



**Community
Reinvestment
Act
Public File**

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Pinnacle Bank has decided to store the Community Reinvestment Act (CRA) Public File in an electronic format located on the Bank's Intranet site. The address is <http://thepeak.pinnaclebank.com/CRA/Forms/AllItems.aspx>. The CRA Public File is available for anyone who asks to see it at any location. A paper copy can be provided upon request.

Content requirements:

- Written comments (current year and prior two calendar years)
 - received from the public that specifically relate to bank's CRA performance
 - any response to the comments by the bank
 - CRA performance evaluation within 30 business days of receipt
 - Branch information
 - list of branches with their street addresses and geographies
 - list of branches opened or closed during current year and prior two calendar years, their street addresses and geographies
 - list of services generally offered and any material differences in availability or cost of services at particular branches
 - (optional) information regarding availability of alternative systems for delivering retail banking services
 - Map of each AA
 - showing boundaries of the area
 - identifying the geographies contained within the area (either on the map or in a separate list)
 - Any other information the bank chooses to provide
 - If applicable
 - a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) Web site at www.consumerfinance.gov/hmda.
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- The above information must be maintained in Pinnacle Bank's public file and must be updated annually by April 1 of each year.
 - This file is available for inspection by the public upon request and at no cost.
 - The bank must provide copies to any member of the public, in paper or any other acceptable form, upon request. A reasonable fee can be charged to cover the cost of copying and mailing.

LOCATIONS AND GEOCODING

Geocoding is the process of transforming a description of a location to a location on the earth's surface. The Federal Financial Institutions Examination Council (FFIEC) Geocoding/Mapping System was used to determine the Metropolitan Statistical Area/Metropolitan Division (MSA/MD), State, County, Census Tract combination for each branch location.

LOCATION	MSA/MD	STATE	COUNTY	TRACT	TRACT INCOME LEVEL	UNDERSERVED OR DISTRESSED	# ITMs
ASSESSMENT AREA 1							
BLAIRSVILLE OFFICE 361 Blue Ridge Street, Blairsville, GA 30512	NA	13	291	.0002.07	Upper	No	2
BOWMAN OFFICE 27 N. Broad Street, Bowman, GA 30624	NA	13	105	0001.00	Middle	Yes	1
CLARKESVILLE OFFICE 111 Southern Bank Drive, Clarkesville, GA 30523	NA	13	137	0003.00	Upper	No	2
COMMERCE 1981 North Elm Street, Commerce, GA 30529	NA	13	157	0104.00	Middle	No	2
CORNELIA OFFICE 218 Carpenters Cove Lane, Cornelia, GA 30531	NA	13	137	.0005.02	Upper	No	1
DAHLONEGA OFFICE 81 Crown Mountain Place, Suite A100, Dahlonega, GA	NA	13	187	9602.04	Middle	No	0
ELBERTON MAIN OFFICE 884 Ebert Street, Elberton, GA 30635	NA	13	105	0005.01	Middle	Yes	4
ELBERTON TOWNE OFFICE 32 College Avenue, Elberton, GA 30635	NA	13	105	0004.00	Middle	Yes	3
FRANKLIN SPRINGS OFFICE 25 Westclock Circle, Franklin Springs, GA 30639	NA	13	119	8904.01	Middle	No	1
HARTWELL OFFICE 135 East Franklin Street, Hartwell, GA 30643	NA	13	147	9605.03	Upper	No	3
LAVONIA OFFICE 12321 Augusta Road, Lavonia, GA 30553	NA	13	119	8901.01	Middle	No	2
ROYSTON OFFICE 861 Church Street, Royston, GA 30662	NA	13	119	8904.20	Middle	No	3
ASSESSMENT AREA 2							
E. ATHENS OFFICE 3140 Lexington Road, Athens, GA 30605	12020	13	59	1506.00	Moderate	No	2
W. ATHENS OFFICE 1081 Parkway Place, Athens, GA 30606	12020	13	219	0302.02	Upper	No	2
LEXINGTON OFFICE 114 Gilmer Street, Lexington, GA 30648	12020	13	221	9602.06	Moderate	No	1
ASSESSMENT AREA 3							
BRASELTON OFFICE 6322 Grand Hickory Drive, Braselton, GA 30517	12060	13	135	.0506.17	Upper	No	2
COVINGTON OFFICE 6124 Highway 278 NE, Covington, GA 30014	12060	13	217	1003.02	Moderate	No	2
MONROE BROAD ST OFFICE 238 South Broad Street, Monroe, GA 30655	12060	13	297	1107.01	Moderate	No	2
SOCIAL CIRCLE OFFICE 112 North Cherokee Road, Social Circle, GA 30025	12060	13	297	1108.01	Middle	No	2
MONROE SPRING ST OFFICE 1901 West Spring St, Monroe, GA 30655	12060	13	297	1107.01	Moderate	No	1
ASSESSMENT AREA 4							
GAINESVILLE GATEWAY OFFICE 340 Jesse Jewell Parkway, Gainesville, GA 30501	23580	13	139	0008.00	Moderate	No	1
GAINESVILLE DAWSONVILLE HIGHWAY OFFICE 545 Dawsonville Highway, Gainesville, GA 30501	23580	13	139	0010.08	Low	No	1
GAINESVILLE NEW HOLLAND OFFICE 1948 Jesse Jewell Parkway SE, Gainesville, GA 30501	23580	13	139	0006.02	Middle	No	1
ASSESSMENT AREA 5							
MARTINEZ FURYS FERRY OFFICE 375 Furrys Ferry Rd., Martinez, GA 30907	12260	13	073	0301.08	Upper	No	1
GROVETOWN OFFICE 420 Lewiston Rd., Grovetown, GA 30813	12260	13	073	0303.12	Upper	No	1

CRA ASSESSMENT AREAS

For purposes of Community Reinvestment Act reporting, Pinnacle Bank defines its assessment areas as follows:

Assessment Area 1 – A non-MSA consisting of Banks, Elbert, Franklin, Habersham, Hart, Jackson, Lumpkin, Stephens, and Union counties. An area comprising twelve branches of our twenty-five-branch network. Banks and Stephens have been included based upon the Bank's lending activities in these geographies.

