



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

April 27, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank of Louisiana
Charter Number: 705339

1135 Lake Shore Dr.
Lake Charles, LA 70601-5243

Office of the Comptroller of the Currency

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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 **Outstanding**.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on a more than reasonable loan-to-deposit ratio (LTD), a significant majority of loans being made in the assessment area (AA), a reasonable geographic distribution of loans, a reasonable loan distribution to borrowers of different income levels, and no CRA-related complaints being filed during the review period.
- The Community Development (CD) Test rating is based on excellent responsiveness to community development lending and services, and adequate responsiveness to community development investments.

Loan-to-Deposit Ratio

Considering the size and financial condition of First Federal Bank of Louisiana (First Federal) and the credit needs of the AA, the LTD ratio was more than reasonable. The quarterly average LTD ratio for First Federal Bank during the evaluation period was 65.8 percent. Since the prior evaluation, First Federal's quarterly LTD had ranged from a low of 62.3 percent in the 2nd quarter of 2023 to a high of 68.2 percent in the third quarter of 2024. The quarterly average LTD ratio for similarly situated financial institutions included below and located within or near the AA was 64.5 percent.

Lending in Assessment Area

A substantial majority of First Federal's loans were inside its AAs.

The bank originated and purchased approximately 89.5 percent by dollar and 85.3 percent by number of its total loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2023 - 2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	424	89.45	50	10.55	474	97,068	85.25	16,793	14.75	113,861
Total	424	89.45	50	10.55	474	97,068	85.25	16,793	14.75	113,861
Source: 1/1/2023 - 12/31/2025 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

First Federal is a \$1.1 billion full-service federally chartered, mutual savings association headquartered in Lake Charles, Louisiana. Management currently operates with 16 branches in five parishes, with the main branch being in Lake Charles, Louisiana, which is the parish seat of Calcasieu Parish. Calcasieu Parish is part of the Lake Charles Metropolitan Statistical Area (MSA). In addition to the main branch, there are another eight branches and 14 ATMs located in Calcasieu Parish. Management operates an additional three branches and five ATMs in Rapides Parish, which is in central Louisiana and is part of the Alexandria MSA. The remaining four branches and four ATMs are in the non-MSA parishes of Beauregard, Allen, and Natchitoches. There were no open or closed branches during the review period.

As of December 31, 2025, total assets were \$1.1 billion with total loans of \$659.7 million. Total deposits were \$976 million and Tier 1 capital was 12.2 percent. First Federal is primarily a residential mortgage lender offering conventional fixed-rate and adjustable-rate mortgage loans for the purposes of construction, purchase, refinance, or home improvement of one- to four-family dwellings. First Federal services portfolio loans as well as loans sold to Fannie Mae. Management also offers a wide variety of traditional loan products to serve the diverse needs of its communities as well as Small Business Administration, conventional, and U.S. Government sponsored (FHA, VA, and Rural Housing Development) mortgages originated and sold in the secondary market. There are no legal, financial, or other factors impeding First Federal's ability to meet the credit needs in its AAs. First Federal's CRA performance was previously evaluated on April 10, 2023, with an overall rating of "Satisfactory."

First Federal maintains an in-house First-Time Homebuyer Program featuring lower down payments and reduced closing costs. During the review period, five loans totaling \$966,856 were originated. Management additionally offers the Home Ownership Promotes Empowerment loan program, which provides flexible underwriting guidelines for low- and moderate-income (LMI) applicants who would otherwise not qualify for loans under standard underwriting guidelines. During the review period, First Federal serviced four of these loans totaling \$232,664. Lastly, First Federal participates in the Federal Home Loan Bank of Dallas's HELP program, which offers up to \$20,000 for down payment and closing cost assistance to LMI borrowers. First Federal originated one HELP loan during the review period.

