



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 28, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fifth District Savings Bank
Charter Number: 700133

4000 General DeGaulle Drive
New Orleans, LA 70114-8211

Office of the Comptroller of the Currency

3850 N. Causeway Blvd.
Suite 1330
Metairie, LA 70002

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a more than reasonable loan-to-deposit (LTD) ratio. A majority of loans being made in the assessment areas (AA). A reasonable geographic distribution of loans. A reasonable loan distribution to borrower of different income levels.
- The Investment Test rating is based on adequate responsiveness to community development (CD) lending and investments and excellent responsiveness to CD services.

LTD Ratio

Considering Fifth District Savings Bank's (Fifth District) size, financial condition, and credit needs of the AA, the LTD ratio is more than reasonable. The 13 quarters of the evaluation period for the Fifth District resulted in an average LTD ratio of 89.5 percent. This ratio remains relatively unchanged from the previous CRA Performance Evaluation (PE) of 89.4 percent. Over the evaluation period, Fifth District's LTD ratio fluctuated significantly, with a quarterly high of 92.9 percent recorded on September 30, 2023, and a quarterly low of 85 percent recorded on June 30, 2024. By comparison, Fifth District's average LTD exceeded the 78.4 percent average LTD for similarly situated financial institutions located within or near the AA.

Fifth District's LTD ratio comparison to competing institutions operating in the AA is as follows:

Institution	Assets - As of March 31, 2025 (in thousands)	Average LTD
Fifth District Savings Bank	\$530,778	89.47%
American Bank	\$327,183	78.83%
Bank of Louisiana	\$99,041	58.72%
Citizens Bank & Trust Company	\$186,757	82.71%
Crescent Bank	\$1,058,467	90.42%
Metairie Bank & Trust Company	\$625,504	83.23%

Lending in AA

A majority of the bank's loans were inside its AA. The bank originated and purchased 77.3 percent by number and 78.4 percent by dollar amount of its total loans inside the bank's AAs during the evaluation period. This analysis was performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the AA									2022 - 2024	
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	211	77.29	62	22.71	273	78,627	78.36	21,720	21.64	100,347
Total	211	77.29	62	22.71	273	78,627	78.36	21,720	21.64	100,347

Source: 1/1/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Fifth District is a full-service community thrift headquartered in New Orleans, LA. Fifth District operates with seven branches in its AA, including its main office and one branch located in Orleans Parish. There are an additional four branches located in Jefferson Parish and another in St. Tammany Parish. Fifth District's main office is located in a moderate-income census tract (CT), while the others are located in a low-income CT (one), middle-income CT (four), and upper income CT (one). Since the previous PE, Fifth District converted from a mutual thrift to a stock-owned thrift. The conversion has brought an influx of cash that has allowed Fifth District to expand the products and services it offers. As of December 31, 2024, total assets were \$527 million, with total loans and leases of \$367 million. Total deposits were \$419 million, and tier one capital was 43.2 percent.

Fifth District primarily originates one- to four-family residential mortgages for its own portfolio, which are funded by depositors. Fifth District offers home purchase, construction/permanent, vacant lot, home improvement, refinance, HELOC, commercial, and share loans. Fifth District has not made changes to its corporate structure, including any merger or acquisition activities, since the previous PE. As illustrated in the table below, Fifth District focuses primarily on residential real estate lending. As of December 31, 2024, the loan portfolio consisted of the following:

Fifth District Savings Bank Loan Portfolio		
Loan Category	Dollars (000)	Percentage
Home Mortgage	341,352	92.51
Construction and Land Development	9,588	2.60
Non-Farm and non-Residential	594	0.16
Other (Commercial & Industrial /Consumer)	17,460	4.73
Total	368,994	100

*Bank data and Call Report

Banking hours reasonably meet the community needs with lobby hours consistent at all locations. Fifth District has operating hours of 9:00 a.m. to 4:00 p.m. Monday through Thursday and 9:00 a.m. to 5:00 p.m. on Fridays. Of the seven branches, four are open on Saturday for drive-up service, including the main office. Fifth District has seven ATMs, all of which accept deposits. Customers can also access their accounts through online banking/mobile banking with mobile deposit and bill payment. All branches can originate loans and receive mortgage loan applications. There are no significant differences between products offered at the various branches.