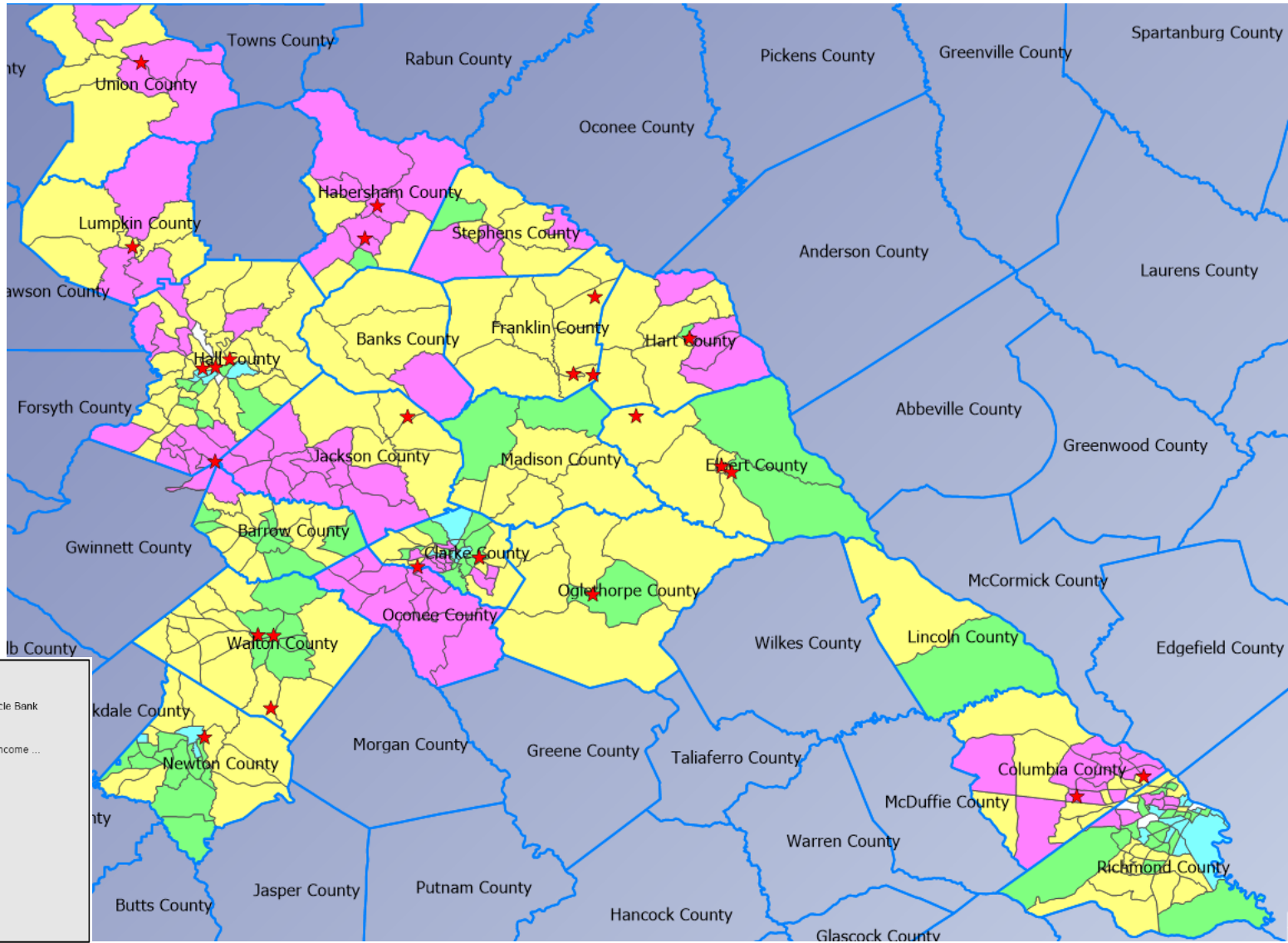
Assessment Area 2 – Athens-Clarke MSA #12020. This assessment area is comprised of all four of the counties in this MSA (Athens-Clarke, Madison, Oconee, and Oglethorpe). Three of Pinnacle's branches are in Athens-Clarke, Oconee, and Oglethorpe Counties. Madison has been included based upon the Bank's lending activities in these geographies.

Assessment Area 3 – The Atlanta MSA #12060, is comprised of three complete counties (Barrow, Newton, and Walton) along with two census tracts from Gwinnett due to the location of our only branch in the northeast corner of the county. Five Pinnacle branches are in this assessment area. The following counties in the Atlanta MSA have been excluded from the Bank's Assessment Area #3: Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, Dekalb, Douglas, Fayette, Forsyth, Fulton, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Paulding, Pickens, Pike, Rockdale, and Spalding.

