



PUBLIC DISCLOSURE

December 1, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank
Charter Number: 10004

200 West Court Street
Paragould, AR 72450

Office of the Comptroller of the Currency

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

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

Contents

Overall CRA Rating	1
Description of Institution	2
Scope of the Evaluation	2
Discriminatory or Other Illegal Credit Practices Review	4
State Rating.....	5
State of Arkansas	5
State Rating.....	21
State of Tennessee	21
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of First National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is primarily based on performance in the Arkansas rating area, with weight given to the bank’s primary markets and sources of deposits. The excellent geographic distribution of loans in its Assessment Areas (AAs), good distribution to borrowers of different income levels, and excellent levels of community development (CD) lending were considered in arriving at the Arkansas Lending Test rating. In addition, the bank performed similarly or better in geographic and borrower distribution the state of Tennessee, with adequate levels of CD lending.
- The Investment Test rating is primarily based on the performance in the Arkansas rating area. The bank had a good level of qualified CD investments in its largest AA and excellent levels of qualified CD investments in its remaining AAs in Arkansas. The bank had a good level of qualified CD investments in Tennessee.
- The Service Test rating is primarily based on the performance in the Arkansas rating area. Branch distribution in AAs was adequate and CD services were adequate. The bank performed similarly in the state of Tennessee.

Lending in Assessment Area

A substantial majority of the bank’s loans were in its AAs.

The bank originated and purchased 81.73 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	941	76.32	292	23.68	1,233	200,145	64.96	107,956	35.04	308,101
Small Business	2,028	85.50	344	14.50	2,372	206,934	81.46	47,095	18.54	254,029
Small Farm	555	78.50	152	21.50	707	79,655	78.85	21,366	21.15	101,021
Total	3,524	81.73	788	18.27	4,312	486,734	73.40	176,417	26.60	663,151

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

Description of Institution

First National Bank (FNB, or the bank) is a \$2.5 billion interstate bank headquartered in Paragould, AR, with locations in both Arkansas and Tennessee. FNB is a wholly owned subsidiary of First Paragould Bankshares, Inc. FNB is originally based out of northeast Arkansas in Paragould, AR established in 1889 and nationally chartered in 1903. FNB now operates in three Arkansas markets: northeast Arkansas, northwest Arkansas, and central Arkansas. The bank entered the Jonesboro Metropolitan Statistical Area (MSA) AA in 1998, the Fayetteville-Springdale-Rogers MSA AA in 2014, and the Little Rock-North Little Rock-Conway MSA AA in in 2018. FNB introduced a Tennessee market in September 2021 via acquisition of Citizens Bank in Hartsville, TN. There has been no acquisition or merger activity since the Citizens Bank acquisition.

The bank's presence in the northeastern part of Arkansas includes Clay and Greene Counties in the Arkansas Non-MSA AA and Craighead County in the Jonesboro MSA AA. The bank's presence in the northwestern part of Arkansas includes Benton and Washington Counties in the Fayetteville-Springdale-Rogers MSA AA. The bank's presence in the central part of Arkansas is in Cleburne County in the Arkansas Non-MSA AA and Pulaski County in the Little Rock-North Little Rock-Conway MSA AA. The bank's presence in Tennessee is in Sumner and Trousdale Counties in the Nashville-Davidson-Murfreesboro-Franklin MSA AA.

As of December 31, 2024, FNB had gross loans totaling \$2.0 million or 79.9 percent of total assets. The bank's loan product offerings include home purchase, home refinance, home improvement, agricultural, commercial, small business, and consumer loans. Lending offerings are consistent through the bank's markets, though Northeast Arkansas is the main region for agricultural lending.

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs in its AAs. FNB received an overall rating of "Satisfactory" at the last CRA evaluation dated September 12, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assessed the bank's performance under the Large Bank CRA procedures, which includes the Lending Test, Investment Test, and Service Test. The evaluation period is January 1, 2022, through December 31, 2024. The Lending Test evaluates the bank's record of meeting credit needs of the bank's AAs through its lending activities. The Investment Test evaluates the bank's

record of meeting CD needs through investments, grants, and donations. The Service Test evaluates the bank's record of meeting banking and CD needs through branch operations and service hours.

In evaluating the bank's lending performance, the OCC analyzed home mortgage loans the bank reported on its Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) from 2022, 2023, and 2024 and 2022, 2023, and 2024 HMDA aggregate data. For small loans made to businesses and small loans to farms, the OCC analyzed the bank reported loans under the CRA and 2022 and 2023 CRA aggregate data. At the time of the evaluation, 2024 CRA aggregate data was unavailable. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. In addition, the OCC considered the bank's business focus and proportion of originations during the evaluation period. For this evaluation the OCC considered home mortgages and small loans made to businesses as primary loan products for all assessment areas. In addition, the OCC considered small loans to farms as primary products within the bank's northeast Arkansas (Arkansas non-MSA and Jonesboro, AR MSA AAs) and Tennessee (Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA) markets.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, the 2022 through 2024 data was analyzed and aggregated. The distribution of bank branches is compared to U.S. Census 2020 and 2024 official annual estimates.

We also evaluated retail services, qualified investments, and CD services from January 1, 2022, through December 31, 2024. Responsiveness and innovation were evaluated compared to community needs as identified by interviews with community contacts.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area, 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 section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, with emphasis given to the state of Arkansas given volume and length of operations. Emphasis is given to the Lending Test and towards the bank's primary products within each AA. Given the bank's deposit sources, highest emphasis was given towards the Arkansas Non-MSA AA for the State of Arkansas rating. Given the bank's lending and business focus, highest emphasis was given towards small loans to businesses for the Lending Test.

The state ratings in rating areas with a single AA are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank's or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Arkansas

CRA rating for the State of Arkansas: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes in its AA.
- The bank was a leader in making CD loans, which had a positive impact on the lending test rating.
- The institution had an excellent level of qualified CD investments and grants and exhibited good responsiveness to credit and community development needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Arkansas

Arkansas represented the bank's most significant AAs in terms of both deposits and lending. The bank operated in four AAs within Arkansas: the Arkansas non-MSA AA, the Jonesboro, AR MSA AA, the Fayetteville-Springdale-Rogers, AR MSA AA, and the Little Rock-North Little Rock-Conway, AR MSA AA. The assessment areas were split into three separate markets, with the Arkansas non-MSA AA included in two different markets. The bank operated in northeast Arkansas via the Arkansas non-MSA and Jonesboro, AR MSA AAs, northwest Arkansas via the Fayetteville-Springdale-Rogers, AR MSA AA, and central Arkansas via the Arkansas non-MSA and Little Rock-North Little Rock-Conway, AR MSA AAs.

