



## **PUBLIC DISCLOSURE**

March 30, 2026

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

The First National Bank of Tom Bean  
Charter Number: 11019

109 Britton Street  
Tom Bean, TX 75489-0098

Office of the Comptroller of the Currency

225 E. John Carpenter Fwy  
Suite 900  
Irving, TX 75062

**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 bank's quarterly average loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans were originated or purchased inside the bank's AAs.
- The geographic distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment areas, the bank's LTD ratio is reasonable. The First National Bank of Tom Bean (FNB or bank) quarterly LTD ratio averaged 83.9 percent since the previous Community Reinvestment Act (CRA) Performance Evaluation (PE). We compared the bank's LTD ratio to three similarly situated banks in their market area with assets ranging from approximately \$148 million to \$245 million. The aggregate average LTD ratio for competing banks was 85.2 percent, with a low average of 58.3 percent and a high average of 99.1 percent.

### Lending in Assessment Area

A majority of the bank's loans were made within its AAs. The bank originated 65.5 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's level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

| Table 1: Lending Inside and Outside of the Assessment Area |                 |      |         |      |         |                                 |      |         |      | 2022 - 2024    |
|------------------------------------------------------------|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|
| Loan Category                                              | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |      |         |      | Total \$(000s) |
|                                                            | Inside          |      | Outside |      |         | Inside                          |      | Outside |      |                |
|                                                            | #               | %    | #       | %    |         | \$                              | %    | \$      | %    |                |
| Home Mortgage                                              | 131             | 64.2 | 73      | 35.8 | 204     | 26,277                          | 62.1 | 16,030  | 37.9 | 42,307         |
| Small Business                                             | 42              | 70.0 | 18      | 30.0 | 60      | 3,543                           | 44.1 | 4,494   | 55.9 | 8,037          |
| Total                                                      | 173             | 65.5 | 91      | 34.5 | 264     | 29,820                          | 59.2 | 20,524  | 40.8 | 50,344         |
| Source: 1/1/2022 - 12/31/2024 Bank Data.                   |                 |      |         |      |         |                                 |      |         |      |                |
| Due to rounding, totals may not equal 100.0%               |                 |      |         |      |         |                                 |      |         |      |                |

FNB's lending in its AAs meets the standard for satisfactory performance. Our analysis included 204 home mortgage loans and 60 small business loans originated or renewed in 2022, 2023, and 2024. The bank originated 70 percent of small business loans by number and 44.1 percent by dollar of small

business loans inside their AAs. The bank also originated 64.2 percent of home mortgages, or 62.1 percent by dollar amount, inside their AAs.

## Description of Institution

As of December 31, 2024, the bank's assets totaled 143.1 million, liabilities totaled \$126.9 million, and equity capital totaled \$16.1 million. Gross loans totaled \$105.2 million representing 73.6 percent of total assets. Residential real estate loans represented 44.3 percent of gross loans. Commercial and commercial real estate loans, both of which include small business loans, represented 44 percent of gross loans. Consumer loans totaled 11.8 percent. Total investments were \$28 million, which represented approximately 20 percent of total assets. Tier 1 capital totaled \$16.1 million. Based on these numbers, we determined the bank's primary lending products for this evaluation were residential real estate mortgages and small business loans. The bank was established in July 1906 and became nationally chartered in 1917. The bank is headquartered in Tom Bean, Texas, southeast of Sherman, Texas, and north of Dallas.

The bank operates four full-service banking facilities, located in northeast Texas and southwest Arkansas:

- 109 S. Britton, Tom Bean, Texas 75489 (Main Office) census tract (CT) 18.02 – Upper-income CT – Grayson County.
- 2203 West Main St. Clarksville, Texas 76426 CT 9505.02 – Moderate-income CT – Red River County.
- 120 E. First Street, Lewisville, Ark. 71845 CT 4701.02 – Middle-income CT – Lafayette County.
- 301 N. Hervey Street, Hope, Ark. 71802 CT 4805.00 – Middle-income CT – Hempstead County.

FNB offers a full range of loan and deposit products and internet banking to individuals and businesses. Bank customers have access to online banking at [www.fnbtb.com](http://www.fnbtb.com). Additional banking services include debit and credit cards, wire transfers, money orders, and online banking. The bank does not engage in a significant level of advertising or marketing.

The bank's primary business focus is to serve consumer, commercial, and agricultural customers in all AAs. Branch hours and services do not vary in a way that inconveniences any portion of its AAs, particularly low and moderate income (LMI) individuals and geographies. All banking locations offer drive-through banking services and 24/7 access to non-deposit taking, Automated Teller Machines (ATMs) onsite. The bank has not opened or closed any branches since the previous CRA PE.