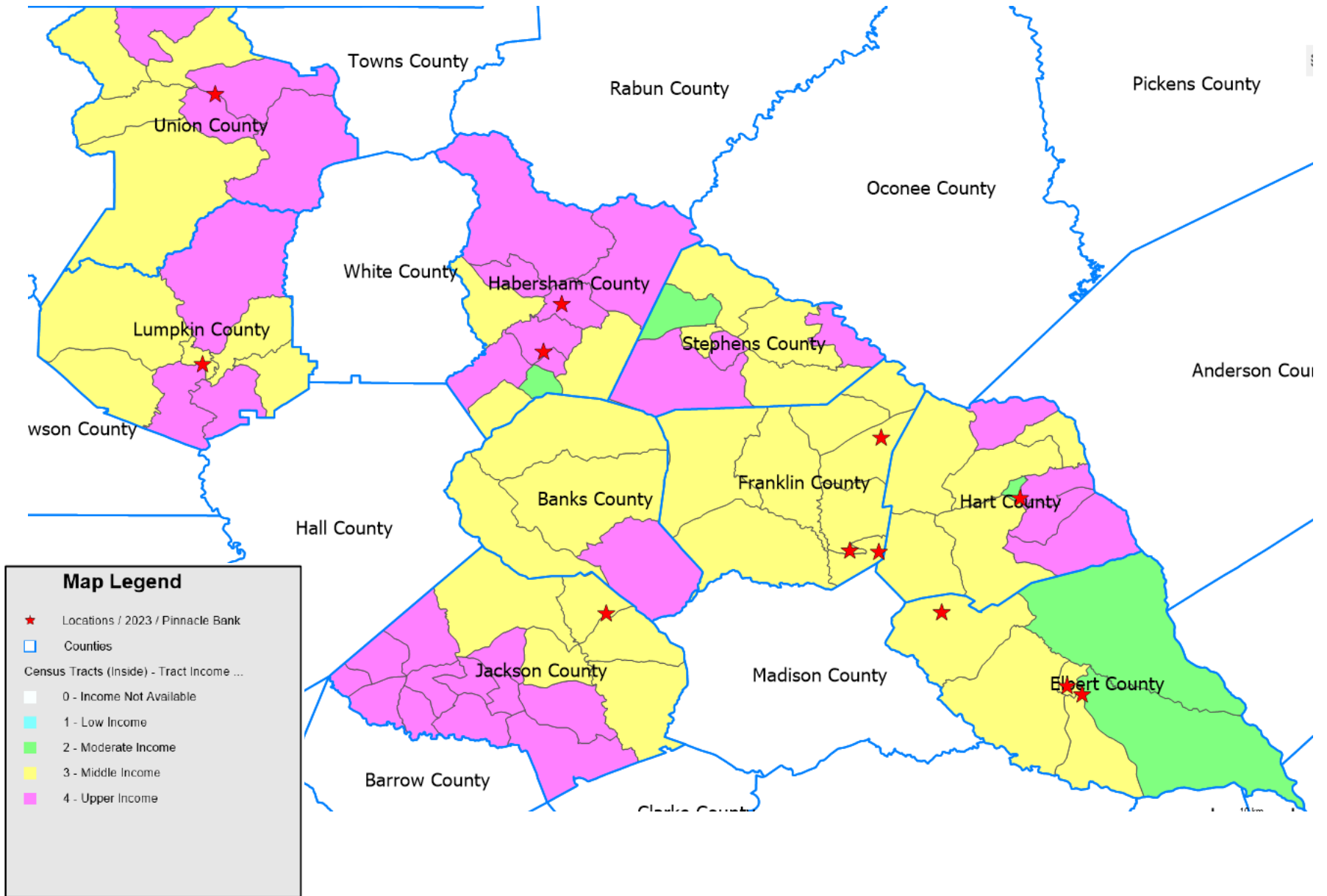
Assessment Area 4 – The Gainesville MSA #23580 is comprised of Hall County, the only county located in the MSA. Three of Pinnacle's branches are located in this assessment area.

Assessment Area 5 – The Augusta-Richmond, GA-SC MSA #12260, is comprised of three complete counties, Columbia, Lincoln, and Richmond. Two of Pinnacle's branches are located in Columbia County. The following counties have been excluded from the Bank's Assessment Area #5: Burke and McDuffie counties located in Georgia and Aiken and Edgefield counties located in South Carolina.