The Arkansas non-MSA AA consisted of all whole census tracts (CTs) within Clay, Cleburne, and Greene Counties. There was a total of 27 CTs within this AA. The bank's main office was situated within this AA. The bank offered all lending and deposit products within this AA, including serving agricultural customers centered in Clay and Greene Counties. Greene County represented the bank's strongest market by share, driven by a history of more than 125 years within the market. Greene County was one of two growing areas in northeast Arkansas and the bank had participated in growth in both commercial and residential sectors.

The Jonesboro, AR MSA AA consisted of all whole CTs within Craighead County and did not include Poinsett County. Exclusions of CTs within the MSA were made as no branches are established in the Poinsett County. There was a total of 22 CTs within this AA. This AA is the closest MSA to the bank’s main office. The bank offered all lending and deposit products within this AA. This AA had higher bank saturation compared to the bank’s primary AA but presented a growing sector for the bank through a growing housing market within the AA.

According to June 30, 2024, Federal Deposit Insurance Corporation (FDIC) deposit market share reports, FNB had a 1.7 percent market share in Arkansas, making it the 12th largest deposit holder out of 136 financial institutions in the state. The bank had a significant presence in northeast Arkansas and this market represented approximately 50.5 percent of gross loans and 68.6 percent of total deposits. The bank had a modest presence in central Arkansas and northwest Arkansas. Central Arkansas represented approximately 14.0 percent of gross loans and 13.7 percent of total deposits and northwest Arkansas represented approximately 18.9 percent of gross loans and 4.2 percent of total deposits.

The bank operated 20 full-service branches in the state of Arkansas. All branches provided a full range of products and services, including drive-up facilities. All locations were equipped with an ATM and there were two stand-alone ATMs. There were no deposit-taking ATMs.

Arkansas non-MSA AA

The following table provides a summary of demographics, housing, and business information for the AA.

Assessment Area – Arkansas Non-MSA 2024						
						2022 – 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.00	14.81	55.56	25.93	3.70
Population by Geography	84,999	0.00	14.75	53.00	31.15	1.10
Housing Units by Geography	43,352	0.00	13.82	54.77	29.86	1.54
Owner-Occupied Housing by Geography	24,638	0.00	11.02	54.84	32.71	1.42
Occupied Rental Units by Geography	10,307	0.00	21.91	51.96	25.73	0.40
Vacant Units by Geography	8,407	0.00	12.12	58.00	26.58	3.29
Businesses by Geography	2,097	0.00	15.55	54.03	29.33	1.10
Farms by Geography	247	0.00	11.74	58.30	29.55	0.40
Family Distribution by Income Level	24,056	17.43	19.65	21.55	41.38	0.00
Household Distribution by Income Level	34,945	21.24	14.55	18.47	45.74	0.00
Unemployment rate (%)	6.52	0.00	7.45	5.99	7.10	0.00
Households Below Poverty Level (%)	16.84	0.00	27.76	16.79	11.17	35.55
Median Family Income (Non-MSAs – AR)		\$53,596			Median Housing Value	\$114,600
Median Family Income (Non-MSAs – AR) for 2024		\$64,800			Median Gross Rent	\$705
					Families Below Poverty Level	13.07

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

According to the most recently available Census data, the non-MSA AA consists of 27 CTs, of which four are moderate-income. There are no low-income CTs in the AA. In 2024, three CTs within Clay County were identified as distressed due to poverty.

The leading industries within the AA are manufacturing, healthcare, retail trade, education, and construction. Based on American Community Survey (ACS) 5-year estimates employment has slightly declined within the AA, below employment growth compared to statewide statistics. Unemployment is

6.5 percent, well above the statewide unemployment rate of 3.6 percent as of December 2024. Banking competition is modest within the AA.

Community Contact

The OCC relied on information from three community contacts in the AA that were conducted after the evaluation period. The contacts included an organization that provides community services to LMI persons, an organization that provides affordable housing, and an organization that provides funding for small businesses and community-wide infrastructure.

The community contacts indicated the following needs and opportunities in the bank’s AA:

- Financing to support multifamily rental housing preservation, rehabilitation, and development.
- Financing to support health services for low or moderate income (LMI) individuals.
- Essential community-wide infrastructure financing.
- Loans for small businesses and farms.
- Utility payment assistance for LMI individuals.

Jonesboro, AR MSA AA

The following table provides a summary of demographics, housing, and business information for the AA.

Assessment Area – Jonesboro, AR MSA 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	2022 – 2024	
					Upper % of #	NA* % of #
Geographies (Census Tracts)	22	4.55	22.73	40.91	31.82	0.00
Population by Geography	111,231	5.50	22.03	39.26	33.21	0.00
Housing Units by Geography	46,156	4.66	22.62	41.61	31.11	0.00
Owner-Occupied Housing by Geography	24,055	0.50	16.68	39.21	43.60	0.00
Occupied Rental Units by Geography	18,148	8.97	28.85	45.18	17.00	0.00
Vacant Units by Geography	3,953	10.25	30.15	39.79	19.81	0.00
Businesses by Geography	3,466	2.57	26.14	38.06	33.24	0.00
Farms by Geography	283	1.06	24.03	36.40	38.52	0.00
Family Distribution by Income Level	27,829	20.74	15.89	19.53	43.84	0.00
Household Distribution by Income Level	42,203	22.69	16.91	16.62	43.78	0.00
Unemployment rate (%)	5.82	14.49	7.41	6.82	2.60	0.00
Households Below Poverty Level (%)	16.36	43.71	28.11	15.42	6.06	0.00
Median Family Income (27860 – Jonesboro, AR MSA)		\$60,922			Median Housing Value	\$143,100
Median Family Income (27860 – Jonesboro, AR MSA) for 2024		\$82,700			Median Gross Rent	\$800
					Families Below Poverty Level	12.18
FFIEC File – 2020 Census FFIEC File – 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

According to the most recently available Census data, the Jonesboro, AR MSA AA consists of 22 CTs, of which one is low-income and five are moderate-income.

