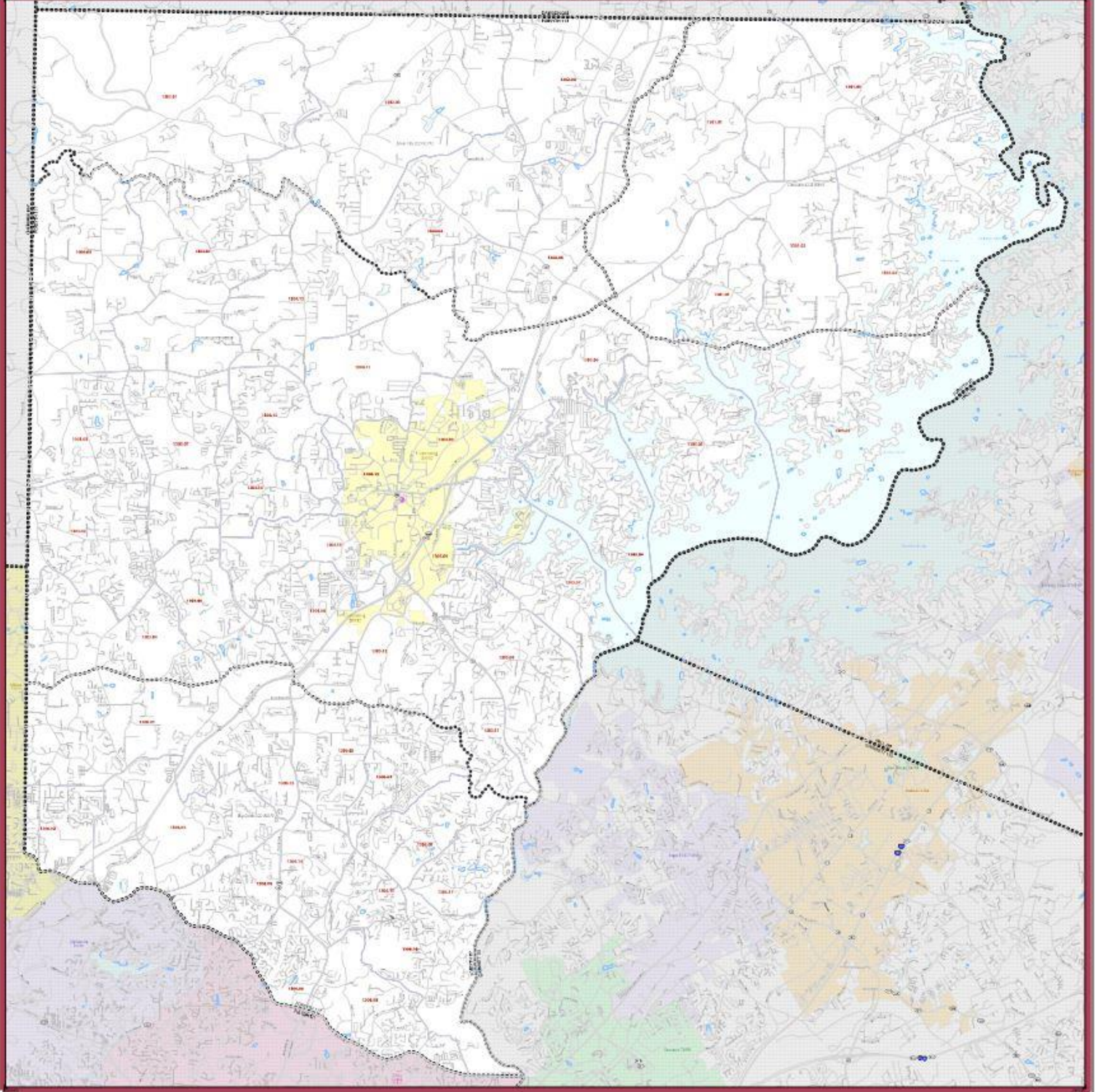
NOTES:

1. This map is a reference map for the 2020 Census and is not intended to be used for any other purpose.
2. The boundaries shown on this map are based on the 2020 Census data and may differ from other maps.
3. The map is not intended to be used for any other purpose.