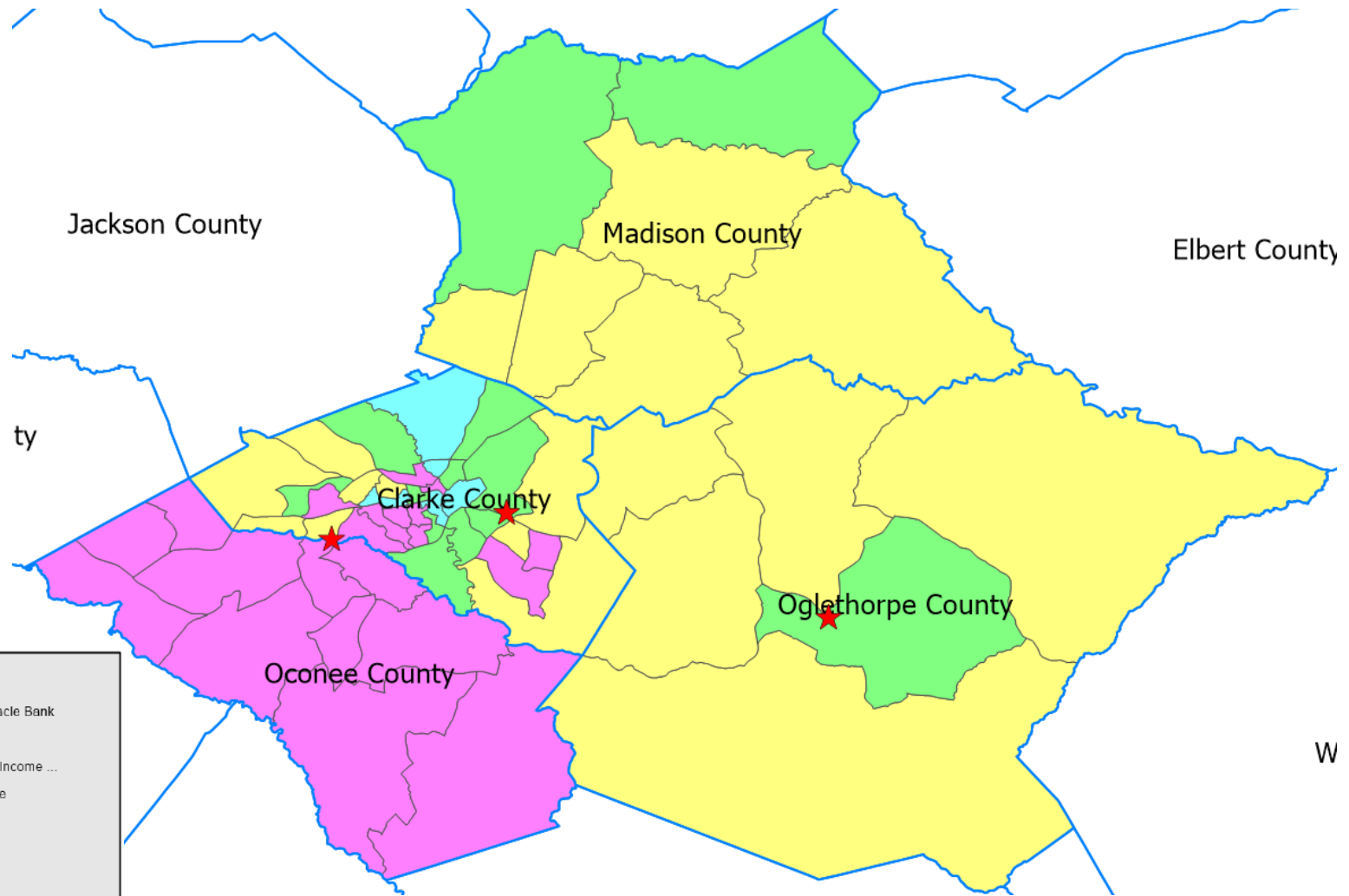
CRA ASSESSMENT AREAS MAP



ASSESSMENT AREA #1 MAP



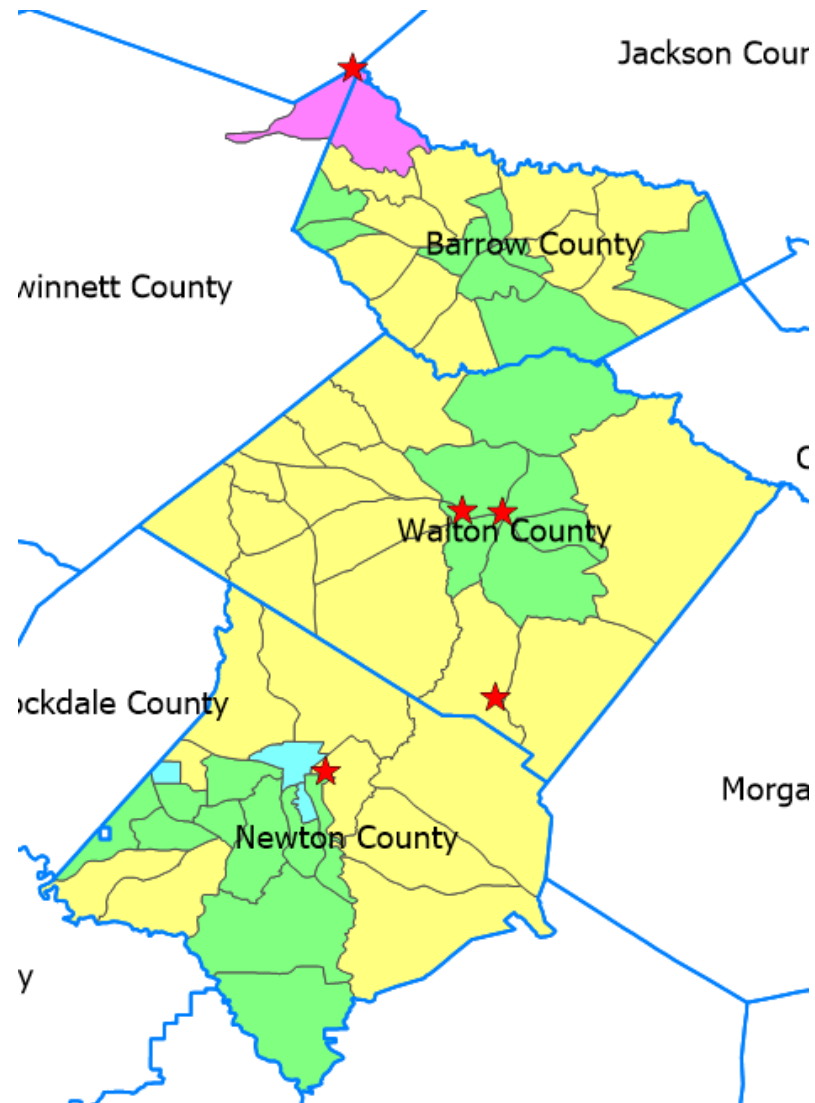
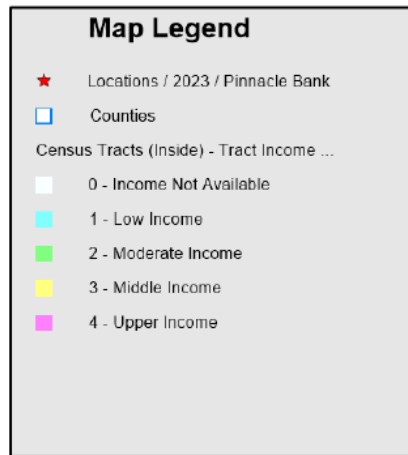
ASSESSMENT AREA #2 MAP