The leading industries within the AA are healthcare, retail trade, manufacturing, education, and construction. Based on ACS 5-year estimates employment has slightly declined within the AA, below employment growth compared to statewide statistics. Unemployment is 5.8 percent, well above the statewide unemployment rate of 3.6 percent as of December 2024. Banking competition is high in the AA.

Community Contact

The OCC relied on information from two community contacts in the AA that were conducted during and after the evaluation period. The contacts represented an economic development organization and an organization that provides community services to LMI individuals.

The community contacts indicated the following as needs and opportunities in the bank’s AA:

- Financing to support multifamily rental housing preservation, rehabilitation, and development.
- Financing to support health services for LMI individuals.
- Essential community-wide infrastructure financing.

Fayetteville-Springdale-Rogers, AR MSA AA

Assessment Area – Fayetteville-Springdale-Rogers, AR MSA 2024						
						2022 – 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	9.46	27.03	43.24	18.92	1.35
Population by Geography	358,965	8.41	25.07	43.11	22.55	0.87
Housing Units by Geography	136,673	8.10	25.01	43.24	22.47	1.18
Owner-Occupied Housing by Geography	67,859	2.17	21.11	49.35	27.02	0.36
Occupied Rental Units by Geography	60,285	15.07	29.26	35.97	17.66	2.05
Vacant Units by Geography	8,529	6.09	26.09	45.97	20.34	1.51
Businesses by Geography	11,615	5.05	22.72	40.62	28.49	3.13
Farms by Geography	473	2.96	22.41	49.68	24.10	0.85
Family Distribution by Income Level	83,385	22.67	19.40	18.98	38.95	0.00
Household Distribution by Income Level	128,144	25.08	17.48	19.07	38.37	0.00
Unemployment rate (%)	3.77	4.55	5.29	3.22	2.78	7.84
Households Below Poverty Level (%)	14.26	30.06	19.02	11.59	6.28	54.71
Median Family Income (22220 – Fayetteville-Springdale-Rogers, AR MSA)		\$75,899			Median Housing Value	\$165,500
Median Family Income (22220 – Fayetteville-Springdale-Rogers, AR MSA) for 2024		\$94,400			Median Gross Rent	\$843
					Families Below Poverty Level	10.01
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						

According to the most recently available Census data, the Fayetteville-Springdale-Rogers, AR MSA AA consists of 74 CTs, of which seven are low-income and 20 are moderate-income.

The leading industries within the AA are retail trade, healthcare, manufacturing, education, and construction. Based on ACS 5-year estimates employment has increased within the AA and is above employment growth compared to statewide statistics. Unemployment is 3.8 percent, slightly above the statewide unemployment rate of 3.6 percent as of December 2024.

Community Contact

The OCC relied on information from three community contacts in the AA that were conducted during the evaluation period. The contacts represented an economic development organization and organizations that work in affordable housing. The community contacts indicated the following as needs and opportunities in the bank’s AA:

- Financing for affordable housing development.
- Loans and investment in affordable housing funds.
- Access to credit for small businesses, including microloans.
- Access to credit for LMI consumers.

Little Rock-North Little Rock-Conway, AR MSA AA

Assessment Area – Little Rock-North Little Rock-Conway, AR MSA 2024						
						2022 – 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	107	13.08	27.10	32.71	25.23	1.87
Population by Geography	399,125	10.12	27.11	33.17	29.46	0.14
Housing Units by Geography	185,460	11.17	26.58	33.30	28.94	0.00
Owner-Occupied Housing by Geography	93,882	6.05	21.81	35.21	36.92	0.00
Occupied Rental Units by Geography	67,770	15.61	31.86	30.77	21.76	0.00
Vacant Units by Geography	23,808	18.74	30.34	32.98	17.94	0.00
Businesses by Geography	18,954	8.05	23.96	29.20	38.30	0.49
Farms by Geography	586	6.66	23.72	28.16	41.30	0.17
Family Distribution by Income Level	95,195	25.23	15.75	18.54	40.49	0.00
Household Distribution by Income Level	161,652	26.10	17.35	16.39	40.16	0.00
Unemployment rate (%)	4.91	10.57	6.41	4.58	2.52	37.14
Households Below Poverty Level (%)	15.12	38.72	17.78	13.63	6.70	0.00
Median Family Income (STATE XX)		\$72,289			Median Housing Value	\$142,300
Median Family Income (STATE XX) for 20XX		\$86,400			Median Gross Rent	\$847
					Families Below Poverty Level	11.96
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						

According to the most recently available Census data, the Little Rock-North Little Rock-Conway, AR MSA AA consists of 107 CTs, of which 14 are low-income and 29 are moderate-income.

The leading industries within the AA are healthcare, retail trade, education, public administration, and professional services. Based on ACS 5-year estimates employment has increased within the AA and is above employment growth compared to statewide statistics. Unemployment is 4.9 percent, above the statewide unemployment rate of 3.6 percent as of December 2024.

Community Contact

The OCC relied on information from two community contacts in the AA that was conducted during the evaluation period. The contacts represented an organization that provides housing to LMI individuals and an economic development organization. The community contacts indicated the following as needs and opportunities in the bank’s AA:

- Land donations for affordable housing development.
- Down payment assistance for LMI homebuyers.
- Access to credit for small businesses.

Scope of Evaluation in Arkansas

The Arkansas Non-MSA and Jonesboro, AR MSA AAs were selected for full-scope reviews. The Fayetteville-Springdale-Rogers, AR MSA and Little-Rock-North Little Rock-Conway, AR MSA AAs were selected for limited scope reviews.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

The bank’s performance under the Lending Test in Arkansas is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank’s performance in the Arkansas Non-MSA and Jonesboro, AR MSA AAs was excellent.

Lending Activity

Lending levels reflected good responsiveness to AAs credit needs.

