



PUBLIC DISCLOSURE

January 05, 2026

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Clarksdale

Charter Number: 15284

402 East Second Street
Clarksdale, MS 38614

Office of the Comptroller of the Currency

Little Rock Office
1401 West Capitol Avenue
Suite 350
Little Rock, AR 72201

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 First National Bank of Clarksdale’s (FNBC or bank) satisfactory lending performance within the state of Mississippi. During the evaluation period, the bank’s loan-to-deposit (LTD) ratio is reasonable, and a majority of loans originated are within the assessment area (AA).
- The Community Development (CD) Test rating is based on the bank’s performance in the state of Mississippi. The bank provides adequate response to the CD needs in the AA.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s LTD ratio is reasonable.

Over the last 12 quarters the average LTD was 67 percent. The highest was 73.2 percent in third quarter 2023 and the lowest at 57.7 percent in first quarter of 2023. The quarterly average LTD ratio for institutions similarly situated was 57.9 percent and ranging from 65.4 percent and 52.7 percent.

Lending in Assessment Area

A majority of the bank’s loans were inside its AA.

The bank originated and purchased 67.7 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	48	80.0	12	20.0	60	2,165	80.0	540	20.0	2,705
Small Farm	28	46.7	32	53.3	60	1,261	40.7	1,837	59.3	3,098
Consumer	44	73.3	16	26.7	60	1,984	73.3	722	26.7	2,706
Total	120	67.7	60	33.3	180	5,411	63.6	3,098	36.4	8,509

*Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

First National Bank of Clarksdale is an independent, single-state bank that opened for business in 1964. FNBC is 100 percent owned by First Valley National Corp., a one-bank holding company. Both entities are headquartered in Clarksdale, Coahoma County, Mississippi (Miss.).

The main branch is in Clarksdale, Coahoma County, and four additional branches are in Clarksdale and Oxford. The bank has automated teller machines (ATMs) at all branches.

FNBC offers a full range of loan and deposit services. FNBC's primary business focus is consumer, business, and agriculture lending. As of December 31, 2024, FNBC had total assets and loans of approximately \$376.3 million and \$232.3 million, respectively. Gross loans comprised 61.7 percent of total assets. Tier 1 capital was approximately \$47.7 million. FNBC's loan portfolio consists of 36.1 percent agricultural and farmland loans, 27.2 percent commercial and industrial loans, and 3.4 percent individual loans. However, most loans originated during the evaluation period were loans to individuals. Agricultural loan balances are cyclical and peak during the third quarter and pay down significantly during the fourth and first quarters annually.

FNB's business strategy includes the continued marketing of commercial credit to small businesses and small farms through its products, staff, and locations. The bank originates agricultural, commercial, home mortgage, and consumer loans to customers located primarily in Coahoma and Lafayette counties. Agricultural lending activity includes all types of row crop, poultry, and cattle lending. Lending activity for Lafayette County consists primarily of commercial loans.

There have been no major changes in the bank's corporate structure, including merger or acquisition activities since the prior CRA Performance Evaluation (PE). The last CRA PE, dated November 28, 2022, assigned a "Satisfactory" rating to the bank. There are no financial conditions, legal constraints, or other factors impeding the bank's ability to help meet the credit needs in its AA. We did not consider the act of affiliates in this evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC examined FNBC using Intermediate Small Bank evaluation procedures for years 2022 and 2023 and Small Bank evaluation procedures for year 2024. The evaluation period for this review is January 1, 2022, through December 31, 2024. Loan products used to assess the bank's performance under the Lending Test included small loans to businesses, small loans to farms, and consumer loans. Examiners used a sample of 20 loans for each product and evaluation year for a total of 180 loans during the evaluation period to assess lending performance within various income levels and geographies.

Selection of Areas for Full-Scope Review

In each state where the bank 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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable, are combined and evaluated in 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 “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.

Ratings

The bank’s overall rating is based on the performance in the state of Mississippi.

The state rating is based on the performance of the Miss. Non-MSA. Refer to the “Scope” section under the State Rating for details regarding how areas were weighted in arriving at the respective ratings.

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 evaluation.

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

State Rating

State of Mississippi

CRA rating for the State of Mississippi: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- The bank exhibits adequate responsiveness to the CD needs in its AA.

Description of Institution’s Operations in Mississippi

FNBC operates in one AA in the state of Mississippi as described in the “Description of the Institution” and the “Scope of Evaluation” sections of this PE. Bank deposits are primarily located within the AA. Over the evaluation period, the majority of loans originated by either dollar volume or loan number was small loans to businesses, small loans to farms, and consumer loans. The bank’s competitors include other community banks and some of the United States’ largest, nationwide commercial banks with branches in the geographies. To determine the credit needs of the communities, we reviewed recent housing and demographic information and contacted a service organization in the AA.

