



## **PUBLIC DISCLOSURE**

December 01, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First National Bank of Commerce  
Charter Number: 11312

206 West Main Street  
Walnut Ridge, AR 72476

Office of the Comptroller of the Currency

Little Rock Office  
1401 West Capitol Ave  
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 major factors that support this rating include:

- The Lending Test rating is based on First National Bank of Commerce's (FNBC or bank) satisfactory lending performance within the state of Arkansas. During the evaluation period, the bank's loan-to-deposit (LTD) ratio is reasonable, and a substantial majority of loans originated are within the assessment areas (AAs).

### Loan-to-Deposit Ratio

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

Over the last 18 quarters the average LTD was 48.5 percent. The highest was 53.8 percent in third quarter of 2021 and the lowest was 47.2 percent in fourth quarter of 2022. The quarterly average LTD ratio for institutions similarly situated was 95.6 percent percent ranging from 76.4 percent to 113.8 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans were inside its AAs.

The bank originated and purchased 93.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	183	92.0	16	8.0	199	17,787	91.8	1,589	8.2	19,376
Small Business	60	100.0	0	0.00	60	5,651	100.0	0	0.0	5,651
<b>Total</b>	243	93.8	16	6.2	259	23,438	93.7	1,589	6.4	25,027

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

## Description of Institution

The First National Bank of Commerce is an independent, single-state bank that opened for business in March 1919. FNBC is 100 percent owned by First National Capital Corporation (FNCC), a one-bank holding company. Both entities are headquartered in Walnut Ridge, Lawrence County, Arkansas (Ark.). The holding company owns Service Abstract and Title Incorporated, a wholly owned subsidiary, that provides professional real estate and other loan closing services to title services and title insurance. The affiliate has no lending products for consideration in this performance evaluation (PE).

The main branch is in Walnut Ridge, Lawrence County, and five additional branches are in Hoxie, Pocahontas, Pocahontas North, Bono, and Imboden. 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 commercial lending as well as agricultural. As of December 31, 2024, FNBC had total assets and loans of approximately \$287.1 million and \$125.6 million, respectively. Gross loans comprised 43.7 percent of total assets. Tier one capital was approximately \$30.2 million. FNBC's loan portfolio consists of 41.8 percent agricultural and farmland loans, 13.8 percent commercial and industrial loans, 3.2 percent individual loans, and 28.7 percent one- to four-family residential loans. However, most loans originated during the evaluation period were small loans to businesses. Agricultural loan balances are cyclical and peak during the third quarter and pay down significantly during the fourth and first quarters annually.

FNBC's business strategy includes the continued marketing of commercial credit to small businesses and individuals through its products, staff, and locations. The bank originates agricultural, commercial, home mortgage, and consumer loans to customers located primarily in Pocahontas, Walnut Ridge, Hoxie, and Imboden.

FNBC has two AAs in Arkansas, and Examiners assessed both AAs under this evaluation. The Ark. Non-Metropolitan Statistical Area (MSA) consists of Lawrence and Randolph counties. Combined, the two counties have 11 census tracts (CTs). Of the 11 CTs, there are no low-income CTs, two moderate-income CTs, nine middle-income CTs, and no upper CTs. The bank's second AA is in the Jonesboro MSA consisting of Craighead County. The Jonesboro MSA consist of 22 CTs. The 22 CTs include one low-income CT, five moderate-income CTs, nine middle-income CTs, and seven upper-income CTs. FNBC has greater lending activity in the Ark. Non-MSA than the Jonesboro MSA, and both AAs include the full counties. The bank's AAs meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income geographies.

There have been no major changes in the bank's corporate structure, including merger or acquisition activities, since the prior CRA PE. The previous CRA PE, dated September 06, 2022, assigned a "Satisfactory" rating to the bank. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to meet the credit needs of its AAs. We did not consider the act of affiliates in this evaluation

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

Examiners examined FNBC using Small Bank evaluation procedures. 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 home mortgage loans and small loans to businesses. Examiners used a sample of 60 small loans to businesses and Home Mortgage Disclosure Act (HMDA) data during the evaluation period to assess lending performance within various income levels.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of the 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 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.