Banking hours reasonably meet community needs with lobby hours Monday through Friday and extended Friday hours, drive-thru banking, and ATMs at all branch locations, except for one branch located in Calcasieu Parish, located in a middle-income census tract (CT), which does not offer drive-thru banking. Management also operates with six off-site ATMs throughout its AAs. In addition to branch and ATM services, First Federal offers access to non-proprietary ATMs on Visa networks or at Accel locations, 24-hour online banking, 24/7 interactive voice response system, and mobile banking. First Federal offers a wide range of deposit and loan products, and no significant differences exist between locations. First Federal does offer some deposit products that are targeted to LMI borrowers including:

- Home Buyers Savings Account—Targeted to first-time homebuyers and encourages saving for the down payment on a home. Free budget counseling is available, and discounts, such as

a reduction in origination fees, reduction in cost of in-house appraisals, and waiver of document preparation fees, are offered.

- Smart Access Checking—Bank On Certified account intended to help underserved and underbanked populations in the community by providing low-cost banking services to those that might normally not be able to open a traditional checking account.
- Community Organization Checking—Available to nonprofit, civic, check groups, or other similar organizations.
- Individual Development Accounts (IDA)—Available in Calcasieu Parish to participants of Asset Builders of Southwest Louisiana (Asset Builders). Asset Builders is a collaborative between the Calcasieu Parish Police Jury, Project Build a Future, Lake Charles North Redevelopment Authority, Southwest Louisiana Entrepreneurial and Economic Development (SEED) Center, United Way of Southwest Louisiana, and the Calcasieu Parish Public Trust Authority that provides eligible participants with a matched savings program. First-time homebuyers participating in the program receive a 4-to-1 match, up to \$4,000, that can be used towards the purchase of their first home. Small business owners participating in Asset Builder’s Small Business Capitalization Program receive an 8-to-1 match, up to \$4,000, that is to be used towards their business plan, which is developed during their time in the program.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the CRA performance of First Federal using the Interagency Intermediate-Small Bank CRA procedures, which focus on an analysis of First Federal’s primary loan products as well as community development (CD) activities. The evaluation period primarily covered January 1, 2023, through December 31, 2025. Conclusions regarding First Federal’s lending performance are based on a review of residential real estate loans. These loans represent all loans reported on the HMDA loan application register for 2023, 2024, and 2025. CD activities include qualifying loans, investments, and services covering 2022, 2023, 2024, and 2025. CD activities had an extended review period as those activities conducted in 2022 were not analyzed in the prior performance evaluation and so were included in this evaluation.

Selection of Areas for Full-Scope Review

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

First Federal operates in three AAs including the Lake Charles MSA AA, Alexandria MSA AA, and the Non-MSA AA, all within the state of Louisiana. The Lake Charles MSA AA includes Calcasieu Parish. The Alexandria MSA AA includes Rapides Parish. The Non-MSA AA includes Allen, Beauregard, and Natchitoches Parishes.

We conducted a full-scope review of the Lake Charles MSA AA and limited-scope reviews of both the Alexandria MSA AA and Non-MSA AA. The Lake Charles MSA AA received a full scope review as 56.3 percent of the branches and approximately 66.5 percent of the deposits were in the Lake Charles AA.

Ratings

First Federal's overall rating is a blend of the state ratings, with an emphasis on the full-scope AA (Lake Charles MSA AA) being reviewed. Community development (CD) activity including loans, investments, and services were also a component of the overall rating.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Louisiana

CRA rating for the State of Louisiana: Satisfactory.

The Lending Test is rated: Satisfactory.

The CD Test is rated: Outstanding.

The major factors that support this rating include:

- A reasonable geographic distribution of loans in the state,
- A reasonable distribution of loans to individuals of different income levels given the demographics in the AA,
- An excellent level of CD lending and services and an adequate level of CD investments, and
- No CRA-related complaints.

Description of Institution's Operations in Louisiana

Lake Charles MSA AA

First Federal operates nine branches, including the bank's main office, and 14 ATMs in Calcasieu Parish, which is part of the Lake Charles MSA AA. As of 2025, the MSA included Calcasieu Parish, Cameron Parish, and Jefferson Davis Parish, but management determined the entire MSA would be too large to serve and so exclusively focused their activities on Calcasieu Parish, where their branches and ATMs are located. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding LMI areas.