The previous CRA evaluation, dated January 24, 2022, assigned a "Satisfactory" rating to the bank. There are no legal or financial impediments to the bank's ability to meet the credit needs of its AAs. We did not consider the activities of affiliates in this evaluation.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for this evaluation was January 1, 2022, through December 31, 2024. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA). We conducted a data integrity review of the bank's HMDA data and found it to be reliable to use for assessing the bank's residential lending performance. We also selected samples for small business loans. Analysis of loans inside the AA may contain all loan types as that ratio is evaluated on a bank-wide basis.

For geographic and borrower distribution analyses, we compared lending performance data to 2020 census data effective January 2022. We used 2020 and 2024 US Census data to evaluate lending performance. Small loans to businesses were also compared to 2025 Dunn and Bradstreet (D&B) data.

### 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 was selected for a full-scope review. For purposes of this evaluation, the bank delineated AAs for the Sherman-Denison Metropolitan Statistical Area (MSA) AA, which was evaluated as a full-scope AA. The Texas Non-MSA AAs was evaluated as a limited-scope AA. Similarly, the bank delineated AAs for the Arkansas Non-MSA AA and was evaluated as a full-scope AA. 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 includes both Texas and Arkansas. Both states are equally weighted. We sampled the bank's two primary products – home mortgage loans and loans to small businesses. We gave equal weight to both products. Refer to the "Scope" section under each state rating section, if applicable, 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 bank's 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.

We did not identify that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

We 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 Texas

#### CRA rating for the State of Texas: Satisfactory

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of home mortgage and small business loans across geographies of different income levels in the State of Texas.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the State of Texas.

## Description of Institution's Operations in Texas

### Sherman-Denison MSA AA

The bank's primary focus is business loans and residential mortgage loans. As of the 2020 U.S. Census, the Sherman-Denison MSA AA included the county of Grayson and contained 30 CTs, of which 3.3 percent were low-income, 26.7 percent were moderate-income, 50 percent were middle-income, and 20 percent were upper-income. Grayson County does not have any underserved or distressed CTs. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income geographies. The bank operated one full-service branch with a drive-through and a non-deposit taking ATM within this AA. The branch is located in an upper-income CT. The branch serves as the bank's main office. Deposits from the Sherman-Denison MSA AA totaled \$45.8 million, or 36.6 percent of the bank's total deposits as of June 30, 2024. Approximately 43 percent of the loans originated during the evaluation period were in the Sherman-Denison MSA AA.

According to the FDIC, bank had 1.2 percent of the deposit market share in the AA as of June 30, 2024. Specifically, the bank ranked 11<sup>th</sup> out of 17 reporting institutions in the AA. The top three banks by deposit market share are First United Bank and Trust Company at 35.9 percent, Independent Bank at 19.4 percent, and Simmons Bank at 16.4 percent. Institutions with the largest branching network in this market include First United Bank and Trust Company (7 offices) and Independent Bank (5 offices). The top three banks hold a combined 71.7 percent market share. In this AA, competition can be particularly challenging for smaller banks as they strive to establish and expand their presence in a market dominated by larger institutions. Overall, the bank encounters a moderate level of competition that includes JPMorgan Chase Bank, N.A., a few super-regional banks, as well as community banks with longstanding roots in the local area.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Sherman-Denison MSA AA.