Mississippi Non-MSA

Assessment Area – Mississippi Non-MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	4.6	22.7	40.9	31.8	0.0
Population by Geography	77,203	3.9	21.9	43.1	31.2	0.0
Housing Units by Geography	36,790	5.1	22.4	37.6	34.9	0.0
Owner-Occupied Housing by Geography	16,052	4.8	21.4	39.3	34.4	0.0
Occupied Rental Units by Geography	11,147	5.4	25.5	36.5	32.6	0.0
Vacant Units by Geography	9,591	5.1	20.3	36.1	38.5	0.0
Businesses by Geography	3,369	1.7	20.7	32.2	45.4	0.0
Farms by Geography	246	4.5	15.9	57.3	22.4	0.0
Family Distribution by Income Level	16,347	22.8	14.5	16.2	46.5	0.0
Household Distribution by Income Level	27,199	25.5	12.4	15.1	47.1	0.0
Unemployment rate (%)	6.1	18.5	10.9	4.7	3.9	0.0
Households Below Poverty Level (%)	23.7	48.0	32.7	18.4	19.9	0.0
Median Family Income (Non-MSA – MS)		\$52,591			Median Housing Value	\$166,550
Median Family Income (Non-MSA – MS) for 2024		\$64,400			Median Gross Rent	\$848
					Families Below Poverty Level	17.6
FFIEC File - 2024 Census						
2024 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 Miss. Non-MSA comprises the entirety of Coahoma and Lafayette counties and does not arbitrarily exclude any low- or moderate-income CTs. Of the 22 CTs for 2022-2023, there was one low-income CT, five moderate-income CTs, ten middle-income CTs, and six upper-income CTs. Of the 22 CTs for 2024, there was one low-income CT, five moderate-income CTs, nine middle-income CTs and seven upper-income CTs. There are two CTs designated as distressed in the AA. Most the population, 43.1 percent, lives in the middle-income CTs and only 3.9 percent live in the low-income CTs and 21.9 percent live in the moderate-income CTs. This is reasonable as 37.6 percent of housing units are in the middle-income tracts and 5.1 percent and 22.4 percent are in the low- and moderate-income tracts, respectively.

FNBC's main office is in Clarksdale, MS, within the Miss. Non-MSA. The bank has positioned all branches within this AA. As of the June 30, 2024, the Federal Deposit Insurance Corporation (FDIC) Market Share Report shows the bank has the second largest market share in the AA totaling 12.9 percent.

The largest city within Coahoma County is Clarksdale, MS, and the largest city within Lafayette County is Oxford, MS. The Miss. Non-MSA has a population of 77,203 and includes the cities of Clarksdale, Oxford, Lyon, Tutwiler, and Abbeville.

To help identify the financial needs in Coahoma County, the OCC held a discussion with a couple of organizations within the county. Some of the areas the organizations serve have either improved or remained unchanged economically. The biggest needs for Coahoma County are financial literacy training, assistance to small businesses, and homeownership education.

To help identify the financial needs of Lafayette County, the OCC held a discussion with an organization that specializes in economic development in Lafayette County. The area has experienced continued growth with an increase in population. Therefore, housing prices have increased as housing supply remains low. Per the organization, the biggest needs for Lafayette County are affordable housing and small business lending.

Scope of Evaluation in Mississippi

The Miss. Non-MSA received a full-scope review. No limited-scope reviews were conducted. Refer to the table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Mississippi

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table 9 in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's geographic distribution of small loans to businesses is reasonable. The bank's volume of small loans to businesses in low-income CTs totaled 12.5 percent, which exceeds the percentage of businesses in the low-income CTs and the aggregate level of lending. The bank's volume of small loans to businesses in moderate-income CTs totaled 18.8 percent, which is somewhat lower than the percentage of businesses in the moderate-income CTs, but exceeds the aggregate level of lending.

Small Loans to Farms

Refer to Table 11 in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank's geographic distribution of small loans to farms is reasonable. The bank's volume of small loans to farms in low-income CTs totaled 3.6 percent, which is somewhat lower than the percentage of farms in low-income CTs and the aggregate lending level. The bank's volume of small loans to farms in moderate-income CTs totaled 10.7 percent, which is lower than the percentage of small farms in moderate-income CTs, but exceeds the aggregate level of lending.

Consumer Loans

Refer to Table 13 in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank's geographic distribution of consumer loans is reasonable. The bank's volume of consumer loans in low-income CTs totaled 2.3 percent, which is somewhat lower than the percentage of households in low-income CTs. The bank's volume of consumer loans in moderate-income CTs totaled 63.6 percent, which exceeds the percentage of households in moderate-income CTs. Aggregate data is not available for consumer lending analysis.