The AA is in the southwestern corner of the state of Louisiana and borders Texas to the west. Lake Charles is the principal city in Calcasieu Parish. The main office, one branch location, and four ATMs are in moderate-income CTs, with the remaining branch locations and ATMs either in middle- or upper-income CTs. There are 56 CTs in this AA, including eight low-income (14.3 percent); nine moderate-income (16.1 percent); 19 middle-income (33.9 percent); 18 upper-income (32.1 percent); and two NA CTs without income data (3.6 percent). A CT can be NA if it was part of a parish at one time, but due to map changes, is no longer in that particular parish.

First Federal is well positioned in the AA, which includes both state and federal banks, credit unions, and mortgage banking companies with regional and national footprints, for deposits. Based on the most recent Deposit Market Share Report, First Federal ranked third out of 18 institutions in its AA, commanding 12.6 percent of market share. The two largest competitors hold 31.9 percent of the deposit market, evidencing only slight competition for the bank in the AA.

HMDA aggregate data for 2024 revealed that First Federal ranked 18th out of 219 financial institutions making loans in the AA, with a market share of 1.4 percent. The top five lenders in the AA achieved a combined market share of 22.8 percent, evidencing significant competition in the AA for mortgage loans.

The following table depicts income categories:

Income Categories – Lake Charles MSA AA			
Low	Moderate	Middle	Upper
<\$45,150	\$45,150 to <\$72,240	\$72,240 to <\$108,360	≥\$108,360

The HUD-adjusted MSA median family income for the AA in 2023-2025 was \$90,300. Using First Federal's current underwriting ratios and based on a slightly higher median family income of \$91,100, a low-income borrower would qualify for a maximum loan amount of \$144,750 while a moderate-income borrower would qualify for a maximum loan of \$250,900. While census data reports the median home price in the AA to be \$152,700, the average sales price in the AA during the review period was significantly higher. Based on data obtained from nationally recognized real estate websites, the average sales price for a residence in the AA in 2025 was \$217,404, which was a decrease from the average sales price of \$259,183 in January 2023. Instability with interest rates, coupled with housing supply and housing demand, impacted the average sales price in the AA during the review period.

Additionally, we considered the average age of the housing stock in the AA, which according to the 2024 U.S. Census was 40 years. Older housing often has higher maintenance costs compared to new housing stock and frequently requires significant updates to bring the dwelling up to code. These older houses are often less energy efficient, resulting in higher utility costs and overall homeownership costs. Additionally, home insurance costs increased significantly during the review period. Based on this information, low-income borrowers, and some moderate-income borrowers, would potentially not be able to purchase a home in the AA, even assuming the borrower had no additional debt.

Low-income families earning a median family income less than \$45,150 represented 23.1 percent of families in the AA, while moderate-income families comprised 16.5 percent of the AA population. In 2023-2025, 15.8 percent of households in the AA earned wages below the poverty level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the eight low-income and nine moderate-income CTs in the AA. Of the 91,644 housing units within the AA, only 10.4 percent are in the low-income CTs and only 17.1 percent are in the moderate-income CTs. These percentages are reduced further when just focusing on owner-occupied housing units, with there being only 6.3 percent in low-income CTs and 16.2 percent in moderate-income CTs.

Assessment Area – Lake Charles MSA AA						
2023 - 2025						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	56	14.29	16.07	33.93	32.14	3.57
Population by Geography	216,785	9.98	14.79	40.14	35.09	0.00
Housing Units by Geography	91,644	10.43	17.13	38.67	33.77	0.00
Owner-Occupied Housing by Geography	53,713	6.28	16.15	37.54	40.03	0.00
Occupied Rental Units by Geography	24,714	17.90	18.30	40.39	23.41	0.00
Vacant Units by Geography	13,217	13.30	18.93	40.07	27.70	0.00
Businesses by Geography	8,806	7.79	17.11	39.37	35.46	0.26
Farms by Geography	377	6.37	13.53	36.34	43.77	0.00
Family Distribution by Income Level	51,720	23.05	16.52	17.81	42.62	0.00
Household Distribution by Income Level	78,427	25.15	15.07	16.75	43.03	0.00
Unemployment rate (%)	5.84	11.53	3.92	7.28	3.91	0.00
Households Below Poverty Level (%)	15.82	34.96	18.47	14.76	10.26	0.00
Median Family Income (29340 - Lake Charles, LA MSA)		\$64,803	Median Housing Value			\$152,700
Median Family Income (29340 - Lake Charles, LA MSA) for 2025		\$90,300	Median Gross Rent			\$803
			Families Below Poverty Level			13.02
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2025 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 economy of the Lake Charles MSA AA is diverse, with gaming, healthcare services, oil refining, chemical manufacturing, and industrial construction as major economic drivers. Major employers in the AA include the Calcasieu Parish School Board (education), Lake Charles Memorial Health System (medical), Westlake Chemical Corporation (manufacturing), L'Auberge and Golden Nugget (gaming), and Sun Industrial Group (contractor). According to the Bureau of Labor Statistics, the Lake Charles MSA AA had a 4.6 percent unemployment rate in January 2025, which was identical to the Louisiana state average.