Table 3: Lending Activity*								2022 – 2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Arkansas Non-MSA 2024	455	801	415	22	0	1,693	55.20	63.51	
Jonesboro, AR MSA 2024	272	682	67	9	0	1,030	33.58	20.36	
Fayetteville-Springdale-Rogers, AR MSA 2024	66	78	0	10	0	154	5.02	4.82	
Little Rock-North Little Rock-Conway, AR MSA 2024	41	142	0	7	0	190	6.19	11.31	
Total	834	1,703	482	48	0	3,067	100.00	100.00	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Arkansas Non-MSA 2024	65,641	77,475	64,180	29,190	0	236,486	45.83	63.51	
Jonesboro, AR MSA 2024	51,917	64,928	11,172	19,586	0	147,603	28.61	20.36	
Fayetteville-Springdale-Rogers, AR MSA 2024	29,074	16,527	0	28,226	0	73,827	14.31	4.82	
Little Rock-North Little Rock-Conway, AR MSA 2024	20,882	23,470	0	13,691	0	58,043	11.25	11.31	
Total	167,514	182,400	75,352	90,693	0	519,959	100.00	100.00	
Source: 1/1/2022 - 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Arkansas Non-MSA AA

Based on the June 30, 2024, FDIC Summary of Deposits Market Share Report, the bank ranked first out of 15 FDIC-insured depository institutions with a 43.6 percent deposit market share. The second and third ranked institutions held 8.7 and 7.3 percent market share, respectively.

Based on 2024 home mortgage lending data, the bank ranked second out of the reporting institutions with a market share of 5.7 percent by number of loans and 4.5 percent by dollar volume. The leading institution made up 6.5 percent by number of loans and 7.0 percent by dollar volume. The third ranking institution made up 5.1 percent by number of loans and 4.8 percent by dollar volume. The bank ranks in the first percentile of home mortgage lenders in the market and is consistent with their deposit market share in the AA given high competition from non-depository entities.

Based on 2023 CRA data for small loans to businesses, the bank ranked first out of the reporting institutions with a market share of 16.4 percent by number of loans and 33.5 percent by dollar volume. The second ranked institution made up 14.4 percent by number and 3.8 percent by dollar volume, while the third ranked institution made up 11.8 percent by number and 0.9 percent by dollar volume. The bank's leading position in small loans to businesses is consistent with their deposit market share in the AA.

Based on 2023 CRA data for small loans to farms, the bank ranked first out of the reporting institutions with a market share of 34.7 percent by number of loans and 53.1 percent by dollar volume. The second ranked institution made up 18.9 percent by number of loans and 2.2 percent by dollar volume, while the third ranked institution made up 11.4 percent by number and 15.5 percent by dollar volume. The bank's leading position in small loans to farms is consistent with their deposit market share in the AA.

Jonesboro, AR MSA AA

Based on the June 30, 2024, FDIC Summary of Deposits Market Share Report, the bank ranked fourth out of 25 FDIC-insured depository institutions with an 8.1 percent deposit market share. The first, second, and third ranked institutions held 19.0 percent, 10.3 percent, and 9.1 percent, respectively.

Based on 2024 home mortgage lending data, the bank ranked ninth out of the reporting institutions with a market share of 2.6 percent by number of loans and 2.5 percent by dollar volume. The first ranked institution made up 6.6 percent by number and 6.6 percent by dollar volume. The second ranked institution made up 5.2 percent by number and 5.6 percent by dollar volume. The third ranked institution made up 3.6 percent by number and 3.3 percent by dollar volume. The bank's home mortgage lending is consistent with their deposit market share in the AA given high competition from non-depository entities.

Based on 2023 CRA data for small loans to businesses, the bank ranked third out of the reporting institutions with a market share of 7.8 percent by number of loans and 14.1 percent by dollar volume. The first ranked institution made up 18.8 percent by number and 4.4 percent by dollar volume. The second ranked institution made up 8.6 percent by number and 2.2 percent by dollar volume. The bank's position in small loans to businesses is consistent with their deposit market share in the AA.

Based on 2023 CRA data for small loans to farms, the bank ranked fourth out of the reporting institutions with a market share of 4.8 percent by number of loans and 9.1 percent by dollar volume. The first ranked institution made up 26.4 percent by number and 35.3 percent by dollar volume. The second ranked institution made up 24.4 percent by number and 2.6 percent by dollar volume. The third ranked institution made up 14.2 percent by number and 23.6 percent by dollar value. The bank's position in small loans to farms is consistent with their deposit market share in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

Arkansas Non-MSA AA

The bank's geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

There are no low-income CTs in the AA.

Jonesboro, AR MSA AA

The bank's geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Based on the data in the tables, the overall geographic distribution of small loans to businesses was good.

Arkansas Non-MSA AA

The bank's geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses in moderate-income geographies exceeded the percentages of businesses and the aggregate percentage of all reporting lenders.

There are no low-income CTs in the AA.

Jonesboro, AR MSA AA

The bank's geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses in low-income geographies was below the percentage of the businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Farms

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

The geographic distribution of small loans to farms was excellent.

Arkansas Non-MSA AA

The bank's geographic distribution of small loans to farms was excellent.

The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms located in those geographies and the aggregate percentage of all reporting lenders.

There are no low-income CTs in the AA.

Jonesboro, AR MSA AA

The bank's geographic distribution of small loans to farms was excellent.

The percentage of small loans to farms in low-income geographies was below the percentage of farms located in these geographies and near to the aggregate percentage of all reporting lenders. The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed home mortgage, small business, and small farm lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in the full-scope areas reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Based on the data in the tables, the overall borrower distribution of home mortgage loans was adequate.

Arkansas Non-MSA AA

The bank's borrower distribution of home mortgage loans was adequate.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was well below the percentage of those families and was near to the aggregate percentage of all reporting lenders.

Jonesboro, AR MSA AA

The bank's borrower distribution of home mortgage loans was adequate.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was well below the percentage of those families and was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

Arkansas Non-MSA AA

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Jonesboro, AR MSA AA

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Small Loans to Farms

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

Based on the data in the tables, the overall borrower distribution of small loans to farms was good.

Arkansas Non-MSA AA

The percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Jonesboro, AR MSA AA

The percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Arkansas Non-MSA AA

The level of CD lending in the AR Non-MSA AA was excellent. The bank made 22 CD loans totaling \$29 million, which represented 20.7 percent of allocated tier 1 capital. By dollar volume, 98.4 percent of the loans were for economic development and 1.6 percent funded revitalization and stabilization efforts.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank made a \$2 million loan that supported economic development, allowing for 18 low – and moderate – income jobs to be retained.
- The bank made four loans totaling \$475,250 that supported revitalization and stabilization of a moderate – income area within the AA.