## Sherman-Denison MSA

| Assessment Area(s) - Sherman - Denison MSA                                                       |         |            |                              |               |              |            |
|--------------------------------------------------------------------------------------------------|---------|------------|------------------------------|---------------|--------------|------------|
| 2022 - 2024                                                                                      |         |            |                              |               |              |            |
| Demographic Characteristics                                                                      | #       | Low % of # | Moderate % of #              | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts)                                                                      | 30      | 3.33       | 26.67                        | 50.00         | 20.00        | 0.00       |
| Population by Geography                                                                          | 135,543 | 2.52       | 25.43                        | 48.85         | 23.20        | 0.00       |
| Housing Units by Geography                                                                       | 56,749  | 2.26       | 25.48                        | 49.96         | 22.30        | 0.00       |
| Owner-Occupied Housing by Geography                                                              | 33,648  | 2.05       | 20.72                        | 52.55         | 24.67        | 0.00       |
| Occupied Rental Units by Geography                                                               | 15,679  | 2.35       | 35.63                        | 45.76         | 16.26        | 0.00       |
| Vacant Units by Geography                                                                        | 7,422   | 2.98       | 25.61                        | 47.10         | 24.31        | 0.00       |
| Businesses by Geography                                                                          | 5,006   | 6.75       | 22.23                        | 45.96         | 25.05        | 0.00       |
| Farms by Geography                                                                               | 287     | 1.74       | 8.01                         | 59.58         | 30.66        | 0.00       |
| Family Distribution by Income Level                                                              | 33,765  | 20.33      | 18.99                        | 20.98         | 39.70        | 0.00       |
| Household Distribution by Income Level                                                           | 49,327  | 22.90      | 17.13                        | 18.51         | 41.47        | 0.00       |
| Unemployment rate (%)                                                                            | 4.37    | 4.34       | 5.07                         | 4.20          | 4.01         | 0.00       |
| Households Below Poverty Level (%)                                                               | 11.73   | 23.68      | 15.66                        | 11.10         | 7.45         | 0.00       |
| Median Family Income (43300 - Sherman-Denison, TX MSA)                                           |         | \$71,649   | Median Housing Value         |               |              | \$154,750  |
| Median Family Income (43300 - Sherman-Denison, TX MSA) for 2024                                  |         | \$92,100   | Median Gross Rent            |               |              | \$919      |
|                                                                                                  |         |            | Families Below Poverty Level |               |              | 8.60       |
| 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 populations of the Sherman-Denison MSA AA, as reported through the 2020 U.S. Census, was 135,543 of which 2.5 percent were low-income individuals, and 25.4 percent were moderate-income individuals.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 8.6 percent of families in the Sherman-Denison MSA AA had income below the federal poverty line. According to the 2020 U.S. Census demographic data, households below the poverty level represented 11.7 percent.

The number of housing units in the AA totaled 56,749 at the end of the assessment period. Of the total, 33,648 are owner-occupied, while 15,679 are occupied rental units, and 7,422 units sit vacant, representing 59.3 percent, 27.6 percent, and 13.1 percent of total housing units, respectively. The median housing value of housing units for the Sherman-Denison MSA AA was \$154,750 at the end of the evaluation period.

### Economic Data

According to Moody's Analytics, the Sherman-Denison MSA strengths include being a residential community located in the Dallas-Oklahoma City corridor, strong net migration and population growth,

low business costs, and low employment volatility. Weaknesses include limited availability of high-paying jobs, lower labor force participation compared to Texas and the national average, and shortage of skilled labor. The top five employers in the area are Texoma Healthcare Systems, Tyson Foods, Rulz Foods, Walmart Inc., and Cigna.

According to the Bureau of Labor Statistics (BLS), the non-seasonally adjusted unemployment rate for Grayson County was 4.2 percent in January 2022, and decreased to 3.4 in December 2024. The broader Texas statewide unemployment levels were 4.7 percent and 3.7 percent, respectively, during the same evaluation period.

### *Community Contacts*

As part of the CRA evaluation, we reviewed information from a community contact interviewed during the evaluation period. The interview was with the president of a public, nonprofit organization that focuses on economic development within the AA. The organization develops and implements a comprehensive economic development program. According to the contact, the area has experienced significant growth in population and businesses thanks to its strategic location between Dallas and Oklahoma City, which offers a small-town feel with affordable living. This growth has spurred interest in small business development and attracted national retailers. Major employers in the area include a medical center, a food company, and the local school district. While the area is adapting to this growth, the contact noted a shortage of entry-level homes due to rising real estate prices and a need for small business start-up loans.

### Texas Non-MSA AA

We performed a limited scope review for the Texas Non-MSA AA. As of the 2020 U.S. Census, the Texas Non-MSA AA, included the county of Red River and contained 5 CTs, of which none were low-income, 40 percent were moderate-income, 60 percent were middle-income, and none were upper income. The county does not have any underserved or distressed CTs. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income geographies. The bank operated one full-service branch with a drive-through and a non-deposit taking ATM within this AA. The branch is located in a moderate-income CT. Bank deposits from the Texas Non-MSA AA totaled \$38.6 million, or 30.8 percent of total bank deposits as of June 30, 2024. Approximately 16 percent of the loans originated during the evaluation period were within Texas Non-MSA AA.