In conjunction with this examination, we conducted an interview with two community contacts in the AA. The primary needs in the community were identified as financial literacy, affordable housing (including rental housing), and small business lending. Both agreed area banks are attempting to meet the community needs in the AA.

Scope of Evaluation in Louisiana

First Federal operates in three AAs in the state of Louisiana including the Lake Charles MSA AA, Alexandria MSA AA, and the Non-MSA AA. The Lake Charles MSA AA received a full-scope review while the Alexandria MSA AA and the Non-MSA AA received a limited-scope review. We analyzed First Federal's HMDA lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

First Federal's performance under the Lending Test in Louisiana is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

First Federal exhibited a reasonable geographic distribution of loans in the state.

Home Mortgage Loans

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

First Federal's geographic distribution of loans is reasonable. The percentage of loans was slightly below the percentage of owner-occupied housing units in both LMI CTs. However, the percentage of loans in low-income CTs exceeded aggregate lending in low-income CTs and on par with aggregate lending in moderate-income CTs, demonstrating reasonable performance in these CTs.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

First Federal exhibited a reasonable distribution of loans to individuals of different income levels given the product lines offered.

Home Mortgage Loans

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

First Federal's distribution of loans to individuals of different income levels was reasonable. While the percentage of loans was less than both the percentage of LMI borrowers and aggregate lending to both LMI borrowers, the lending was reasonable after considering performance context.

With low-income borrowers qualifying for a maximum loan of \$144,750 and the average sales price in the AA being between \$217,404-\$259,183, home ownership was not affordable for low-income borrowers in the AA during the review period.

Moderate-income borrowers faced similar challenges, qualifying for a maximum loan of \$250,900. When also factoring in the additional cost of taxes and the rising cost of insurance, coupled with the

average age of home in the AA, at 40 years, these added challenges create more barriers for homeownership for moderate-income borrowers in the AA.

Responses to Complaints

Management did not receive any CRA-related complaints during the review period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, performance under the Lending Test in the Alexandria MSA AA and Non-MSA AA was consistent with overall performance under the Lending Test in the full-scope area. It should be noted that there were no low-income CTs in the Non-MSA AA during the review period.

COMMUNITY DEVELOPMENT TEST

First Federal's performance under the CD Test in the state of Louisiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, First Federal exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering First Federal's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of CD Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total
Lake Charles MSA AA	14	87.5	12,917	87.6
Alexanderia MSA AA	1	6.3	75	0.5
Non-MSA AA	0	0.0	0	0.0
Broader, Statewide, or Regional	1	6.3	1,755	11.9
Total	16	100.0	14,748	100.0

Source: Bank data; *May not total 100% due to rounding.

During the evaluation period, management made 16 qualifying CD loans totaling approximately \$14.7 million in the state-wide AAs. In the Lake Charles MSA AA, management's qualifying CD loans totaled \$12.9 million, representing approximately 14.1 percent of allocated tier one capital. In the Alexanderia MSA AA, management's qualifying CD loans totaled approximately \$75,000, representing less than one percent of allocated tier one capital. First Federal did not make any CD loan in the Non-MSA AA.