Jonesboro, AR MSA AA

The level of CD lending in the Jonesboro MSA AA was excellent. The bank made nine CD loans totaling \$19.6 million, which represented 43.34 percent of allocated tier 1 capital. By dollar volume, one percent of the loans was for affordable housing, 60.9 percent funded economic development and 38.1 percent funded community service efforts.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank made a \$5 million loan that supported community service, providing funding to bring broadband to rural areas.
- The bank made a \$195,621 loan funded 22 units of affordable housing.
- The bank made a \$2.8 million loan that provided for the renovation of a medical facility in a moderate – income census tract.

Broader Statewide Area

The bank made 10 loans providing \$35 million in community development loans in the broader statewide area that included one or more of the AAs. The loans did not have a purpose, mandate, or function to serve an AA. These loans supported economic development, community service, and revitalization and stabilization efforts. These loans were given positive consideration and supported the bank’s overall performance under the Lending Test in the state of Arkansas.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Arkansas section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Fayetteville-Springdale-Rogers, AR MSA and Little Rock-North Little Rock-Conway, AR MSA AAs was weaker than the bank’s overall performance under the Lending Test in the full-scope areas; however, the bank does not hold a significant market share within these AA and generally lends consistent with their presence in the market. Weaker performance was driven by weaker borrower income distributions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Arkansas is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Arkansas Non-MSA AA was good and the Jonesboro, AR MSA AA was excellent.

The institution had an excellent level of qualified CD investments and grants. The institution exhibited good responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Arkansas Non-MSA AA	15	\$4,068	63	\$2,252	78	44.57%	\$6,320	30.95%	0	\$0
Jonesboro, AR MSA AA	8	\$1,861	37	\$2,253	45	25.71%	\$4,114	20.15%	0	\$0
Fayetteville-Springdale-Rogers, AR MSA AA	3	\$899	8	\$2,215	11	6.29%	\$3,114	15.25%		
Little Rock MSA	17	\$4,557	24	\$2,316	41	23.43%	\$6,873	33.66%	0	\$0
Total	43	\$11,385	132	\$9036	175	100.00%	\$20,421	100.00%	0	\$0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Arkansas Non-MSA AA

The institution has a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Investment opportunities are limited, and competition investments is significant. Despite these challenges, FNB has been successful in purchasing school bonds and other municipal instruments for CD.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives. Qualified investments and grants primarily supported needs for community services and revitalization or stabilization of LMI geographies.

Qualified investments total \$6.3 million, which includes prior period investments, current period investments, and qualified grants. Investments benefiting the AA during the evaluation represented 4.5 percent of allocated capital. The institution did not have any unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA.

The following are examples of qualified grants in the AA:

- Two grants totaling \$10,100 to a nonprofit that serves LMI individuals. The organization's mission is to provide housing, food, and resources for homeless and sick individuals.
- Two grants totaling \$15,500 to a foundation that serves schools in which the majority of students qualify for free or reduced lunch. This foundation provides donations in support of classroom projects, clubs, groups and organizations.
- Six grants totaling \$10,802 to a school district in which the majority of the students qualify for free or reduced lunch. These donations help the school be able to provide for LMI students in activities and provide school supplies to those who otherwise could not afford them.

Jonesboro, AR MSA AA

The institution had an excellent level of qualified CD investments and donations, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Investment opportunities are limited with the small number of investment instruments available. Competition for investments is significant. Despite these challenges, FNB has been successful in purchasing school bonds and water/sewer bonds as they become available.

The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives. Qualified investments and grants primarily support needs for community services and revitalization or stabilization of LMI geographies.

Qualified investments total \$4.1 million, which includes prior period investments, current period investments, and qualified grants. Investments benefiting the AA during the evaluation represented 9.1

percent of allocated capital. The institution did not have any unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$1.9 million in four school bonds benefitting school districts within the AA in which a majority of students participate in a free or reduced lunch program.

Examples of qualified grants in this AA include:

- Four grants totaling \$7,500 to a low-income tract neighborhood association that serves LMI individuals. The organization’s mission is to help provide resources to help break the cycle of poverty by providing education opportunities.
- Six grants totaling \$19,000 to organizations dedicated to providing healthcare to LMI individuals.
- Three grants totaling \$950 to organizations that serves LMI individuals. These organizations provide hunger relief to people in need by securing resources and distributing food.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Fayetteville-Springdale-Rogers, AR MSA and Little Rock-North Little Rock-Conway, AR MSA AAs was stronger than the bank’s overall performance under the Investment Test in the full-scope areas. In general, the level of qualified CD activities was highly significant relative to market presence and had a positive impact on the rating.

SERVICE TEST

The bank’s performance under the Service Test in Arkansas is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Arkansas Non-MSA and Jonesboro, AR MSA AAs was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution’s AA.

Assessment Area	Deposits		Branches					Population						
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Arkansas Non-MSA AA	63.51	6	30.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	14.75	53.00	31.15	1.10
Jonesboro, AR MSA AA	20.36	3	15.00	0.00	33.33	33.33	33.33	0.00	5.50	22.03	39.26	33.21	0.00	

Fayetteville-Springdale-Rogers, AR MSA AA	4.82	5	25.00	0.00	20.00	0.00	80.00	0.00	8.41	25.07	43.11	22.55	0.87
Little Rock-North Little Rock-Conway, AR MSA AA	11.31	6	30.00	0.00	33.33	0.00	66.77	0.00	10.12	27.11	33.17	29.46	0.14

Source: FFIEC File – 2020, 2024 Census

1/1/202 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank did not open or close any branches during the evaluation period.

The geographic distribution of branches shows higher accessibility to LMI geographies within the Jonesboro, AR MSA AA. The bank has branches located in middle- or upper-income tracts with close proximity to LMI geographies in all AAs.

Arkansas branch lobby hours are all open from at least 8:00 a.m. to 5:00 p.m. Monday through Friday at all locations. One central Arkansas and seven northeast Arkansas branch lobbies open from 8:00 a.m. to 12:00 p.m. on Saturdays.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals.

Community Development Services

Arkansas Non-MSA AA

The institution provided an adequate level of CD services.

During the evaluation period, 47 employees from various lines of business partnered with seven organizations and contributed a total of 531 hours supporting LMI individuals and families. This included serving on committees and boards of two organizations that promote community service and economic development.

Examples of CD services in the AA include:

- A vice president served on the board of an organization that provides small business technical assistance. The employee provided 156 service hours during the evaluation period.
- Nine employees assisted in fund raising for a nonprofit organization that operates a soup kitchen during the evaluation period. The employees provided 29 service hours during the evaluation period.
- Seven employees assisted in fund raising for a battered women’s center that provides emergency shelter. The employees provided 26 service hours during the evaluation period.