According to the FDIC, the bank had 18.1 percent of the deposit market share in the AA as of June 30, 2024. Specifically, the bank ranked third out of five reporting institutions in the AA. The top two banks by deposit market share are Guaranty Bank & Trust, N.A. at 35.4 percent and State Bank of De Kalb at 30.2 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Texas Non-MSA AA.

| Assessment Area(s) - TX Non-MSA                                                                  |        |            |                              |               |              |            |
|--------------------------------------------------------------------------------------------------|--------|------------|------------------------------|---------------|--------------|------------|
| 2022 - 2024                                                                                      |        |            |                              |               |              |            |
| Demographic Characteristics                                                                      | #      | Low % of # | Moderate % of #              | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts)                                                                      | 5      | 0.00       | 40.00                        | 60.00         | 0.00         | 0.00       |
| Population by Geography                                                                          | 11,587 | 0.00       | 37.69                        | 62.31         | 0.00         | 0.00       |
| Housing Units by Geography                                                                       | 6,956  | 0.00       | 38.61                        | 61.39         | 0.00         | 0.00       |
| Owner-Occupied Housing by Geography                                                              | 4,014  | 0.00       | 33.16                        | 66.84         | 0.00         | 0.00       |
| Occupied Rental Units by Geography                                                               | 1,129  | 0.00       | 56.51                        | 43.49         | 0.00         | 0.00       |
| Vacant Units by Geography                                                                        | 1,813  | 0.00       | 39.55                        | 60.45         | 0.00         | 0.00       |
| Businesses by Geography                                                                          | 350    | 0.00       | 37.71                        | 62.29         | 0.00         | 0.00       |
| Farms by Geography                                                                               | 43     | 0.00       | 23.26                        | 76.74         | 0.00         | 0.00       |
| Family Distribution by Income Level                                                              | 3,336  | 27.73      | 19.00                        | 19.81         | 33.45        | 0.00       |
| Household Distribution by Income Level                                                           | 5,143  | 30.35      | 24.75                        | 14.86         | 30.04        | 0.00       |
| Unemployment rate (%)                                                                            | 5.14   | 0.00       | 3.43                         | 6.02          | 0.00         | 0.00       |
| Households Below Poverty Level (%)                                                               | 20.61  | 0.00       | 23.36                        | 18.90         | 0.00         | 0.00       |
| Median Family Income (Non-MSAs - TX)                                                             |        | \$61,809   | Median Housing Value         |               |              | \$97,200   |
| Median Family Income (Non-MSAs - TX) for 2024                                                    |        | \$75,500   | Median Gross Rent            |               |              | \$558      |
|                                                                                                  |        |            | Families Below Poverty Level |               |              | 17.99      |
| 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 populations of the Texas Non-MSA AA, as reported through the 2020 U.S. Census, was 11,587 of which none were low-income individuals and 37.7 percent were moderate-income individuals.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 18 percent of families in the Texas Non-MSA AA had income below the federal poverty line. According to the 2020 U.S. Census demographic data, households below the poverty level represented 20.6 percent, with the number of housing units in the AA representing 6,956 at the end of the assessment period. Of the total, 4,014 are owner-occupied, while 1,129 are occupied rental units, and 1,813 units sit vacant, representing 57.7 percent, 16.2 percent, and 26.1 percent of total housing units, respectively. The median housing value of housing units for the Texas Non-MSA AA was \$97,200 at the end of the evaluation period.

Red River County is mostly a rural geography with most jobs focused on agriculture. A community contact was not completed for the Texas non-MSA AA as this is a limited-scope AA.

## Scope of Evaluation in Texas

As discussed earlier, the Sherman-Denison MSA was selected for a full-scope review. The Texas non-MSA AA received a limited scope review. Refer to the table in Appendix A for a list of all AAs under review.

## LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the Sherman-Denison MSA was adequate.

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

The bank exhibited an adequate geographic distribution of loans Sherman-Denison MSA.

#### *Home Mortgage Loans*

Refer to Table 7a in the state of Texas section of Appendix D for data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. The geographical distribution of home mortgage loans was adequate. The percentage of home mortgage loans originated or purchased in moderate-income geographies was lower than both the percentage of owner-occupied housing units and the aggregate lending to moderate-income geographies. The bank did not make any home mortgage loans in the low-income geography. Low-income CTs presented limited lending opportunities for the bank. There is one low-income and only eight moderate-income census tracts in Grayson County. Given this, less consideration is given to low-income geographies versus moderate income geographies for FNB's performance, in the overall conclusion. FNB also had significant competition, as the bank held less than two percent of the deposit mark share and the peer HMDA market share, for the evaluation period.

#### *Small Businesses Loans*

Refer to Table 9a in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small business loans. The geographic distribution of small business loans reflects poor distribution throughout the AA. The geographic distribution percentage of small business loans in moderate-income geographies was lower than the percentage of business located in moderate-income geographies and somewhat lower than the aggregate lending to businesses located in moderate-income geographies. The bank did not make any small business loans in the low-income geography. As noted above, there is one low-income and only eight moderate-income census tracts in Grayson County. Given this, less consideration is given to low-income geographies versus moderate income geographies for FNB's weaker performance, in the overall conclusion. FNB also had significant competition, as the bank held less than two percent of the deposit mark share and the peer HMDA market share, for the evaluation period.