Fifth District has implemented several new products and services. In 2022, Fifth District modernized the customer's online banking experience with its implementation of FDSB Connected. FDSB Connected provides customers with added security and the ability to communicate with the Electronic Banking Department through a chat feature. FDSB Connected also improves the mobile banking experience by making all services accessible through web-based online banking available on mobile devices. In 2023,

Fifth District enhanced its business banking offerings by adapting its current business checking account product to allow customers to access online banking, bill payment, mobile deposit, and eStatements. In 2024, Fifth District implemented real-time payments allowing customers to receive instantaneous transfers into their deposit accounts and expanded its loan product offerings to include FHA and VA loans and commercial loans.

Management has designated portions of the New Orleans – Metairie and Slidell - Covington Metropolitan Statistical Areas (MSAs) as its AA. Fifth District has defined its AA as portions of Orleans, Jefferson, and St. Tammany Parishes, which are located on the Southshore and Northshore of New Orleans. The Northshore and Southshore of New Orleans refers to the areas north and south of Lake Pontchartrain. The Southshore encompasses Orleans Parish and Jefferson Parish and includes the cities New Orleans and Metairie. The Northshore encompasses primarily St. Tammany Parish and include the cities of Slidell and Covington. According to 2024 census data, the MSA encompasses a total of 187 CTs. Of those, 11 are designated as low income CTs, 48 as moderate-income CTs, 64 as middle-income CTs, and 64 as upper-income CTs. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income CTs.

Fifth District faces significant competition in originating loans and attracting deposits in its AA. This competition stems from other banks, credit unions, and mortgage banking companies with regional and national footprints. Many of the financial service providers operating in Fifth District's AAs are significantly larger, such as JP Morgan Chase Bank, Capital One Bank, and Hancock Whitney Bank and have greater financial resources.

Fifth District has no affiliate or operating subsidiary activities considered when evaluating CRA performance. There were no legal or financial factors impeding Fifth District's ability to meet the credit needs in the AA during the evaluation period. Fifth District's CRA performance was rated "Outstanding" in the previous PE dated August 1, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the CRA performance of Fifth District using the Interagency Intermediate-Small Bank CRA procedures, which focus on an analysis of the primary loan products as well as CD activities. The evaluation period covered January 1, 2022, through December 31, 2024. Conclusions regarding Fifth District's lending performance are based on a review of residential real estate loans. These loans represent all loans reported on the HMDA loan application register for 2022, 2023, and 2024. CD activities include qualifying loans, investments, and services covering the same review period. Due to changes in AA demographics during the review period, we combined and analyzed 2022 and 2023 data separately from 2024 data.

Selection of Areas for Full-Scope Review

In each state where Fifth District has an office, one or more of AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Fifth District operates in one state, Louisiana, and has traditionally only operated in one AA, the New Orleans MSA AA. In 2024 however, St. Tammany Parish, which had historically been included in the New Orleans MSA, was removed and added to the Slidell MSA, thus creating an additional AA for Fifth District.

A review of bank activity revealed Fifth District only originated six mortgage loans in the Slidell MSA and had few, if any CD activities in that same AA in 2024. As such, activities in the Slidell MSA were not analyzed during this PE, and the New Orleans MSA AA received a full-scope review.

Ratings

For purposes of this evaluation, Fifth District operates in one AA, the New Orleans MSA AA, located in the state of Louisiana, which received a full-scope review.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Louisiana

CRA rating for the state of Louisiana: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of loans in the state.
- A reasonable distribution of loans to individuals of different income levels given the demographics in the AA.
- An adequate level of CD lending and investments.
- An excellent level of CD services.