Jonesboro, AR MSA AA

The institution provided an adequate level of CD services.

During the evaluation period, 15 employees from various lines of business partnered with three organizations and contributed 114 hours supporting LMI individuals and families. This included serving on committees and boards of two organizations that promote community service and economic development.

Examples of CD services in the AA include:

- A market president served on the board as treasurer of an organization that provides financial literacy education and grants to organizations serving LMI persons and geographies. The banker provided 18 service hours during the evaluation period.
- A mortgage president serves on the board of an organization that provides affordable housing. The employee provided 12 service hours during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fayetteville-Springdale-Rogers, AR and Little Rock-North Little Rock-Conway, AR MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope areas.

State Rating

State of Tennessee

CRA rating for the State of Tennessee: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes in its AA.
- The bank made an adequate level of CD loans.
- The institution had a significant level of qualified CD investments and grants and exhibited good responsiveness to credit and community development needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Tennessee

Tennessee represented the bank's newest AAs and was the bank's second largest market by region and third largest by AA. The bank operated in one AA within Tennessee, the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA.

The Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA consisted of all whole CTs within Trousdale County, select CTs within Sumner County, and did not include Davidson, Rutherford, Williamson, Wilson, Maury, Robertson, Dickson, Cheatham, Macon, Hickman, Smith, and Cannon Counties. Exclusions of CTs within the MSA were made due to low proximity of branches to certain CTs within Sumner County and no branches established in the remainder of the MSA. There was a total of 29 CTs within this AA. The bank offered all lending and deposit products within this AA, including serving agricultural customers centered in Trousdale County.

According to June 30, 2024, FDIC deposit market share reports, FNB had a 0.1 percent market share in Tennessee, making it the 96th largest deposit holder out of 173 financial institutions in the state. Lending within state makes up a modest portion of total lending, representing approximately 16.6 percent of gross loans.

The bank operated three full-service branches in the state of Tennessee. All branches provided a full range of products and services, including drive-up facilities. All locations were equipped with an ATM and there was one stand-alone ATM. There were no deposit-taking ATMs.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

Assessment Area – Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	3.45	24.14	44.83	27.59	0.00
Population by Geography	156,464	4.62	19.33	43.92	32.13	0.00
Housing Units by Geography	57,472	5.04	18.81	46.39	29.76	0.00
Owner-Occupied Housing by Geography	38,898	2.37	17.67	44.97	34.99	0.00
Occupied Rental Units by Geography	14,820	10.86	22.96	49.16	17.02	0.00
Vacant Units by Geography	3,754	9.75	14.22	50.16	25.87	0.00
Businesses by Geography	5,551	3.33	18.01	43.85	34.80	0.00
Farms by Geography	206	1.94	24.27	42.23	31.55	0.00
Family Distribution by Income Level	38,573	17.84	17.02	22.68	42.46	0.00
Household Distribution by Income Level	53,718	20.10	16.05	19.43	44.42	0.00
Unemployment rate (%)	3.44	1.76	3.45	4.90	1.42	0.00
Households Below Poverty Level (%)	9.23	35.47	14.22	7.14	5.15	0.00
Median Family Income (34980 – Nashville-Davidson-Murfreesboro-Franklin, TN MSA)		\$81,652			Median Housing Value	\$239,900
Median Family Income (34980 – Nashville-Davidson-Murfreesboro-Franklin, TN MSA) for 2024		\$101,700			Median Gross Rent	\$1,161
					Families Below Poverty Level	7.35
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						

According to the most recently available Census data, the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA consists of 29 CTs, of which one is low-income and seven are moderate-income.

The leading industries within the AA are healthcare, retail trade, manufacturing, construction, and education. Based on ACS 5-year estimates employment has increased within the AA, consistent with employment growth compared to statewide statistics. Unemployment is 3.4 percent, slightly below the statewide unemployment rate of 3.7 percent as of December 2024.

Community Contact

The OCC relied on information from six community contacts in the AA that were conducted during and after the evaluation period. The contacts represented economic development organizations, an organization that provides affordable housing finance, and an organization that provides community services for LMI individuals. The community contacts indicated the following as needs and opportunities in the bank’s AA:

- Financial literacy for small businesses.
- Financial literacy for LMI homebuyers.
- Access to credit for small businesses.
- Financing for multifamily and single-family affordable housing.
- Access to credit for LMI consumers, including small dollar loans.

Scope of Evaluation in Tennessee

The Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA was selected for a full-scope review.

Refer to the table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank’s performance under the Lending Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	107	325	73	1	0	506	100.00	0.00
Total	107	325	73	1	0	506	100.00	0.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	32,630	24,534	4,303	1,250	0	62,717	100.00	0.00
Total	32,630	24,534	4,303	1,250	0	61,717	100.00	0.00

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

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2024, FDIC Summary of Deposits Market Share Report, the bank ranked 37th out of 65 FDIC-insured depository institutions with a 0.3 percent deposit market share. The first, second, and third ranked institutions held 21.2 percent, 13.9 percent, and 11.0 percent, respectively.

Based on 2024 home mortgage lending data, the bank ranked 41st out of the reporting institutions with a market share of 0.7 percent by number of loans and 0.6 percent by dollar volume. The first ranked institution made up 5.9 percent by number and 6.6 percent by dollar volume. The second ranked institution made up 5.3 percent by number and 5.7 percent by dollar volume. The third ranked institution made up 4.7 percent by number and 4.1 percent by dollar volume. The bank’s home mortgage lending is consistent with their deposit market share in the AA.

Based on 2023 CRA data for small loans to businesses, the bank ranked ninth out of the reporting institutions with a market share of 2.4 percent by number of loans and 5.2 percent by dollar volume. The first ranked institution made up 21.7 percent by number and 9.2 percent by dollar volume. The second ranked institution made up 20.5 percent by number and 6.9 percent by dollar volume. The third ranked institution made up 8.5 percent by number and 1.0 percent by dollar volume. The bank's position in small loans to businesses exceeded their deposit market share in the AA.