#### *Lending Gap Analysis*

We did not identify any unexplained conspicuous gaps in any of the areas they reviewed. We reviewed summary reports and maps and analyzed home mortgage lending activity to identify any gaps in the

geographic distribution of loans in all full-scope AA. The geographic distribution of small business loans also shows no unexplained conspicuous gaps.

### **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 of different sizes, given the product lines offered by the bank.

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

Refer to Table 8a in the state of Texas 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 borrower distribution of home mortgage loans was poor. The bank's percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families but exceeded aggregate lending to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly lower than the percentage of moderate-income families and lower than the aggregate lending to moderate-income borrowers.

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

Refer to Table 10a in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small business loans. The distribution of loans to businesses of different sizes was excellent. The bank's percentage of loans to businesses with revenues of \$1 million or less was near the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate lending to small business with gross revenues of \$1 million or less.

### **Responses to Complaints**

FNB did not receive any complaints related to its CRA performance during the evaluation period. This did not have a positive or negative impact on the overall rating.

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

Based on a limited scope review the bank's performance under the Lending Test in the Texas non-MSA was stronger than the bank's overall performance under the Lending Test in the full scope area. The geographical distribution of home mortgage loans and small business loans reflects excellent distribution throughout the AA. The borrower distribution of home mortgage loans was excellent and the distribution of loans to businesses of different sizes was excellent.

## State Rating

### State of Arkansas

**CRA rating for the State of Arkansas<sup>1</sup>:** Satisfactory.

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of home mortgage and small business loans across geographies of different income levels in the state of Arkansas; and
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes in the state of Arkansas.

### Description of Institution's Operations in Arkansas

#### Arkansas Non-MSA AA

The Arkansas non-MSA AA consists of the whole counties of Lafayette and Hempstead. Because the two adjacent counties are not part of an MSA, they are combined into one AA. Lafayette County has three CTs and Hempstead County has six CTs. As of the 2020 U.S. Census, the Arkansas Non-MSA AA contained 10 CTs, of which none were low-income, 20 percent were moderate-income, 60 percent were middle-income, and 20 percent were upper income. The counties do not have any underserved or distressed CTs. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income geographies. The bank operated two full-service branches with drive-throughs and a non-deposit taking ATMs within this AA. Both branches are located in middle-income CTs. Deposits from the Arkansas Non-MSA AA totaled \$40.7 million, or 32.6 percent of total bank deposits as of June 30, 2024. Approximately 41 percent of the loans originated during the evaluation were in the Arkansas Non-MSA AA.

According to the FDIC, the bank had 16.6 percent of the deposit market share in the AA as of June 30, 2024. Specifically, the bank ranked last out of seven reporting institutions in the AA. The top three banks by deposit market share are Farmers Bank & Trust Company, at 33 percent, Cadence Bank at 20.9 percent, and Bodcaw Bank at 16.5 percent. The majority of the geography is rural, and jobs are mainly agricultural.

#### *Economic Data*

According to Moody's Analytics the Arkansas non-MSA AA strengths include low business costs, positive net migration, significant shale natural gas resources and low employment volatility. Weaknesses include low educational attainment, few jobs in tech and knowledge-based industries, high

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

poverty and low per capita income, and low worker productivity. The top five employers in the area are Walmart Inc., Tyson Foods, University for Medical Sciences, Baptist Health, and University of Arkansas.

According to the BLS, the non-seasonally adjusted unemployment rate for Hempstead County was 3.9 percent in January 2022 and decreased to 3.8 in December 2024. According to the BLS, the non-seasonally adjusted unemployment rate for Lafayette County was 4.9 percent in January 2022 and decreased to 4.8 in December 2024.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Arkansas Non-MSA AA.