### **Ratings**

The bank's overall rating is based on the performance in the state of Arkansas.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the 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 Arkansas

**CRA rating for the State of Arkansas:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans across geographies of different income levels is good.
- The borrower distribution of loans to borrowers of different income levels is good.

## Description of Institution’s Operations in Arkansas

FNBC operates in two AAs in the state of Arkansas as described in the “Description of the Institution” and the “Scope of Evaluation” sections of this PE. The two AAs are the Ark. Non-MSA and the Jonesboro MSA. Most of the bank’s deposits and lending activity are in the two AAs. Over the evaluation period, most loans originated were small loans to businesses. The bank’s competitors include other local 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. We also reviewed current community contacts with service organizations in the AAs.

### Arkansas Non-MSA

Assessment Area(s) – Arkansas Non-MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.00	18.18	81.82	0.00	0.00
Population by Geography	34,787	0.00	13.28	86.72	0.00	0.00
Housing Units by Geography	16,659	0.00	15.27	84.73	0.00	0.00
Owner-Occupied Housing by Geography	9,959	0.00	14.22	85.78	0.00	0.00
Occupied Rental Units by Geography	3,919	0.00	16.99	83.01	0.00	0.00
Vacant Units by Geography	2,781	0.00	16.58	83.42	0.00	0.00
Businesses by Geography	784	0.00	10.33	89.67	0.00	0.00
Farms by Geography	182	0.00	7.69	92.31	0.00	0.00
Family Distribution by Income Level	9,453	21.19	18.38	21.10	39.33	0.00
Household Distribution by Income Level	13,878	24.24	18.02	16.4	41.40	0.00
Unemployment rate (%)	6.03	0.00	6.96	5.89	0.00	0.00
Households Below Poverty Level (%)	17.28	0.00	19.02	16.97	0.00	0.00
Median Family Income (Non-MSAs - AR)		\$53,596			Median Housing Value	\$79,300
Median Family Income (Non-MSAs - AR) for 2024		\$64,800			Median Gross Rent	\$581
					Families Below Poverty Level	11.93

FFIEC File - 2020 Census

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 Ark. Non-MSA comprises the entirety of Lawrence and Randolph counties and does not arbitrarily exclude any low- and moderate-income CTs. Of the 11 CTs, there are no low-income CTs, two moderate-income CTs, nine middle-income CTs, and no upper-income CTs. There are no CTs designated as underserved or distressed in this AA. Most of the population, 86.7 percent, lives in the middle-income CTs and only 13.3 percent of the population lives in the moderate-income CT. This is reasonable as 84.7 percent of the housing units are in the middle-income tracts while 15.3 percent of the housing units are in the moderate-income tracts.

FNBC’s main office is in Walnut Ridge, AR, within the Ark. Non-MSA. Five of the bank’s six branches are located within this AA. As of the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Market Share Report, the bank has the primary deposit market share in Lawrence and Randolph counties totaling 32 percent.

The largest cities within Lawrence and Randolph counties are Walnut Ridge and Pocahontas, respectively. The bank has branches in both cities. The Ark. Non-MSA has a population of 34,787 and includes the towns of Walnut Ridge, Pocahontas, Black Rock, Hoxie, and Imboden. Community contacts agree that some of the needs in the community are affordable housing, access to workforce development and community service access, and broadband access.