Scale: 1 inch = 1 mile

State of Georgia
2020 Census

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



LEGEND

Interstate	State Route	County Road	Waterway	Water Body	Wetland	Forest	Agriculture	Urban	Residential	Commercial	Industrial	Public Use	Unimproved Land

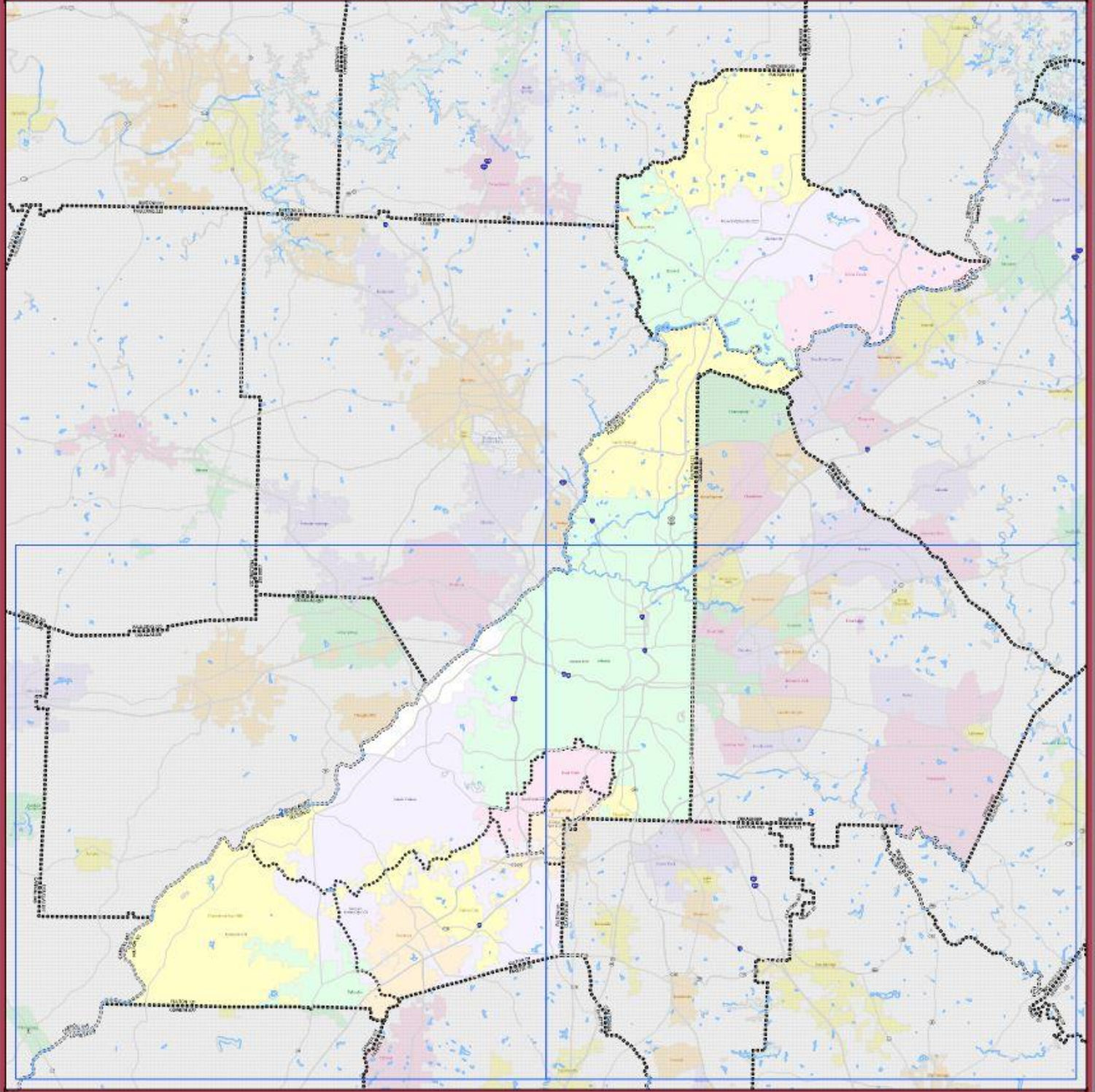
This map is a reference map for the 2020 Census. It shows the geographic boundaries of census tracts in Forsyth County, Georgia. The map is color-coded by tract, with a central urban area highlighted in yellow. Major roads and water bodies are also visible.

All data provided and derived as of 12/31/2020. The data is provided for informational purposes only and is not intended to be used for any other purpose. The data is provided as a reference only and is not intended to be used for any other purpose.