Based on 2023 CRA data for small loans to farms, the bank ranked first out of the reporting institutions with a market share of 27.0 percent by number of loans and 44.7 percent by dollar volume. The second ranked institution made up 16.0 percent by number and 27.7 percent by dollar volume. The third ranked institution made up 15.0 percent by number and 4.0 percent by dollar value. The bank's position in small loans to farms exceeded their deposit market share in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the state of Tennessee 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The bank's geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The bank's geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting

institutions. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in those geographies and the aggregate percentage of all reporting institutions.

Small Loans to Farms

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

The geographic distribution of small loans to farms was good.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The bank's geographic distribution of small loans to farms was excellent.

The bank did not make any loans in low-income CTs. The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms located in those geographies and was near to the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed home mortgage, small business, and small farm lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. The OCC did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Tennessee 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.

Based on the data in the tables, the overall borrower distribution of home mortgage loans was good.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The bank's borrower distribution of home mortgage loans was good.

The percentage of home mortgage loans to low-income borrowers was below the percentage of those families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to the percentage of those families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was excellent.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Small Loans to Farms

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

Based on the data in the tables, the overall borrower distribution of small loans to farms was excellent.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with revenues of \$1 million or less and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution made an adequate level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The level of CD lending in the AR Non-MSA AA was adequate. The bank made one CD loan totaling \$1.25 million, which represented 3.57 percent of allocated tier 1 capital. By dollar volume, 100 percent of loans funded economic development.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank made a \$1.2 million loan that funded the expansion of a small business in a moderate – income census tract.

Broader Statewide Area

The bank made five loans providing \$13 million in community development loans in the broader statewide area that included one or more of the AAs. The loans did not have a purpose, mandate, or function to serve an AA. These loans supported economic development and revitalization and stabilization efforts. These

loans were given positive consideration and supported the bank’s overall performance under the Lending Test in the state of Arkansas.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank’s performance under the Investment Test in Tennessee is rated High Satisfactory.

Conclusions for Area/Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA was good.

The institution had a significant level of qualified CD investments and grants. The institution exhibited good responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA	2	\$1,030	25	\$407	27	100.00	\$1,437	100.00%	0	\$0
Total	2	\$1,030	25	\$407	27	100.00%	\$1,437	100.00%	0	\$0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The institution has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. Investment opportunities are limited with and competition for investments was significant. Despite these challenges, FNB was successful in purchasing revenue bonds and municipal instruments for CD.

Qualified investments total \$1.4 million, which includes prior period investments, current period investments, and qualified grants. Investments benefiting the AA during the evaluation period represented 4.1 percent of allocated capital. The institution did not have any unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of four bonds totaling \$1.0 million. This included two municipal bonds and two revenue bonds to finance the extension and improvements to water and sewage systems in LMI geographies within the AA.

The following are examples of qualified grants in the AA:

- Four grants totaling \$14,250 to a nonprofit that serves LMI individuals. The organization’s mission is to provide shelter and life recovery programs for single mothers and children experiencing homelessness.
- A grant totaling \$2,500 to a foundation that serves an LMI community. This foundation’s mission is to revitalize and stabilize a community predominantly occupied by LMI individuals through improvements, restoration, and updates to historical structures.
- Two grants totaling \$3,438 to a school district in which the majority of the students qualify for free or reduced lunch. These donations help the school be able to provide for LMI students in activities and provide school supplies to those who otherwise could not afford them.

SERVICE TEST

The bank’s performance under the Service Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank’s performance in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA was adequate.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution’s AA.

													2022-2024	
Assessment Area	Deposits	Branches			Location of Branches by Income of Geographies (%)					Population within Each Geography				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA	100.00	3	100.00	0.00	66.77	0.00	33.33	0.00	4.62	19.33	43.92	32.13	0.00	

Source: FFIEC File – 2020, 2024 Census
1/1/202 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution did not open or close any branches during the evaluation period.

The geographic distribution of branches shows higher accessibility to LMI geographies within the Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA. The bank has branches located in middle- or upper-income tracts with close proximity to LMI geographies in all AAs.

Tennessee branch lobby hours are open from 8:30 a.m. to 4:00 p.m. Monday through Thursday and 8:30 a.m. to 5:00 p.m. on Fridays. One Tennessee branch lobby is open from 8:30 a.m. to 12:00 p.m. on Saturdays.

Services, including where appropriate, business hours did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals.

Community Development Services

Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA

The institution provided an adequate level of CD services.

During the evaluation period, six employees from various lines of business partnered with two organizations and contributed 90 hours supporting LMI individuals and families. This included serving on the board of both organizations which support community service.

Examples of CD services include:

- A loan officer serves on the board of an organization that provides health services for LMI persons. The employee provided 78 service hours during the evaluation period.
- An employee serves on the board of an organization that provides health services, financial literacy education, workforce development programs and affordable housing for LMI persons. The employee provided 12 service hours during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Arkansas		
Arkansas Non-MSA AA	Full-scope	Clay, Cleburne, and Greene Counties
Jonesboro, AR MSA AA	Full-scope	Craighead County
Fayetteville-Springdale-Rogers, AR MSA AA	Limited-scope	Pulaski County
Little Rock-North Little Rock-Conway, AR MSA AA	Limited-scope	Benton* and Washington Counties
State of Tennessee		
Nashville-Davidson-Murfreesboro-Franklin, TN MSA AA	Full-scope	Sumner* and Trousdale Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First National Bank	Outstanding	Outstanding	Low Satisfactory	Outstanding
MMSA or State:				
State of Arkansas	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Tennessee	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A

Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 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 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - Compares the percentage distribution of the number of small loans (less than or equal to

\$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

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

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 – 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Arkansas Non-MSA 2024	455	65,641	54.56	6,938	--	--	--	11.02	23.96	11.17	54.84	47.47	52.52	32.71	27.91	35.37	1.42	0.66	0.94		
Jonesboro, AR MSA 2024	272	51,917	32.61	9,231	0.50	1.47	0.83	16.68	19.85	17.86	39.21	30.51	37.16	43.60	48.16	44.14	--	--	--		
Fayetteville-Springdale-Rogers, AR MSA 2024	66	29,074	7.91	32,315	2.17	4.55	2.16	21.11	22.73	16.28	49.35	42.42	50.16	27.02	25.76	30.99	0.36	4.55	0.42		
Little Rock-North Little Rock-Conway, AR MSA 2024	41	20,882	4.92	29,736	6.05	4.88	6.69	21.81	17.07	19.76	35.21	17.07	36.43	36.92	60.98	37.12	--	--	--		
Total	834	167,514	100.00	78,220	3.46	1.08	3.53	19.74	22.18	17.34	42.53	40.05	43.62	34.00	35.97	35.26	0.28	0.72	0.26		