Description of Institution's Operations in Louisiana

Fifth District serves its community in the state of Louisiana through seven branches located in two AAs. Of those seven branches, six are located in the New Orleans-Metairie MSA and one is located in the Slidell-Mandeville-Covington MSA. The six branches in the New Orleans MSA are located in Orleans Parish and Jefferson Parish and the branch located in the Slidell MSA is located in St. Tammany Parish. Prior to 2024, St. Tammany Parish was part of the New Orleans MSA, but in 2024 it was transferred to the Slidell MSA. Fifth District has selected as its AA portions of Orleans, Jefferson, and Plaquemines Parishes in the New Orleans MSA and portions of St. Tammany Parish in the Slidell MSA.

For this evaluation the New Orleans MSA AA received a full scope review. Fifth District primarily offers residential real estate loans.

New Orleans MSA AA

Fifth District operates with six branches in the New Orleans MSA AA. The MSA is in the southeast portion of the state and consists of eight parishes. Since Fifth District determined the entire MSA was too large to adequately provide services, it has chosen three of those eight parishes to serve including parts of Orleans, Jefferson, and Plaquemines. Parts of those parishes include those CTs on the "Westbank" of the Mississippi River and the "Eastbank" of the Mississippi River consisting of parts of Orleans and Jefferson Parish north of Interstate 10 and Interstate 610 and west of Elysian Fields Ave.

Of the bank's six branches, two are in Orleans Parish and four are in Jefferson Parish. The city of New Orleans is in Orleans Parish and is the economic center of the MSA. Orleans Parish is 350 square miles, of which 169 square miles is land and 181 square miles is water. Jefferson Parish is adjacent to Orleans Parish and includes the cities of Metairie, Marrero, and Westwego.

There is a total of 193 CTs in the AA, with 6.2 percent of those CTs low-income CTs, 25.4 percent moderate-income CTs, 33.2 percent middle-income CTs, and 35.2 percent upper-income CTs. The AA meets regulatory requirements and does not arbitrarily exclude any low- or moderate-income areas.

Fifth District's competition is significant with the bank competing with several large and regional banks, credit unions, and mortgage banking companies with footprints across the AA. Based on the FDIC's 2023 Deposit Market Share Report, FDSB ranked 14 out of 32 institutions in its AA, holding 0.9 percent market share. The largest five competitor include Capital One (29.0), Hancock Whitney (19.4), JP Morgan Chase (17.9), Regions Bank (7.5), and First Horizon Bank (4.7) and commanded approximately 79 percent of the deposit market, evidencing significant competition in the AA.

HMDA aggregate data for 2023 revealed that Fifth District ranked 42 out of 344 financial institutions making loans in the AA. There was a total of 10,646 loans originated in the AA, of which Fifth District achieved a market share of 0.53 percent. The top five lenders in the AA achieved a combined market share of 26.0 percent, evidencing significant competition in the AA for mortgage loans.

The Federal Financial Institutions Examination Council's (FFIEC) updated 2023 median family income for the AA was \$82,300. Low income is defined as less than 50 percent of the median family income. Moderate income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

Income Categories – New Orleans MSA AA			
Low	Moderate	Middle	Upper
< \$41,150	\$41,151 to < \$65,840	\$65,841 to < \$98,760	≥ \$98,760

Source: US Census data

The HUD adjusted MSA median family income for the assessment area in 2023 was \$82,300. Using Fifth District's current underwriting ratios, a low-income borrower would qualify for a maximum loan amount of approximately \$178,600 while a moderate-income borrower would qualify for loans between \$178,600 and up to \$302,000 within the New Orleans MSA AA. Low supply of housing coupled with increased demand caused housing prices to increase significantly during most of the review period. While census data reports the average home price in the AA to be \$195,800, the average listing price in the AA during the review period was significantly higher. The New Orleans Real Estate Market Analysis concluded that the average price of a single-family home in the New Orleans metropolitan area rose from \$343,432 to \$359,795 (4.8 percent) between 2021 and 2024. Based on this information, both low- and moderate-income borrowers would potentially not be able to purchase a home, even assuming the borrower had no additional debt and before factoring in reasonable taxes and insurance, which would be an additional challenge to home ownership for most low- and moderate-income borrowers as taxes and home insurance costs have increased significantly during the review period in the AA.