## Arkansas Non-MSA AA

| Assessment Area(s) - AR Non-MSA                                                                  |        |            |                 |                              |              |            |
|--------------------------------------------------------------------------------------------------|--------|------------|-----------------|------------------------------|--------------|------------|
| 2022 - 2024                                                                                      |        |            |                 |                              |              |            |
| Demographic Characteristics                                                                      | #      | Low % of # | Moderate % of # | Middle % of #                | Upper % of # | NA* % of # |
| Geographies (Census Tracts)                                                                      | 10     | 0.00       | 20.00           | 60.00                        | 20.00        | 0.00       |
| Population by Geography                                                                          | 26,373 | 0.00       | 14.42           | 60.88                        | 24.70        | 0.00       |
| Housing Units by Geography                                                                       | 14,964 | 0.00       | 16.87           | 61.79                        | 21.34        | 0.00       |
| Owner-Occupied Housing by Geography                                                              | 7,813  | 0.00       | 11.97           | 62.36                        | 25.68        | 0.00       |
| Occupied Rental Units by Geography                                                               | 3,185  | 0.00       | 22.04           | 62.20                        | 15.76        | 0.00       |
| Vacant Units by Geography                                                                        | 3,966  | 0.00       | 22.37           | 60.34                        | 17.30        | 0.00       |
| Businesses by Geography                                                                          | 646    | 0.00       | 18.27           | 62.23                        | 19.50        | 0.00       |
| Farms by Geography                                                                               | 89     | 0.00       | 4.49            | 62.92                        | 32.58        | 0.00       |
| Family Distribution by Income Level                                                              | 7,464  | 20.58      | 19.16           | 18.29                        | 41.97        | 0.00       |
| Household Distribution by Income Level                                                           | 10,998 | 23.20      | 18.47           | 14.31                        | 44.03        | 0.00       |
| Unemployment rate (%)                                                                            | 5.94   | 0.00       | 9.84            | 6.09                         | 3.71         | 0.00       |
| Households Below Poverty Level (%)                                                               | 20.19  | 0.00       | 35.19           | 18.81                        | 14.15        | 0.00       |
| Median Family Income (Non-MSAs - AR)                                                             |        | \$53,596   |                 | Median Housing Value         |              | \$79,000   |
| Median Family Income (Non-MSAs - AR) for 2024                                                    |        | \$64,800   |                 | Median Gross Rent            |              | \$673      |
|                                                                                                  |        |            |                 | Families Below Poverty Level |              | 15.41      |
| 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 populations of the Arkansas non-MSA AA, as reported through the 2020 U.S. Census, was 26,373 of which none were low-income individuals and 20 percent were moderate-income individuals.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 15.4 percent of families in the Arkansas Non-MSA AA had income below the federal poverty line. According to the 2020 U.S. Census demographic data, households below the poverty level represented 20.2 percent.

The number of housing units in the AA totaled 14,964 at the end of the assessment period. Of the total, 7,813 are owner-occupied, while 3,185 are occupied rental units, and 3,966 units sit vacant, representing 52.2 percent, 21.3 percent, and 26.5 percent of total housing units, respectively. The median housing value of housing units for the Arkansas Non-MSA AA was \$79,000 at the end of the evaluation period.

### *Community Contacts*

We reviewed two community contacts from each county to determine a community profile, identify opportunities for participation by local financial institutions, and determine the performance of local financial institutions in meeting the credit needs of the community. The community contacts for the Arkansas non-MSA are a regional multi-county development and planning agency under a public policy board of directors that provides expertise and services to counties, cities, businesses, industry, and residents. One of the contacts was an executive director who represented a planning and development organization, devoted to administrative support for project planning, grant writing, economic, and workforce development initiatives in the southwest region of Arkansas with funding through Union County local government. The contact stated the overall economic condition of the area is declining due to less industry jobs. The area was decreasing in population because of the loss of jobs. The contact considered the lack of affordable housing and jobs to be the most pressing concerns in the area and stated consumer residential loans are the biggest credit need in the area.

The second contact indicated there was inadequate supply of affordable housing but there were community development projects in place to help resolve this issue. Additionally, while all banks in the area are involved in the community, the smaller local institutions were noticeably more supportive in reinvesting compared to the larger banks in the area with national footprints.

### **Scope of Evaluation in Arkansas**

As discussed earlier, the Arkansas non-MSA AA was selected for a full-scope review. Refer to the table in Appendix A for a 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 Arkansas non-MSA AA 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 7b 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 geographical distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate lending to moderate-income geographies. There were no low-income census tracts for the Arkansas Non-MSA AA.

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

Refer to Table 9b 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 business loans. The geographic distribution of small business loans reflects poor distribution throughout the AA. The percentage of small business loans in moderate-income geographies was lower than the percentage of businesses in those geographies and the aggregate lending. There were no low-income census tracts in the Arkansas Non-MSA AA.

### ***Lending Gap Analysis***

We did not identify any unexplained conspicuous gaps in any of the areas they reviewed. The OCC reviewed summary reports and maps and analyzed home mortgage lending activity to identify any gaps in the geographic distribution of loans in all full-scope AA.