Lending Gap Analysis

We evaluated the lending distribution in the bank's AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

Refer to Table 10 in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The income distribution of small loans to businesses is reasonable. The bank's volume of loans to business with revenues less than \$1 million is lower than the percentage of businesses with revenues under \$1 million, but exceeds the aggregate lending level.

Small Loans to Farms

Refer to Table 12 in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The income distribution of small loans to farms is reasonable. The bank's volume of loans to farms with revenues less than \$1 million is lower than the percentage of farms with revenues under \$1 million, but exceeds the aggregate level of lending.

Consumer Loans

Refer to Table 14 in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The income distribution of consumer loans to low- and moderate-income borrowers is excellent. The level of consumer loans to low-income borrowers is consistent with the percentage of low-income borrowers in the AA. The level of consumer loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA.

Responses to Complaints

There were no complaints related to the institution's CRA performance within the state of Mississippi during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Mississippi Non-MSA	4	57.1%	\$138	54.8%
Broader Statewide or Regional Area	3	42.9%	\$114	45.2%
Total	7	100.0%	\$252	100.0%

The bank's level of CD lending demonstrates adequate responsiveness to the CD needs within the AA. During the evaluation period, the bank originated or renewed four CD loans in the AA totaling approximately \$138,000.

- One loan to an apartment complex providing two-bedroom units under the median gross rent for the AA.
- Three loans to borrowers providing rental properties under the median gross rent for the AA.

In the broader statewide or regional area, the bank originated or renewed three CD loans totaling approximately \$114,000.

- Two loans to organizations providing community services.
- One loan to a borrower providing rental property under the median gross rent.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Miss. Non-MSA	--	--	19	\$8	19	70.4%	\$8	0.7%	--	--
Broader Statewide or Regional Area	2	\$608	6	\$520	8	29.6%	\$1,128	99.3%	--	--
Total	2	\$608	25	\$528	27	100.0%	\$1,136	100.0%	--	--

The bank's level of qualified investments and donations demonstrates adequate responsiveness to the CD needs of its AA. There is a limited number of qualified investments available for purchase, and it is often difficult for small community banks to compete against large, nationwide, and regional banks. The bank's qualified investments are concentrated in statewide and regional investment opportunities.

- The bank funded \$520,000 into the committed \$1 million investment funds. The investment funds include Pharos Capital Group and small business investment company (SBIC) Caltius Equity Partners.
- The bank made a total of 19 donations totaling \$8,000 to qualified organizations in Coahoma and Lafayette counties. The organizations promote economic development and community services.

Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of CD services in its AA. Bank employees provide financial expertise and knowledge to various local non-profits focused on economic development and community services.

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2022, to December 31, 2024	
Bank Products Reviewed:	Small business, small farm, consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Mississippi		
Mississippi Non-MSA	Full-scope	Entirety of Coahoma and Lafayette Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Clarksdale	Satisfactory	Satisfactory	Satisfactory
State:			
Mississippi	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/assessment area.

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area 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 community development.

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million;

and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2024**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Miss. Non-MSA	48	5,285	100.0	2,954	1.7	12.5	2.1	20.7	18.8	18.0	32.2	54.2	36.8	45.4	14.6	43.1	--	--	--
Total	48	5,285	100.0	2,954	1.7	12.5	2.1	20.7	18.8	18.0	32.2	54.2	36.8	45.4	14.6	43.1	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miss. Non-MSA	48	5,285	100.0	2,954	84.3	50.0	46.9	3.4	39.6	12.2	10.4
Total	48	5,285	100.0	2,954	84.3	50.0	46.9	3.4	39.6	12.2	10.4

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-2024**

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Miss. Non-MSA	28	5,061	100.0	182	4.5	3.6	4.4	15.9	10.7	9.9	57.3	78.6	74.2	22.4	7.1	11.5	--	--	--
Total	28	5,061	100.0	182	4.5	3.6	4.4	15.9	10.7	9.9	57.3	78.6	74.2	22.4	7.1	11.5	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue **2022-2024**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Miss. Non-MSA	28	5,061	100.0	182	97.2	42.9	35.2	2.4	50.00	0.4	7.1
Total	28	5,061	100.0	182	97.2	42.9	35.2	2.4	50.0	0.4	7.1

Source: FFIEC File - 20XX Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2024	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Miss. Non-MSA	44	585	100.0	5.1	2.3	23.1	63.6	38.2	29.5	33.7	4.5	--	--	
Total	44	585	100.0	5.1	2.3	23.1	63.6	38.2	29.5	33.7	4.5	--	--	

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.
 Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2024	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Miss. Non-MSA	44	585	100.0	25.5	25.0	12.4	15.9	15.1	20.5	47.1	15.9	--	22.7	
Total	44	585	100.0	25.5	25.0	12.4	15.9	15.1	20.5	47.1	15.9	--	22.7	

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%