Prepared by: **2020 Census**
 Date: 12/31/2020
 Version: 1.0
 Contact: 2020 Census
 Phone: 1-800-368-0162
 Website: www.census.gov

Sheet 1 of 5: FARMERS Sherris
 Total Sherris: 2, Sherris: 0, Parcel: 1, 044010
 2020 Census Tract Reference Map
 Forsyth County, GA

2020 Census
 2020



LEGEND

Water Features	ROADS	BOUNDARIES	LEGEND	LEGEND
<ul style="list-style-type: none"> Major Waterway Waterway Canal Stream Swamp Bay Lake Reservoir Other Water Feature 	<ul style="list-style-type: none"> Interstate State Route County Road Local Road Other Road 	<ul style="list-style-type: none"> County Boundary Municipal Boundary Other Boundary 	<ul style="list-style-type: none"> City Town Village Other 	<ul style="list-style-type: none"> Other Other Other Other

NOTES:

- Map boundaries are shown within the 2010 Census Tract boundaries. The 2010 Census Tract boundaries are shown in black.
- Map boundaries are shown within the 2010 Census Tract boundaries. The 2010 Census Tract boundaries are shown in black.
- Map boundaries are shown within the 2010 Census Tract boundaries. The 2010 Census Tract boundaries are shown in black.

Scale: 1:100,000

North Arrow

Metadata:

Map of Fulton County, Georgia, showing census tracts. The map is color-coded by county: Fulton County is yellow, DeKalb County is green, and Spalding County is pink. Major roads like I-75, I-85, and I-20 are shown as thick lines. Water bodies are blue. The map is overlaid with a grid of latitude and longitude lines.

Legend:

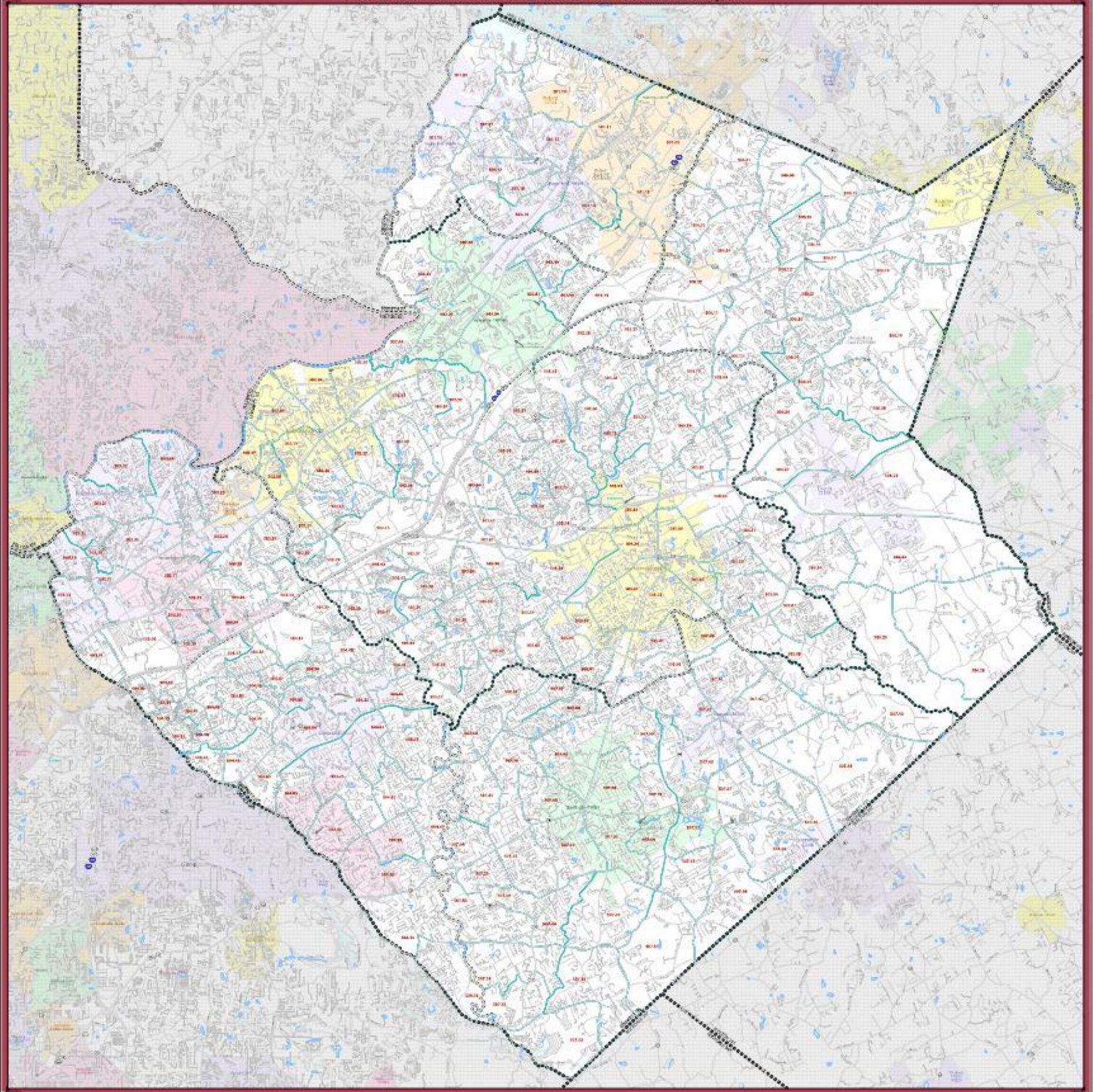
- City
- Town
- Village
- Other

Scale: 1:100,000

North Arrow

Metadata:

Map of Fulton County, Georgia, showing census tracts. The map is color-coded by county: Fulton County is yellow, DeKalb County is green, and Spalding County is pink. Major roads like I-75, I-85, and I-20 are shown as thick lines. Water bodies are blue. The map is overlaid with a grid of latitude and longitude lines.



LEGEND

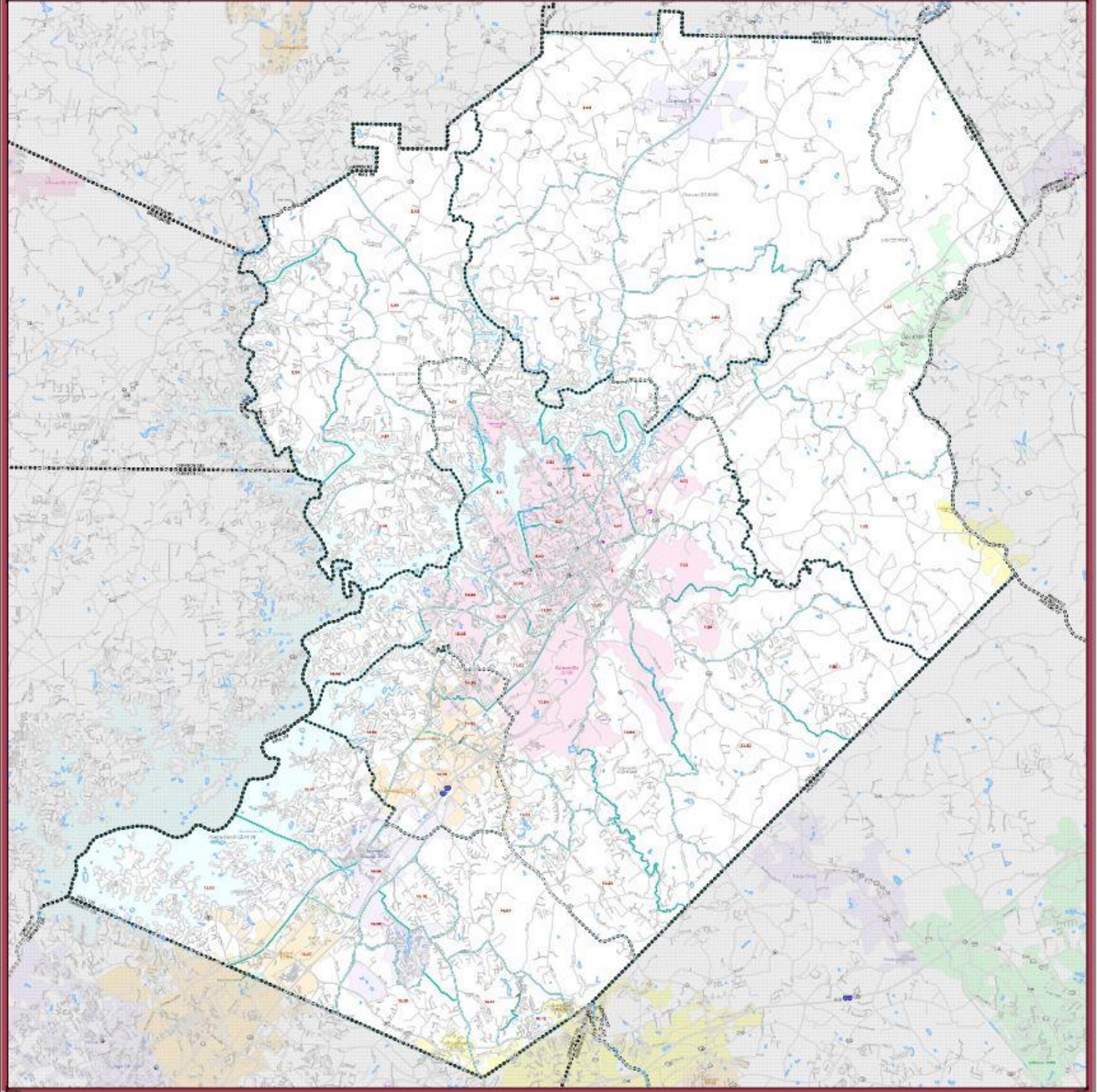
WATERWAYS	CANALS	ROADS	BOUNDARIES	POPULATION
Major Waterway	Canal	Interstate	County	100,000+
Minor Waterway	Canal	State	City	75,000-99,999
Waterway	Canal	County	City	50,000-74,999
Waterway	Canal	City	City	25,000-49,999
Waterway	Canal	City	City	10,000-24,999
Waterway	Canal	City	City	5,000-9,999
Waterway	Canal	City	City	1,000-4,999
Waterway	Canal	City	City	500-999
Waterway	Canal	City	City	100-499
Waterway	Canal	City	City	50-99
Waterway	Canal	City	City	10-49
Waterway	Canal	City	City	5-9
Waterway	Canal	City	City	1-4