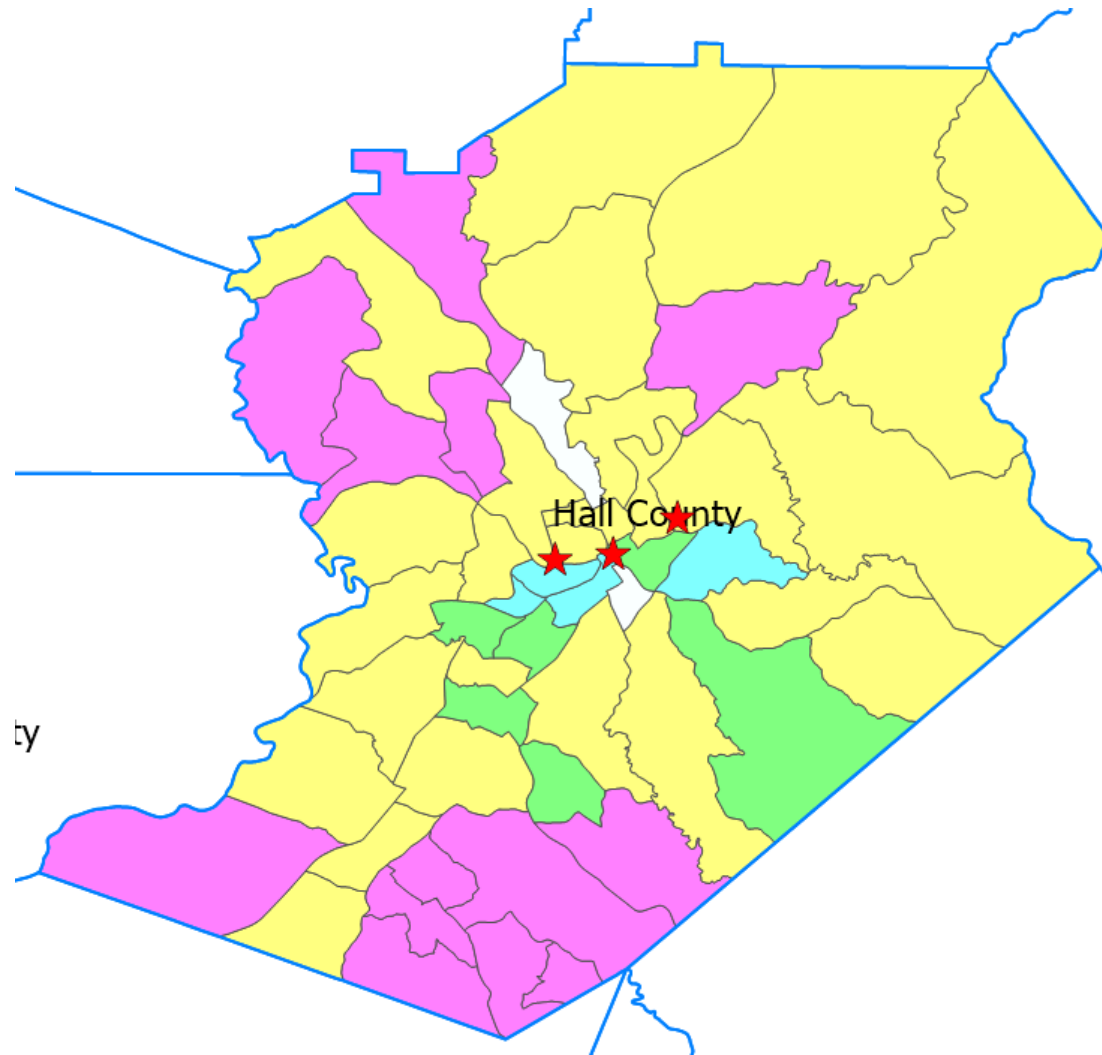
Map Legend

- ★ Locations / 2023 / Pinnacle Bank
- Counties
- Census Tracts (Inside) - Tract Income ...
- 0 - Income Not Available
- 1 - Low Income
- 2 - Moderate Income
- 3 - Middle Income
- 4 - Upper Income