## Jonesboro MSA

Assessment Area(s) – Jonesboro MSA						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	4.55	22.73	40.91	31.82	0.00
Population by Geography	111,231	5.50	22.03	39.26	33.21	0.00
Housing Units by Geography	46,156	4.66	22.62	41.61	31.11	0.00
Owner-Occupied Housing by Geography	24,055	0.50	16.68	39.21	43.60	0.00
Occupied Rental Units by Geography	18,148	8.97	28.85	45.18	17.00	0.00
Vacant Units by Geography	3,953	10.25	30.15	39.79	19.81	0.00
Businesses by Geography	3,466	2.57	26.14	38.06	33.24	0.00
Farms by Geography	283	1.06	24.03	36.40	38.52	0.00
Family Distribution by Income Level	27,829	20.74	15.89	19.53	43.84	0.00
Household Distribution by Income Level	42,203	22.69	16.91	16.62	43.78	0.00
Unemployment rate (%)	5.82	14.49	7.41	6.82	2.60	0.00
Households Below Poverty Level (%)	16.36	43.71	28.11	15.42	6.06	0.00
Median Family Income (27860 – Jonesboro, AR MSA)		\$60,922			Median Housing Value	\$143,100
Median Family Income (27860 – Jonesboro, AR MSA) for 2024		\$82,700			Median Gross Rent	\$800
					Families Below Poverty Level	12.18
FFIEC File - 2020 Census 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 Jonesboro MSA consists of Craighead County and does not arbitrarily exclude any low- or moderate-income CTs. The MSA has 22 census tracts. There are no CTs designated underserved or distressed in this AA. The 22 CTs include one low-income CT, five moderate-income CTs, nine middle-income CTs, and seven upper-income CTs.

The Jonesboro MSA is a very competitive market against various national and regional banks. During the evaluation period, the bank had one branch located in the Jonesboro MSA. This branch is in Bono, Arkansas, which is in the most northwestern part of the AA. The Jonesboro MSA does not generate a

significant portion of deposits or lending activity. As of June 30, 2024, FDIC Market Share Report the bank's deposit market share is 0.5 percent. A community contact states that the needs of the community include affordable housing development and preservation.

## **Scope of Evaluation in Arkansas**

FNBC has two AAs in the state of Arkansas. The Ark. Non-MSA received a full-scope review as the substantial majority of the bank's deposits are located in this AA. Refer to the table in Appendix A for list of all AAs under review.

## **LENDING TEST**

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

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Ark. Non-MSA was reasonable.

## **Distribution of Loans by Income Level of the Geography**

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

### ***Home Mortgage Loans***

Refer to Table 7 in the State of Arkansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank's geographic distribution of home mortgage loans among geographies of different income levels is good. The bank's volume of one- to four-family residential loans to borrowers in moderate-income CTs totaled 14.8 percent, which is consistent to the percentage of owner-occupied units in the moderate-income CTs and exceeds the aggregate lending level.

### ***Small Loans to Businesses***

Refer to Table 9 in the state of Arkansas 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 good. As stated above, there were no low-income CTs within the AA. During the evaluation period, the bank's volume of small loans to businesses in moderate-income CTs totaled 12.2 percent, which exceeds the percentage of businesses in the moderate-income CTs and the aggregate lending level.

### ***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 the performance context.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited 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.

### ***Home Mortgage Loans***

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

The income distribution of home mortgage loans to low- and moderate-income borrowers is good. The level of mortgage loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the AA and exceeds the aggregate lending level. The level of mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income borrowers in the AA and the aggregate lending level.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of Arkansas 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 good. The bank's volume of loans to businesses with revenues less than \$1 million exceeds the percentage of businesses with revenues under \$1 million and the aggregate lending level.

### **Responses to Complaints**

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

### **Conclusions for Area Receiving Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Jonesboro MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

## 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 MSAs and non-MSAs 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”.

<b>Time Period Reviewed:</b>	January 1, 2022, to December 31, 2024	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Arkansas</b>		
Arkansas Non-MSA	Full-scope	Entirety of Lawrence and Randolph Counties
Jonesboro MSA	Limited-scope	Partial Jonesboro MSA 27860. AA composed of Craighead County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	
Overall Bank:	Lending Test Rating
First National Bank of Commerce	Satisfactory
State:	
Arkansas	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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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 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/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 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

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### 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 30<sup>th</sup> 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. Assessment Area 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. Assessment Area 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.