### **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.

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

Refer to Table 8b 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 borrower distribution of home mortgage loans was reasonable. The bank's percentage of home mortgage loans to low-income borrowers was somewhat lower than the percentage of low-income families but exceeded aggregate lending to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers was near the percentage of moderate-income families but exceeded the aggregate lending to moderate-income borrowers.

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

Refer to Table 10b in the state of Arkansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small business loans. The distribution of loans to businesses of different sizes was excellent. The bank's percentage of loans to businesses with revenues of \$1 million or less exceeded the percentage of businesses with gross annual revenues of \$1 million or less and the aggregate lending to small businesses.

### **Responses to Complaints**

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

## Appendix A: Scope of Examination

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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>                            | 1/1/2022 – 12/31/2024            |                                       |
| <b>Bank Products Reviewed:</b>                          | Home mortgage<br>Small business) |                                       |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>    | <b>Products Reviewed</b>              |
| None                                                    |                                  |                                       |
| <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>Texas</b>                                            |                                  |                                       |
| Sherman-Denison MSA                                     | Full scope                       | Grayson County                        |
| Texas Non-MSA AA                                        | Limited scope                    | Red River County                      |
| <b>Arkansas</b>                                         |                                  |                                       |
| Arkansas Non-MSA AA                                     | Full scope                       | Lafayette County and Hempstead County |

## Appendix B: Summary of State Ratings

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| RATINGS                                    |                     |
|--------------------------------------------|---------------------|
| Overall Bank:                              | Lending Test Rating |
| <b>The First National Bank of Tom Bean</b> | Satisfactory        |
| State:                                     |                     |
| <b>Texas</b>                               | Satisfactory        |
| <b>Arkansas</b>                            | Satisfactory        |
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## 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 7a: 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 |
| Sherman - Denison MSA                                                                                                                   | 62                        | 19,126        | 86.11             | 14,715         | 2.05                              | 0.0          | 0.97        | 20.72                             | 8.06         | 20.83        | 52.55                             | 45.16        | 43.11        | 24.67                             | 46.77        | 35.10        | --                                | --           | --          |
| TX Non-MSA                                                                                                                              | 10                        | 968           | 13.89             | 441            | --                                | 0.0          | --          | 33.16                             | 50.00        | 27.89        | 66.84                             | 50.00        | 72.11        | --                                | --           | --           | --                                | --           | --          |
| <b>Total</b>                                                                                                                            | <b>72</b>                 | <b>20,094</b> | <b>100.00</b>     | <b>15,156</b>  | <b>1.83</b>                       | <b>0.0</b>   | <b>0.94</b> | <b>22.05</b>                      | <b>13.89</b> | <b>21.03</b> | <b>54.08</b>                      | <b>45.83</b> | <b>43.95</b> | <b>22.04</b>                      | <b>40.28</b> | <b>34.08</b> | <b>--</b>                         | <b>--</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 8a: 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  |
| Sherman - Denison MSA                                                                                                                   | 62                        | 19,126        | 86.11             | 14,715         | 20.33                | 17.74        | 3.59        | 18.99                     | 1.61         | 10.36        | 20.98                   | 14.52        | 17.27        | 39.70                  | 53.23        | 44.15        | --                             | 12.90        | 24.61        |
| TX Non-MSA                                                                                                                              | 10                        | 968           | 13.89             | 441            | 27.73                | 20.00        | 8.39        | 19.00                     | 50.00        | 16.55        | 19.81                   | --           | 22.90        | 33.45                  | 30.00        | 30.61        | --                             | --           | 21.54        |
| <b>Total</b>                                                                                                                            | <b>72</b>                 | <b>20,094</b> | <b>100.00</b>     | <b>15,156</b>  | <b>20.99</b>         | <b>18.06</b> | <b>3.73</b> | <b>18.99</b>              | <b>8.33</b>  | <b>10.54</b> | <b>20.88</b>            | <b>12.50</b> | <b>17.44</b> | <b>39.14</b>           | <b>50.00</b> | <b>43.76</b> | <b>--</b>                      | <b>11.11</b> | <b>24.52</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 9a: 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 |
| Sherman - Denison MSA                                                                                                                                                            | 20                              | 1,647        | 50.0              | 9,486          | 6.75              | 0.0          | 4.41        | 22.23                  | 10.0         | 18.14        | 45.96                | 50.0         | 45.33        | 25.05               | 40.0         | 32.12        | --                          | --           | --          |
| TX Non-MSA                                                                                                                                                                       | 20                              | 1,575        | 50.00             | 563            | --                | 0.0          | --          | 37.71                  | 45.0         | 34.10        | 62.29                | 55.0         | 65.90        | --                  | 0.0          | --           | --                          | --           | --          |
| <b>Total</b>                                                                                                                                                                     | <b>40</b>                       | <b>3,222</b> | <b>100.0</b>      | <b>10,049</b>  | <b>6.31</b>       | <b>0.0</b>   | <b>4.16</b> | <b>23.24</b>           | <b>27.5</b>  | <b>19.04</b> | <b>47.03</b>         | <b>52.5</b>  | <b>46.48</b> | <b>23.41</b>        | <b>20.0</b>  | <b>30.32</b> | <b>--</b>                   | <b>--</b>    | <b>--</b>   |
| Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available. |                                 |              |                   |                |                   |              |             |                        |              |              |                      |              |              |                     |              |              |                             |              |             |
| Due to rounding, totals may not equal 100.0%                                                                                                                                     |                                 |              |                   |                |                   |              |             |                        |              |              |                      |              |              |                     |              |              |                             |              |             |