ASSESSMENT AREA #3 MAP



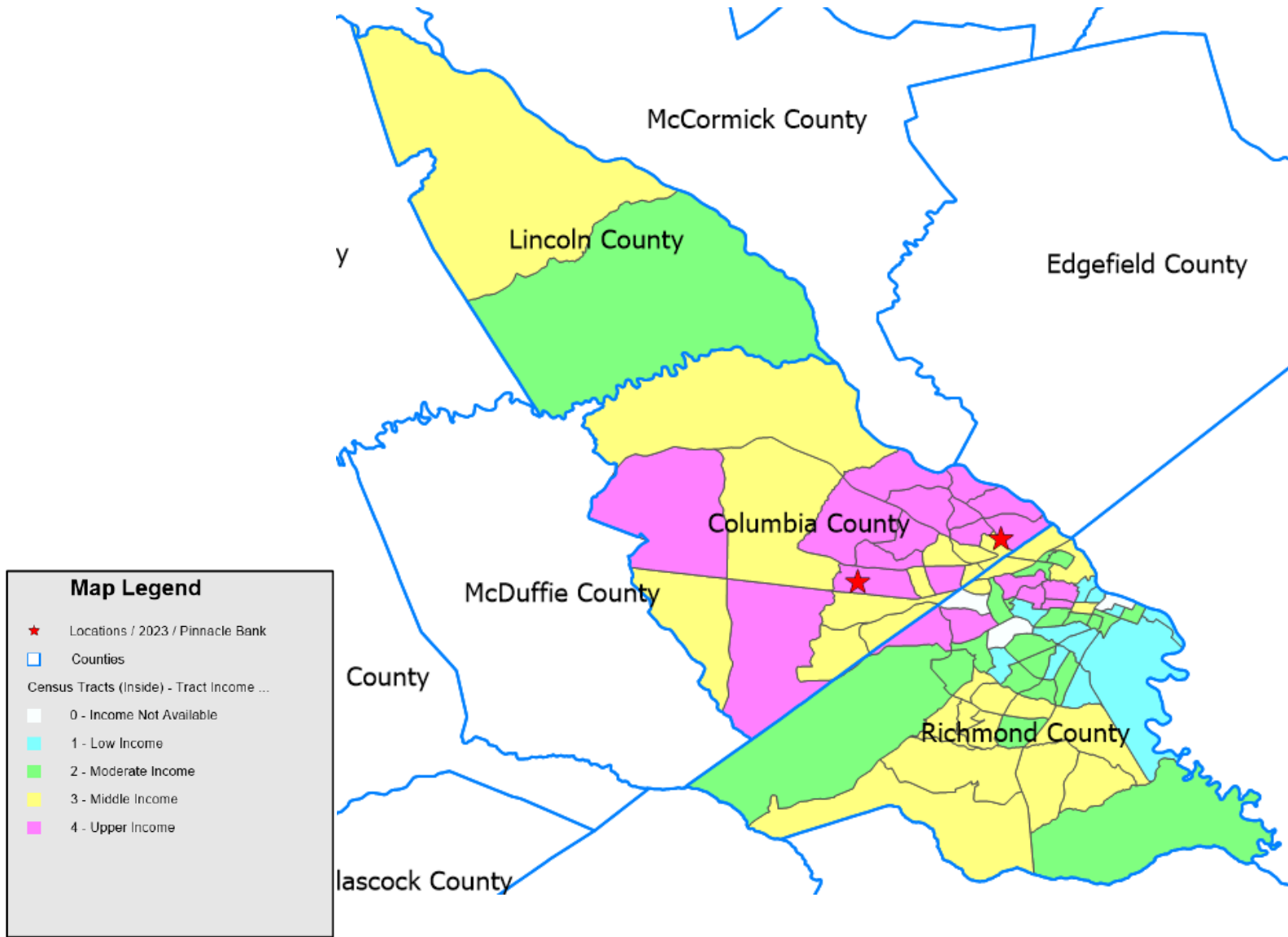
ASSESSMENT AREA #4 MAP



Map Legend

- ★ Locations / 2023 / Pinnacle Bank
- Counties
- Census Tracts (Inside) - Tract Income ...
- 0 - Income Not Available
- 1 - Low Income
- 2 - Moderate Income
- 3 - Middle Income
- 4 - Upper Income

ASSESSMENT AREA #5 MAP



ASSESSMENT AREA #1 CENSUS TRACTS

Banks	Elbert	Franklin	Habersham	Hart	Jackson	Lumpkin	Stephens	Union
9701.00	0001.00	8901.01	0001.00	9601.01	0101.04	9601.03	9701.01	0001.01
9702.00	0002.00	8901.03	0002.01	9601.02	0101.05	9601.04	9701.02	0001.03
9703.00	0003.00	8901.04	0002.03	9601.03	0101.06	9601.05	9702.01	0001.04
9704.00	0004.00	8902.01	0002.04	9602.00	0101.07	9601.06	9702.02	0002.01
	0005.01	8902.02	0003.00	9603.00	0101.08	9602.03	9703.01	0002.03
	0005.02	8903.00	0004.00	9604.01	0101.09	9602.04	9703.02	0002.04
		8904.01	0005.01	9604.02	0102.00	9602.05	9704.01	0002.06
		8904.02	0005.02	9605.01	0103.00	9602.06	9704.02	0002.07
			0006.01	9605.02	0104.00			
			0006.03	9605.03	0105.00			
			0006.04		0106.01			
					0106.02			
					0107.01			
					0107.03			
					0107.04			
					0107.05			
					0107.06			

ASSESSMENT AREA #2 CENSUS TRACTS

Clarke	Madison	Oconee	Oglethorpe
0001.00	0201.00	0301.01	9601.00
0004.01	0202.00	0301.02	9602.03
0004.02	0203.00	0301.03	9602.04
0006.00	0204.00	0301.04	9602.05
0009.00	0205.01	0302.01	9602.06
0012.00	0205.02	0302.02	9603.00
0017.00	0206.00	0303.00	
0018.00		0304.01	
0019.00		0304.02	
0020.00		0305.00	
0021.00		0306.00	
0022.00			
0301.01			
0301.02			
0302.00			
1303.00			
1304.00			
1305.00			
1306.01			
1306.02			
1307.01			
1307.02			
1403.00			
1404.00			
1405.00			
1406.00			
1503.00			
1504.00			
1505.00			
1506.00			
1507.01			
1507.02			
1508.00			
1509.00			