Based on a full-scope review, First Federal's qualified CD loans in the Lake Charles MSA AA exhibited excellent responsiveness to CD lending needs when considering First Federal's performance context, capacity, and the stated needs of the AAs. Many of First Federal's CD loans involved affordable housing, a stated need in the AA. First Federal's CD lending rating had an overall positive impact on First Federal's overall CD rating.

In addition to First Federal's CD lending in its AAs, management also made one CD loan in the broader area totaling \$1.7 million that benefited LMI geographies and that also focused on affordable housing. This additional CD loan made outside First Federal's AA had a positive impact on First Federal's overall CD rating.

The following are examples of CD loans First Federal originated or purchased in the full-scope AA:

- Three loans totaling \$459,000 provided affordable housing, which is a known need in the AA.
- One loan totaling approximately \$1 million was made to a non-profit organization that provided direct services to LMI families in the AA. These services included basic school supplies to school-aged children in need, a food pantry that provides food distribution and personal care items to residents as well as transients in emergency situations, and an education, resource, and assistance center that assists families in need by helping to pay for housing or utilities.
- Five loans totaling \$9.5 million were made to a local restaurant that helped revitalize and stabilize the Lake Charles lake front. The loan supported the Lakefront Development Revitalization Plans of the Lake Charles area, which continues to recover from the long-term effects of Hurricanes Laura and Delta.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lake Charles MSA AA	0	0	99	1,039	99	53.2	1,039	12.5	0	0
Alexandria MSA AA	0	0	33	1,307	33	17.7	1,307	15.7	0	0
Non-MSA AA	2	5,130	50	557	52	27.9	5,687	68.2		
Broader, Statewide, or Regional	0		2	302	2	1.1	302	3.6		
Total	2	5,130	184	3,205	186	100	8,335	100	0	0

During the evaluation period, First Federal made 186 investments totaling approximately \$8.3 million in the state-wide AAs. In the Lake Charles MSA AA, management's qualifying CD investments, donations, and grants totaled approximately \$1 million, representing 1.1 percent of allocated tier 1 capital, in the Alexandria MSA AA management's qualifying investments and donations totaled approximately \$1.3 million, representing approximately 4.1 percent of allocated tier 1 capital, and in the Non-MSA AA management's qualifying CD investments, donations, and grants totaled approximately \$5.7 million, representing 37.4 percent of allocated tier 1 capital.

Based on a full-scope review, First Federal qualified CD investments in the Lake Charles MSA AA exhibited poor responsiveness to CD investments needs when considering First Federal's performance context, capacity, and the stated needs of the AAs. When also factoring the limited-scope areas of

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

review, First Federal's CD investment rating had an overall positive impact on First Federal's overall rating.

In addition to First Federal CD investments in its AA, management also made two CD investments in the broader area that benefited LMI persons and geographies. These two investments totaled approximately \$300,000 and had a positive impact on First Federal's overall CD rating.

The following are examples of qualified investments and grants in the full-scope AA:

- First Federal purchased a mortgage-backed security totaling approximately \$92,000 targeting affordable housing in moderate-income geographies, a known need in the AA.
- First Federal sponsored grants totaling \$337,402 from the Federal Home Loan Bank of Dallas. These grants allowed a local non-profit and a pro-bono law center to apply jointly for the Heirs' Property Program grant, which allowed the law center to work with applicants to clear title on their homes; provided general educational training on clearing heirship issues, will/succession documents, general title issues; and provide down payment and closing cost assistance to a moderate-income, first time homebuyer, allowing him and his family the opportunity to make the transition from being a renter to becoming a homeowner.

Extent to Which the Bank Provides Community Development Services

First Federal provided an excellent level of CD services that was responsive to the needs of the community in the Lake Charles MSA AA. CD services focused primarily on community service and economic development in the AA and were targeted at LMI individuals. Bank employees participated in a variety of organizations and partnerships, some in leadership roles, that benefited LMI individuals and promoted economic development. First Federal employees also provided technical assistance on financial- and banking-related matters to community groups and to LMI persons and families.