Low-income families earning a median family income less than \$41,150 represented 22.3 percent of families in the AA, while moderate-income families comprised 14.9 percent of the AA population. In 2023, 10.8 percent of families in the AA earned wages below the poverty level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the 11 low-income and 49 moderate-income CTs in the AA. Of the 290,474 housing units within the AA, only 5.6 percent are in the low-income CTs and 25.8 percent are in the moderate-income CTs. These percentages

are reduced further when just focusing on owner-occupied housing units, with there being only 3.5 percent in low-income CTs and 17.8 percent in moderate-income CTs.

The following table depicts the demographic information for the full-scope AA in Louisiana.

Assessment Area(s) - New Orleans MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	193	6.22	25.39	33.16	35.23	0.00
Population by Geography	692,329	5.32	23.96	34.22	36.50	0.00
Housing Units by Geography	290,474	5.63	25.79	34.57	34.00	0.00
Owner-Occupied Housing by Geography	170,389	3.53	17.77	36.43	42.27	0.00
Occupied Rental Units by Geography	91,580	8.88	39.88	31.86	19.38	0.00
Vacant Units by Geography	28,505	7.71	28.51	32.18	31.59	0.00
Businesses by Geography	44,419	3.40	21.11	36.36	39.13	0.00
Farms by Geography	1,028	2.82	18.39	43.00	35.80	0.00
Family Distribution by Income Level	163,015	22.30	14.89	18.87	43.94	0.00
Household Distribution by Income Level	261,969	23.92	13.93	16.62	45.54	0.00
Unemployment rate (%)	5.28	8.26	7.51	5.01	3.74	0.00
Households Below Poverty Level (%)	13.63	28.81	22.73	10.94	7.21	0.00
Median Family Income (35380 - New Orleans-Metairie, LA MSA)		\$72,053	Median Housing Value			\$195,800
Median Family Income (35380 - New Orleans-Metairie, LA MSA) for 2023		\$82,300	Median Gross Rent			\$1,022
			Families Below Poverty Level			10.76
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The AA's economy is dominated by tourism and the finance/insurance/real estate sector, which account for 68 percent of jobs in the AA. According to the Bureau of Labor Statistics, as of December 31, 2023, the unemployment rate of the MSA was 4.3 percent, which was slightly higher than the Louisiana state average of 3.8 percent and the U. S. national average of 3.7 percent.

In conjunction with this PE, we conducted a listening session with several community leaders in the AA. The primary credit needs in the community were identified as affordable housing, access to capital, business education, and small dollar lending. According to these contacts, local banks have been active in helping meet the credit needs of the AA.

Scope of Evaluation in Louisiana

As previously discussed, the Fifth District has one AA, which received a full-scope review. Consistent with Fifth District's primary lending focus, residential real estate loans were analyzed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

Fifth District's performance under the Lending Test in Louisiana is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, Fifth District's lending performance in the state of Louisiana was reasonable.

Distribution of Loans by Income Level of the Geography

Fifth District exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of Fifth District's home mortgage loan originations and purchases.

2022/2023

Fifth District exhibited a reasonable geographic distribution of loans in the New Orleans MSA AA when considering demographic and market conditions. While the percentage of loans in both the low- and moderate-income CTs was less than the comparator and aggregate lending, Fifth District's lending was reasonable when considering the HMDA market share in the AA and the lack of owner-occupied housing, particularly in the low-income CTs, where only 3.5 percent of the owner-occupied housing units are located.