**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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022-2024**

Assessment Area:	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
Ark. Non-MSA	176	15,940	96.2	2,025	--	0.0	--	14.2	14.8	11.6	85.8	85.2	88.4	--	0.0	--	--	0.0	--
Jonesboro MSA	7	1,847	3.8	9,098	0.5	0.0	0.9	16.7	28.6	17.9	39.2	0.0	37.0	43.6	71.4	44.3	--	0.0	--
<b>Total</b>	<b>183</b>	<b>17,787</b>	<b>100.0</b>	<b>11,123</b>	<b>0.4</b>	<b>0.0</b>	<b>0.7</b>	<b>16.0</b>	<b>15.3</b>	<b>16.8</b>	<b>52.9</b>	<b>82.0</b>	<b>46.3</b>	<b>30.8</b>	<b>2.7</b>	<b>36.2</b>	<b>--</b>	<b>0.0</b>	<b>--</b>

*Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-2024**

Assessment Area:	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
Ark. Non-MSA	176	15,940	96.2	2,025	21.2	15.3	7.9	18.4	14.8	17.6	21.1	22.2	21.8	39.3	44.3	33.2	--	3.4	19.6
Jonesboro MSA	7	1,847	3.8	9,098	20.7	14.3	5.6	15.9	14.3	14.6	19.5	14.3	18.1	43.8	57.1	34.1	--	0.0	27.6
<b>Total</b>	<b>183</b>	<b>17,787</b>	<b>100.0</b>	<b>11,123</b>	<b>20.9</b>	<b>15.3</b>	<b>6.0</b>	<b>16.5</b>	<b>14.8</b>	<b>15.2</b>	<b>19.9</b>	<b>21.9</b>	<b>18.7</b>	<b>42.7</b>	<b>44.8</b>	<b>34.0</b>	<b>--</b>	<b>3.3</b>	<b>26.1</b>

*Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**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
Ark. Non-MSA	41	3,321	100.0	759	--	0.0	--	10.3	12.2	9.2	89.7	87.8	90.8	--	0.0	--	--	0.0	--
Jonesboro MSA	--	--	--	5,801	2.6	0.0	1.1	26.1	0.0	25.2	38.1	0.0	38.9	33.2	0.0	34.8	--	0.0	--
<b>Total</b>	<b>41</b>	<b>3,321</b>	<b>100.0</b>	<b>6,560</b>	<b>2.1</b>	<b>0.0</b>	<b>1.0</b>	<b>23.2</b>	<b>12.2</b>	<b>23.4</b>	<b>47.6</b>	<b>87.8</b>	<b>44.9</b>	<b>27.1</b>	<b>0.0</b>	<b>30.8</b>	<b>--</b>	<b>0.0</b>	<b>--</b>

*Source: FFIEC File – 2020, 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%  
\*Given the low volume of loans made to small businesses within the Jonesboro MSA, it was not included in the analysis.*

<b>Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-2024</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total Number</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Ark. Non-MSA	41	3,321	100.0	759	75.1	85.4	56.1	4.2	12.2	20.7	2.4
Jonesboro MSA	--	--	--	5,801	82.7	0.0	56.5	4.7	0.0	12.6	0.0
<b>Total</b>	<b>41</b>	<b>3,321</b>	<b>100.0</b>	<b>6,560</b>	<b>81.3</b>	<b>85.4</b>	<b>56.5</b>	<b>4.6</b>	<b>12.2</b>	<b>14.1</b>	<b>2.4</b>

Source: FFIEC File – 2020, 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%  
 \*Given the low volume of loans made to small businesses within the Jonesboro MSA, it was not included in the analysis.