When not shown on this map, census tracts are shown on the Census Bureau's official website. The Census Bureau's official website is www.census.gov. The Census Bureau's official website is www.census.gov. The Census Bureau's official website is www.census.gov.



Sheet 1 of 5. FIMET sheets:
 0404, 0405, 0406, 0407, 0408, 0409, 0410, 0411, 0412, 0413, 0414, 0415, 0416, 0417, 0418, 0419, 0420, 0421, 0422, 0423, 0424, 0425, 0426, 0427, 0428, 0429, 0430, 0431, 0432, 0433, 0434, 0435, 0436, 0437, 0438, 0439, 0440, 0441, 0442, 0443, 0444, 0445, 0446, 0447, 0448, 0449, 0450, 0451, 0452, 0453, 0454, 0455, 0456, 0457, 0458, 0459, 0460, 0461, 0462, 0463, 0464, 0465, 0466, 0467, 0468, 0469, 0470, 0471, 0472, 0473, 0474, 0475, 0476, 0477, 0478, 0479, 0480, 0481, 0482, 0483, 0484, 0485, 0486, 0487, 0488, 0489, 0490, 0491, 0492, 0493, 0494, 0495, 0496, 0497, 0498, 0499, 0500.





LEGEND

Symbol/Color	Description
Black outline	County Boundary
Black outline	Census Tract Boundary
Blue outline	Water
Green outline	Forest
Yellow outline	Open Space
Orange outline	Low Density Residential
Pink/Purple outline	High Density Residential
Light Blue outline	Water
Light Green outline	Forest
Light Yellow outline	Open Space
Light Orange outline	Low Density Residential
Light Pink/Purple outline	High Density Residential
Black outline	Major Road
Black outline	Minor Road
Black outline	Railroad
Black outline	Airport
Black outline	Water Tower
Black outline	Public Building
Black outline	Religious Building
Black outline	Government Building
Black outline	Other Building
Black outline	Other Structure
Black outline	Other Feature

Notes:

- When two colors are shown on the map, they represent different categories of the same feature.
- Colors are used to distinguish between different categories of the same feature.
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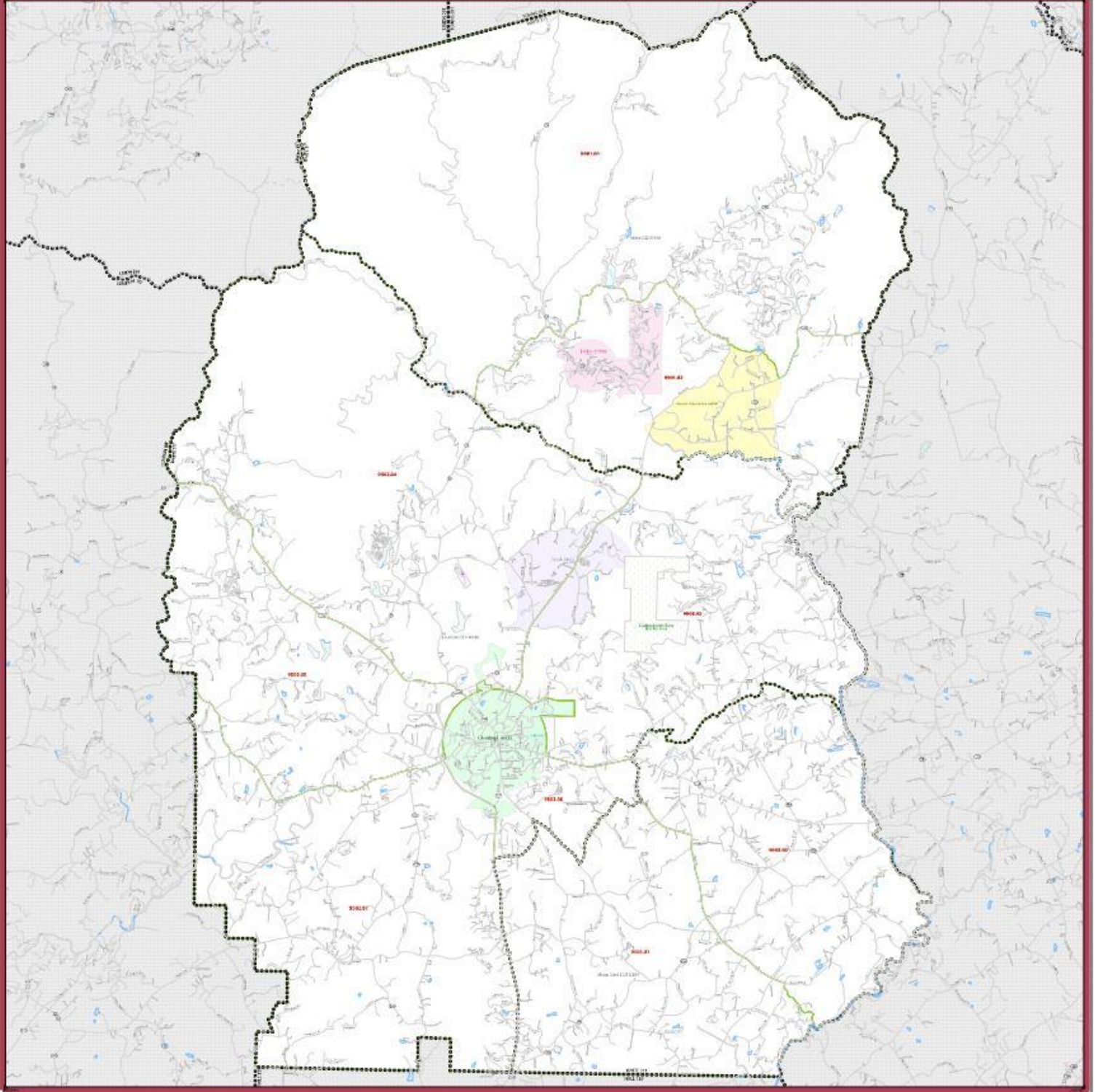


All boundaries and names are as of January 1, 2020. The boundaries and names shown on this map are based on the most current data available to the Census Bureau. The Census Bureau is not responsible for any errors or omissions on this map. For more information, visit <https://www.census.gov>.

Map data provided by Esri, DeLorme, Garmin, and other sources. © 2020 Esri, DeLorme, Garmin, and other sources.

Sheet 1 of 5 PARTIAL sheets
Total Sheets: 5 Sheets (1 Partial), 5 Sheets
NAME: Hall County/2020
DATE: 2020 Census (2020) (2020) (2020)
Version: 1.0





LEGEND	
Water Features	Other
<ul style="list-style-type: none"> Major Waterway Minor Waterway Canal Stream Swamp Bay Lake Reservoir Other Water 	<ul style="list-style-type: none"> Interstate State Route County Road Other Road Other
<ul style="list-style-type: none"> Urban Suburban Rural Other 	<ul style="list-style-type: none"> Other

Scale bar: 0 to 10 miles

North arrow

Source: U.S. Census Bureau, 2020 Census

Map Date: 2020

Map Title: 2020 Census - Census Tract Reference Map: White County, GA

Sheet 1 of 1: PARENT sheet

Total Sheets: 2 (Sheet 1, Sheet 2)

White County, GA

2020 Census