2024

Fifth District exhibited a reasonable geographic distribution of loans in the New Orleans MSA AA when considering demographic and market conditions. While the percentage of loans in both the low- and moderate-income CTs was less than the comparator and aggregate lending, Fifth District's lending was reasonable when considering the HMDA market share in the AA and the lack of owner-occupied housing, particularly in the low-income CTs, where only 3.5 percent of the owner-occupied housing units are located.

Lending Gap Analysis

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, demographic information, and bank capacity and restraints during the evaluation period. No unexplained conspicuous gaps were identified. This had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

Fifth District exhibited a reasonable distribution of loans to individuals of different income levels, given the product lines offered.

Home Mortgage Loans

Refer to Table 8 in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of Fifth District's home mortgage loan originations and purchases.

2022/2023

Fifth District exhibited a reasonable distribution of loans among low- and moderate-income borrowers in the New Orleans MSA AA when considering demographic and market conditions. While the percentage of loans in both the low- and moderate-income CTs was less than the comparator and aggregate lending, Fifth District's lending was reasonable when considering the HMDA market share in the AA and the lack of both available and affordable housing in those CTs.

2024

Fifth District exhibited a reasonable distribution of loans among low- and moderate-income borrowers in the New Orleans MSA AA when considering demographic and market conditions. While the percentage of loans in both the low- and moderate-income CTs was less than the comparator and aggregate lending, Fifth District's lending was reasonable when considering the HMDA market share in the AA and the lack of both available and affordable housing in those CTs.

Responses to Complaints

There were no complaints related to Fifth District's CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

Fifth District's performance under the Community Development Test in the state of Louisiana is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, Fifth District exhibited adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the capacity and the need and availability of such opportunities for community development in the AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: CD Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
New Orleans MSA AA	3	60.0	792	56.9
Slidell MSA AA	1	20.0	50	3.6
Broader, Statewide, or Regional	1	20.0	550	39.5
Total	5	100.0	1,392	100.0

Fifth District made an adequate level of CD loans. While Fifth District is primarily a mortgage lender, during the evaluation period management purchased business loans from a non-bank lender that offered more flexible terms than traditional banks. Several of these loans qualified as economic development, through job creation or retention. Fifth District also originated one CD loan outside of its AA that qualified for economic development. Collectively, these CD loans represented two percent of allocated tier one capital (one percent for each AA).

The following are examples of CD loans Fifth District originated or purchased in this AA:

- Three purchased loans in the New Orleans MSA AA totaling \$792,000. One loan was to an environmental related start-up business; one to a masonry business; and one to a nail salon. All three businesses created or retained low- or moderate-income jobs.
- One loan for \$550,000 originated to a winery warehouse bordering its New Orleans MSA AA. While outside the AA, many of the business's employees reside in the greater New Orleans area, which includes the bank's AA. The company employs low- and moderate-income individuals.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
AA	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New Orleans MSA AA	1	116	24	32	25	65.8	148	2.4	0	0
Slidell MSA AA	0	0	3	4	3	7.9	4	0.1	0	0
Broader, Statewide or Regional	6	3,010	4	3,108	10	26.3	6,118	97.6	0	0
Total	7	3,126	31	3,144	38	100	6,270	100	0	0

Fifth District had an adequate level of qualified investments and donations in the AA. This was complimented with an excellent level of investments and donations in the broader/statewide area. The broader/statewide investments had a positive impact on the overall CD rating.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

In the New Orleans MSA AA, the bank had one prior-period bond with an outstanding balance as of \$116,000, and 24 donations to 13 entities totaling \$32,000. All donations were to organizations that provided services targeted to low- and moderate-income individuals. This represented less than one percent of allocated tier one capital.

Additionally, in the broader/statewide area, Fifth District had six prior-period investments with outstanding balances of \$3 million; two new investments totaling \$3.1 million; and two donations totaling \$3,000. These broader, regional investments represented six percent of total tier one capital.