ASSESSMENT AREA #3 CENSUS TRACTS

Barrow	Gwinnett	Newton	Walton
1801.03	0506.17	1001.00	1101.01
1801.04		1002.01	1101.02
1801.05		1002.02	1102.00
1801.06		1002.03	1103.01
1801.07		1002.04	1103.02
1801.08		1003.01	1104.00
1802.03		1003.02	1105.03
1802.04		1004.00	1105.04
1802.05		1005.03	1105.05
1802.06		1005.04	1105.06
1803.01		1005.05	1105.08
1803.02		1005.06	1105.09
1803.03		1005.07	1105.10
1804.01		1006.00	1106.01
1804.02		1007.01	1106.02
1805.01		1007.02	1106.03
1805.02		1008.01	1107.01
1805.03		1008.02	1107.02
		1009.02	1108.01
		1009.03	1108.02
		1009.04	
		1009.05	

ASSESSMENT AREA #4 CENSUS TRACTS

Hall

0001.01	0010.06
0001.02	0010.07
0002.03	0010.08
0002.04	0011.01
0002.05	0011.02
0002.06	0012.02
0003.03	0012.03
0003.04	0012.04
0003.05	0013.02
0003.06	0013.03
0003.07	0013.04
0004.01	0014.02
0004.02	0014.04
0005.01	0014.05
0005.02	0014.06
0006.01	0015.01
0006.02	0015.02
0007.02	0016.03
0007.03	0016.05
0007.04	0016.06
0008.00	0016.07
0009.01	0016.09
0009.02	0016.10
0010.04	0016.11
0010.05	0016.12

ASSESSMENT AREA #5 CENSUS TRACTS

Columbia	Lincoln	Richmond		
0301.03	9701.00	0001.00	0102.03	0107.07
0301.05	9702.00	0002.00	0102.05	0107.08
0301.06		0003.00	0102.06	0107.09
0301.07		0006.00	0102.07	0107.10
0301.08		0007.00	0102.08	0107.11
0302.01		0010.00	0103.00	0107.13
0302.02		0011.00	0104.00	0107.14
0302.03		0012.00	0105.06	0108.01
0303.04		0013.00	0105.07	0108.02
0303.06		0014.00	0105.08	0109.03
0303.07		0016.02	0105.09	0109.04
0303.08		0016.03	0105.10	0109.05
0303.10		0016.04	0105.11	0109.06
0303.11		0101.01	0105.12	0109.07
0303.12		0101.04	0105.13	0109.08
0303.13		0101.05	0105.14	0110.00
0304.01		0101.07	0105.15	0111.00
0304.03		0101.08	0106.01	
0304.04		0101.09	0106.02	
0304.04		0102.01	0107.06	
0305.03				
0305.04				
0305.05				
0305.07				
0305.08				
0306.03				

HOURS OF OPERATION

Lobby Hours: Monday through Friday 9:00 a.m. - 5:00 p.m.

Dahlonega Branch*: Monday through Friday 9:00 a.m. – 5:00 p.m.

*Closed 12:00-1:00 daily.

Interactive Teller Monday through Friday 7:00 a.m. – 7:00 p.m.

Machine Hours: Saturday 8:00 a.m. – 2:00 p.m.

Monroe Spring St. Branch

Drive-thru Hours: Monday through Friday 8:30 a.m. – 5:00 p.m.

ATM 24 Hours**

**At all locations except Dahlonega

BRANCHES OPENED OR CLOSED

LOCATION	ACTION DATE	ACTION TAKEN	CENSUS TRACT	INCOME LEVEL
1871 North Elm Street Commerce, GA 30529	06/28/2021	Closed	NA/13/157/0104.00	Middle
1981 North Elm St. Commerce, GA 30529	06/28/2021	Opened	NA/13/157/0104.00	Middle
311 Green St. Gainesville, GA 30501	07/26/2021	Closed	23580/13/139/0009.00	Middle
340 Jesse Jewell Pkwy. Gainesville, GA 30501	07/26/2021	Opened	23580/13/139/0008.00	Moderate
1901 West Spring St. Monroe, GA 30655	10/01/2021	Opened	12060/13/297/1107.00	Moderate
375 Fury Ferry Rd. Martinez, GA 30907	11/01/2021	Opened	12260/13/073/0301.02	Upper
420 Lewiston Rd., Grovetown, GA 30813	11/14/2022	Opened	12260/13/073/0303.12	Upper

PRODUCTS AND SERVICES OFFERED

Deposit Products

Consumer

Benefits Checking
Totally Free Checking
VIP Free Interest Checking
High Yield Interest Checking
Simple Savings
Captain Summit Savings Account
Christmas Club
Money Market
Money Market IRA
Certificate of Deposit
12 Month Rate Riser
Systematic Saver Account
Certificate of Deposit Account Registry Service
Individual Retirement Accounts
Health Savings Accounts
Simple Money Market
Pinnacle Partner Savings Account
Pinnacle Partner Certificate of Deposit

Commercial

Totally Free Business Checking
Commercial Checking
Business Interest Checking
Simple Savings
Money Market
Certificate of Deposit Account Registry Service
Health Savings Accounts
Certificate of Deposit

Loan Products

Consumer

Auto Loans
Boat Loans
Construction Loans
Home Equity Line of Credit
Home Improvement Loans
Loans Secured by CD or Savings Account
My FasTrack
Mobile Home Loans
Mortgage Loans

Commercial

Revolving Line of Credit
Commercial Line of Credit
Business Construction/Mortgage Loans
Equipment Loans
Letter of Credit
Short Term Inventory Loans
CashFlow LEASE
Small Business Administration Loans
Agriculture Loans