During the review period, 16 employees provided approximately 532 community service hours to 26 different qualifying organizations in the Lake Charles MSA AA; three employees provided approximately 29 community service hours to four organizations in the Alexandria MSA AA; and two employees provided approximately 986 community service hours to five organizations in the Non-MSA AA. These activities helped provide affordable housing, a noted need in the AA, as well as services related to community services and economic development. Noteworthy examples of organizations where bank employees provided CD services include:

- Five bank employees provided 21 volunteer hours to prospective first-time homebuyers in the full-scope AA. Bank employees discussed the advantages and disadvantages of buying versus renting a home, the basics of banking and the importance of building a relationship with a financial institution. They also discussed ways to rebuild credit, how to budget, the application process, different loan programs available, assistance programs available for LMI individuals and first-time homebuyers, how to shop for the best loan, and what to expect at closing.
- Two bank employees provided four volunteer hours to Bank On Southwest Louisiana, which is a collaboration between financial institutions, community-based organizations, and local government, to ensure that all residents have the opportunity to be financially healthy. Together, these groups work to connect people to safe, affordable, and certified banking accounts.
- Two bank employees served as board members for the West Calcasieu Chamber of Commerce, volunteering 50 combined hours, where they provided their financial expertise to the organization.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, First Federal's performance under the CD Test in the Alexandria MSA AA was consistent with the overall performance under the CD Test in the full-scope area. While the CD loan performance in the Alexandria MSA AA was weaker than its CD loan performance in the full-scope AA, its performance in the CD investment test was stronger in the Alexandria MSA AA than in the CD investment performance in the full-scope AA. The CD service performance was consistent with the full-scope AA. Based on limited-scope reviews, First Federal's performance under the CD Test in the Non-MSA AA was consistent with overall performance under the CD Test in the full scope area. While First Federal did not make any CD loans in the Non-MSA AA during the review period, First Federal made significantly more CD investments in the Non-MSA AA when compared to the full-scope AA. The CD service performance was consistent with the full-scope AA.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2023-12/31/2025	
Bank Products Reviewed:	Home mortgage CD loans, Qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Louisiana		
Lake Charles MSA AA	Full-scope	
Alexandria MSA AA	Limited-scope	
Non-MSA AA	Limited-scope	

Appendix B: Summary of State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Federal Bank of Louisiana	Outstanding	Outstanding	Outstanding
Louisiana	Satisfactory	Outstanding	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI 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 LMI 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 CT delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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

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

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

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

Median Family Income: 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 parishes that represent an

employment center or centers, plus adjacent parishes associated with the main/secondary parish or parishes through commuting ties.

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

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

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

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

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2025
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
Lake Charles MSA AA	326	82,710	76.89	6,894	6.28	4.60	3.41	16.15	13.19	13.19	37.54	37.73	42.78	40.03	44.48	40.60	--	--	--
Non-MSA AA	43	5,532	10.14	2,757	--	--	--	12.01	9.30	7.44	33.38	34.88	34.31	54.39	55.81	58.14	0.22	--	0.11
Alexandria MSA AA	55	8,826	12.97	4,273	3.11	3.64	1.31	18.67	12.73	14.07	34.66	23.64	36.67	43.56	60.00	47.84	--	--	0.02
Total	424	97,068	100.00	13,924	3.97	4.01	2.09	15.95	12.74	12.32	35.79	35.61	39.23	44.23	47.64	46.29	0.05	--	0.03
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023 - 2025
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
Lake Charles MSA AA	326	82,710	76.89	6,894	23.05	3.68	5.40	16.52	6.75	14.61	17.81	12.27	18.42	42.62	46.32	31.00	--	30.98	30.58
Non-MSA AA	43	5,532	10.14	2,757	19.02	2.33	3.19	14.21	9.30	7.65	17.98	6.98	16.29	48.79	74.42	48.64	--	6.98	24.23
Alexandria MSA AA	55	8,826	12.97	4,273	22.58	1.82	4.49	16.99	3.64	11.40	18.19	7.27	17.08	42.23	25.45	36.44	--	61.82	30.59
Total	424	97,068	100.00	13,924	22.05	3.30	4.68	16.17	6.60	12.25	17.96	11.08	17.59	43.82	46.46	36.16	--	32.55	29.32
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			