The following are examples of qualified investments:

- Fifth District had one prior-period investment in New Orleans with an outstanding balance as of \$116,000 that supported affordable housing.
- Fifth District purchased a \$2 million mortgage-backed security providing affordable housing for senior citizens.
- Fifth District purchased a \$1.1 million Small Business Administration (SBA) CRA bond that supports economic development.
- Five of the prior-period investments further supported economic development through SBA CRA bonds.
- One of the prior-period investments supported affordable housing. The apartment unit supported by the bond had 97 percent of its units occupied with residents having below 50 percent of median income.

Extent to Which Fifth District Provides CD Services

Fifth District provided excellent responsiveness through approximately 985 hours of CD services in the New Orleans MSA AA. These service hours include 450 hours from the former bank president, who served as chairman of the board for a local hospital that provided several programs to assist low- and moderate-income families with medical costs.

The following is an example of qualified services:

- Several bank employees provided qualifying CD services hours and internships to an organization focused on reducing disparities and filling critical talent gaps in the local corporate workforce. The organization seeks to create, find, and strengthen pathways for first generation college students to access employment opportunities and competitive wages, with their fellowship program connecting Louisiana residents who are college students to paid internship opportunities and provides nearly a year of soft skill development training to support both personal and professional growth and success as students transition from academic to adult life.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 – 12/31/2024	
Bank Products Reviewed:	Home mortgage CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Louisiana		
New Orleans MSA AA	Full-Scope	St. Tammany Parish was removed and added to the Slidell MSA in 2024.
Slidell MSA AA (2024)	NA	Slidell MSA AA (St. Tammany Parish) did not have enough loans to allow for meaningful analysis.

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Rating
Fifth District Savings Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Louisiana	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any MMSA or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

Rating Area: A rated area is a state or MMSA. 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 MMSA, the institution will receive a rating for the MMSA.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either

secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. AA Distribution of Home Mortgage Loans by Income Category of the Geography -**
Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. AA Distribution of Home Mortgage Loans by Income Category of the Borrower -**
Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table 7: AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
New Orleans MSA	166	60,084	100.00	27,208	3.53	1.81	2.84	17.77	9.64	14.75	36.43	37.35	34.71	42.27	51.20	47.70	--	--	--
Total	166	60,084	100.00	27,208	3.53	1.81	2.84	17.77	9.64	14.75	36.43	37.35	34.71	42.27	51.20	47.70	--	--	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
New Orleans MSA 2024	39	15,953	86.67	--	3.34	2.56	--	19.18	10.26	--	32.79	33.33	--	44.68	53.85	--	--	--	--
Slidell MSA 2024	6	2,590	13.33	--	--	--	--	4.51	--	--	69.96	83.33	--	25.54	16.67	--	--	--	--
Total	45	18,543	100.00	--	2.58	2.22	--	15.84	8.89	--	41.26	40.00	--	40.32	48.89	--	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New Orleans MSA	166	60,084	100.00	27,208	22.30	3.01	5.10	14.89	10.24	15.71	18.87	16.87	19.27	43.94	69.88	39.59	--	--	20.33
Total	166	60,084	100.00	27,208	22.30	3.01	5.10	14.89	10.24	15.71	18.87	16.87	19.27	43.94	69.88	39.59	--	--	20.33
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New Orleans MSA 2024	39	15,953	86.67	--	22.44	2.56	--	14.93	7.69	--	18.92	15.38	--	43.71	71.79	--	--	2.56	--
Slidell MSA 2024	6	2,590	13.33	--	16.81	--	--	15.71	--	--	21.16	33.33	--	46.33	66.67	--	--	--	--
Total	45	18,543	100.00	--	21.24	2.22	--	15.10	6.67	--	19.40	17.78	--	44.27	71.11	--	--	2.22	--
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			