Personal Line of Credit
Personal Loans
Federal Home Loan Bank Products: Community Partners, First-time Homebuyer, Foreclosure Recovery, Veterans Products
United States Department of Agriculture Loans
United States Department of Veterans Affairs Loans
Federal Housing Administration Loans
*Credit Life and Disability Insurance** (not available on a Home Mortgage Loan)
Affordable Mortgage Program
Down Payment Assistance
Jumbo Mortgage Program
Physicians Mortgage Program
All the Way Home
MyFlexFunds (online, non-real estate loans)
Adjustable-Rate Mortgage

Business Manager Asset Based Lending
Georgia State Small Business Credit Lending

Business FasTrack

Business FlexFunds (online, non-real estate loans)

Treasury Management

<i>ACH Origination</i>	<i>Lock Box</i>
<i>Merchant Services for Card Processing</i>	<i>Night Depository Services</i>
<i>Online Cash Management</i>	<i>Payroll Processing</i>
<i>Remote Deposit</i>	<i>Wire Transfer</i>
<i>Sweeps</i>	
<i>Positive Pay</i>	
<i>Commercial Checking</i>	

Account Access

<i>Debit Card</i>	<i>Online Banking</i>
<i>Mobile Banking</i>	<i>Online Banking E-mail Alerts</i>
<i>Online Bill Pay</i>	<i>eStatement</i>
<i>Telephone Banking</i>	<i>Zelle</i>
<i>Text Banking</i>	<i>Online Banking & Mobile App Alerts</i>
<i>Transfer Now</i>	

Other Services

<i>Automatic Funds Transfers</i>	<i>Overdraft/Bounce Guard</i>
<i>Direct Deposit</i>	<i>Wire Transfer</i>
<i>Medallion Signature Guarantee</i>	<i>Notary Service</i>

<i>Official Check Research Time</i>	<i>US Savings Bond Safe Deposit Box</i>
<i>Online Account Opening</i>	<i>1031 Qualified Intermediary Exchanges</i>
<i>Online Mortgage Application</i>	<i>Debit Card Fraud Alert Services</i>
	<i>Saving Cents</i>

24 Hour Access

Pinnacle Bank offers an ATM/Pinnacle Bank MasterCard Debit Card for everyday access to funds at any ATM anywhere in the world.

We also offer 24 hour a day bank by phone service that allows balance inquiries, transfer funds between accounts, and inquiries on processed checks.

Pinnacle Bank offers Online Banking and Bill Pay via the Internet, allowing banking functions from any device with an Internet connection.

Pinnacle Bank offers mobile banking, allowing balance inquiries, transaction viewing, deposits, funds transfer, and Bill Pay.

Pinnacle Bank offers Person-to-Person payment, Zelle, allowing customers to send money to, or request money from, another person.

Pinnacle Bank offers Account-to-Account transfers which allows customers to move funds from accounts held at other banks into their Pinnacle Bank account.

SCHEDULE OF FEES

Account Reconciliation/Research/ATM Research (per hour, 1 hr. min.)	\$25.00
Statement/Image copy	\$2.00/page
Activity Print Out	\$1.00/page
ATM's	
• Cash Withdrawal at Pinnacle ATM	FREE
• Replace Card	\$5.00
Check Reject Fee	\$5.00
Collection Fee (for charged-off checking/savings account)	\$50.00
Collections	\$25.00
International Collection Fee	\$100.00
Copies	\$0.25
Debit Items (Debit Item Fee - excessive withdrawals savings and money market accounts)	\$5.00
Dep Item Ret Chrg (Deposit Item Return Charge)	\$10.00
Dormant Account Fee (per month)	\$5.00
Garnishment	\$50.00
IRA Maintenance & Reporting Fee (annual)	\$10.00
IRA Transfer Fee	\$50.00
Levies	\$75.00
No Mail & Special Statement Delivery Request (charged annually)	\$5.00/month
Notary Service	FREE
Online Banking and Bill Pay	FREE
Official Check	\$10.00
Official Check Stop Payment	\$15.00
Overdraft Fees	
Cont OD Charge (Continuous Overdraft Charge - after 5 consecutive days & each 6th day up to 35 days)	\$25.00
Overdraft Charge (Paid item because a check/ACH presented wasn't covered by funds in the account.)	\$30.00
Overdraft Charge (Bounce Guard paid for items when there weren't enough funds in the account)	\$30.00
Return Item Chrg (Return Item Charge/Failed Transaction per presentment)	\$20.00
Zelle	
• Send Money	FREE
• Stop Payment	\$15.00
External Transfer	
• 3 days	FREE
• Next Day, if qualified	\$9.95

PHON-Xpress (24-hour account information)	FREE
Premature Account Closing (closed within 90 days of opening)	\$15.00
Printed Checks (Paid by customer who selects check style)	Price Varies
Restrained Account (Credits Only) (per month)	\$30.00
Rtn Mail Fee (Returned Mail Fee if Customer Hasn't Updated Contact Information)	\$5.00
Safe Deposit Box Rentals (annual fee)	
• 3x5	\$30.00
• 5x5	\$40.00
• 3x10	\$50.00
• 5x10	\$75.00
• 10x10	\$100.00
• Rent Past Due – 60 days	\$25.00
• Drill Box/ Key Replacement	\$150.00 minimum
Stop Payment	\$15.00
Sweep Transaction Charge	\$10.00
Telephone Transfers	\$2.00
Wire Transfers (domestic)	\$18.00
Wire Transfers (international)	\$55.00
Wire Hdlg Fee (Wire Handling Fee if Wire is Returned for Incorrect Information)	\$10.00

HOME MORTGAGE DISCLOSURE ACT NOTICE

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.

ATTACHMENT A: CRA PERFORMANCE EVALUATION

Maintained as a separate document.