| Table 10a: 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 |
| Sherman - Denison MSA                                                                         | 201,642                         |    | 50.0              | 9,486          | 85.80                           | 80.0         | 51.90        | 3.36                           | 20.0         | 10.85                                  | --           |
| TX Non-MSA                                                                                    | 201,575                         |    | 50.0              | 563            | 82.00                           | 80.0         | 54.35        | 2.86                           | 20.0         | 15.14                                  | --           |
| <b>Total</b>                                                                                  | <b>403,217</b>                  |    | <b>100.00</b>     | <b>10,049</b>  | <b>85.55</b>                    | <b>80.0</b>  | <b>52.04</b> | <b>3.32</b>                    | <b>20.0</b>  | <b>11.13</b>                           | <b>--</b>    |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

| Table 7b: 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 |
| AR Non-MSA                                                                                        | 596,183                   |    | 100.00            | 982            | --                                | --           | --          | 11.97                             | 16.95        | 10.29        | 62.36                             | 55.93        | 65.58        | 25.68                             | 27.12        | 24.13        | --                                | --           | --          |
| <b>Total</b>                                                                                      | <b>596,183</b>            |    | <b>100.00</b>     | <b>982</b>     | <b>--</b>                         | <b>--</b>    | <b>--</b>   | <b>11.97</b>                      | <b>16.95</b> | <b>10.29</b> | <b>62.36</b>                      | <b>55.93</b> | <b>65.58</b> | <b>25.68</b>                      | <b>27.12</b> | <b>24.13</b> | <b>--</b>                         | <b>--</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 8b: 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  |
| AR Non-MSA                                                                                       | 596,183                   |    | 100.00            | 982            | 20.58                | 13.56        | 7.43        | 19.16                     | 18.64        | 16.90        | 18.29                   | 28.81        | 22.61        | 41.97                  | 38.98        | 35.85        | --                             | --           | 17.21        |
| <b>Total</b>                                                                                     | <b>596,183</b>            |    | <b>100.00</b>     | <b>982</b>     | <b>20.58</b>         | <b>13.56</b> | <b>7.43</b> | <b>19.16</b>              | <b>18.64</b> | <b>16.90</b> | <b>18.29</b>            | <b>28.81</b> | <b>22.61</b> | <b>41.97</b>           | <b>38.98</b> | <b>35.85</b> | <b>--</b>                      | <b>--</b>    | <b>17.21</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 9b: 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 |  |  |
| AR Non-MSA                                                                                                                                                                                                                       | 20                              | 1,569 | 100.00            | 1,576          | --                | 0.0          | --          | 18.27                  | 5.0          | 16.18       | 62.23                | 45.0         | 54.76       | 19.50               | 50.0         | 29.06       | --                          | --           | --          |  |  |
| Total                                                                                                                                                                                                                            | 20                              | 1,569 | 100.00            | 1,576          | --                | 0.0          | --          | 18.27                  | 5.0          | 16.18       | 62.23                | 45.0         | 54.76       | 19.50               | 50.0         | 29.06       | --                          | --           | --          |  |  |
| Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                                 |       |                   |                |                   |              |             |                        |              |             |                      |              |             |                     |              |             |                             |              |             |  |  |

| Table 10b: 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 |  |
| AR Non-MSA                                                                                                                                                                                                                       | 20                              | 1,569 | 100.00            | 1,576          | 75.85                           | 90.0         | 61.93       | 4.02                           | 10.0         | 20.12                                  | --           |  |
| Total                                                                                                                                                                                                                            | 20                              | 1,569 | 100.00            | 1,576          | 75.85                           | 90.0         | 61.93       | 4.02                           | 10.0         | 20.12                                  | --           |  |
| Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                                 |       |                   |                |                                 |              |             |                                |              |                                        |              |  |