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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 – 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	107	32,630	100.00	18,267	2.37	7.48	2.58	17.67	45.79	20.82	44.97	34.58	35.78	34.99	12.15	40.81	--	--	--		
Total	107	32,630	100.00	18,267	2.37	7.48	2.58	17.67	45.79	20.82	44.97	34.58	35.78	34.99	12.15	40.81	--	--	--		

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 – 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Arkansas Non-MSA 2024	455	65,641	54.56	6,938	17.43	9.23	4.51	19.65	11.87	12.84	21.55	16.48	18.42	41.38	40.44	37.19	--	21.98	27.04		
Jonesboro, AR MSA 2024	272	51,917	32.61	9,231	20.74	8.82	5.49	15.89	8.82	14.43	19.53	10.29	17.81	43.84	45.59	33.63	--	26.47	28.64		
Fayetteville-Springdale-Rogers, AR MSA 2024	66	29,074	7.91	32,315	22.67	1.52	5.29	19.40	7.58	14.15	18.98	1.52	19.47	38.95	34.85	39.80	--	54.55	21.29		
Little Rock-North Little Rock-Conway, AR MSA 2024	41	20,882	4.92	29,736	25.23	7.32	6.87	15.75	4.88	16.63	18.54	9.76	17.59	40.49	34.15	33.20	--	43.90	25.71		
Total	834	167,514	100.00	78,220	22.95	8.39	5.84	17.49	10.19	15.01	19.13	12.95	18.47	40.43	41.37	36.33	--	27.10	24.35		

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 – 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	107	32,630	100.00	18,267	17.84	11.21	5.97	17.02	14.95	16.02	22.68	15.89	21.60	42.46	40.19	39.02	--	17.76	17.39		
Total	107	32,630	100.00	18,267	17.84	11.21	5.97	17.02	14.95	16.02	22.68	15.89	21.60	42.46	40.19	39.02	--	17.76	17.39		

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%

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
Arkansas Non-MSA 2024	801	77,475	47.03	3,136	--	--	--	15.55	19.35	12.85	54.03	53.18	52.74	29.33	27.09	33.51	1.10	0.37	0.89
Jonesboro, AR MSA 2024	682	64,928	40.05	5,801	2.57	0.15	1.12	26.14	24.05	25.20	38.06	36.36	38.89	33.24	39.44	34.79	--	--	--
Fayetteville-Springdale-Rogers, AR MSA 2024	78	16,527	4.58	16,728	5.05	3.85	3.86	22.72	11.54	21.13	40.62	46.15	43.16	28.49	32.05	28.39	3.13	6.41	3.46
Little Rock-North Little Rock-Conway, AR MSA 2024	142	23,470	8.34	20,771	8.05	11.27	7.96	23.96	15.49	22.50	29.20	15.49	29.97	38.30	57.75	39.43	0.49	--	0.13
Total	1,703	182,400	100.00	46,436	6.09	1.17	5.09	23.28	20.55	21.69	35.16	42.98	37.37	34.14	34.82	34.48	1.32	0.47	1.37

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

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
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	325	24,534	100.00	8,365	3.33	3.08	2.79	18.01	45.23	15.77	43.85	40.00	44.46	34.80	11.69	36.99	--	--	--
Total	325	24,534	100.00	8,365	3.33	3.08	2.79	18.01	45.23	15.77	43.85	40.00	44.46	34.80	11.69	36.99	--	--	--

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

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
Arkansas Non-MSA 2024	801	77,475	47.03	3,136	82.02	75.28	62.05	4.43	20.85	13.54	3.87
Jonesboro, AR MSA 2024	682	64,928	40.05	5,801	82.66	75.81	56.51	4.70	13.49	12.64	10.70
Fayetteville-Springdale-Rogers, AR MSA 2024	78	16,527	4.58	16,728	82.26	70.51	51.41	3.93	20.51	13.80	8.97
Little Rock-North Little Rock-Conway, AR MSA 2024	142	23,470	8.34	20,771	82.49	47.89	49.56	4.96	42.25	12.54	9.86
Total	1,703	182,400	100.00	46,436	82.41	72.99	51.94	4.58	19.67	13.01	7.34

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

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
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	325	24,534	100.00	8,365	87.25	80.31	56.23	3.12	17.54	9.64	2.15
Total	325	24,534	100.00	8,365	87.25	80.31	56.23	3.12	17.54	9.64	2.15

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

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Arkansas Non-MSA 2024	415	64,180	86.10	721	--	--	--	11.74	15.66	12.62	58.30	58.80	56.59	29.55	25.54	30.10	0.40	--	0.69
Jonesboro, AR MSA 2024	67	11,172	13.90	701	1.06	--	--	24.03	37.31	18.54	36.40	28.36	39.51	38.52	34.33	41.94	--	--	--
Fayetteville-Springdale-Rogers, AR MSA 2024	0	0	0.00	546	2.96	--	0.73	22.41	--	40.66	49.68	--	48.35	24.10	--	10.26	0.85	--	--
Little Rock-North Little Rock-Conway, AR MSA 2024	0	0	0.00	168	6.66	--	5.36	23.72	--	14.29	28.16	--	33.33	41.30	--	47.02	0.17	--	--
Total	482	75,352	100.00	2,136	3.52	--	0.61	21.52	18.67	21.86	40.72	54.56	47.05	33.86	26.76	30.24	0.38	--	0.23

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

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

Assessment Area:	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	734,303		100.00	145	1.94	--	--	24.27	57.53	60.00	42.23	39.73	29.66	31.55	2.74	10.34	--	--	--
Total	734,303		100.00	145	1.94	--	--	24.27	57.53	60.00	42.23	39.73	29.66	31.55	2.74	10.34	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022-2023 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Arkansas Non-MSA 2024	415	64,180	86.10	721	97.17	78.55	62.00	1.21	19.28	1.62	2.17
Jonesboro, AR MSA 2024	67	11,172	13.90	701	95.41	77.61	49.50	2.12	22.39	2.47	--
Fayetteville-Springdale-Rogers, AR MSA 2024	0	0	0.00	546	96.83	--	73.63	0.63	--	2.54	--
Little Rock-North Little Rock-Conway, AR MSA 2024	0	0	0.00	168	94.03	--	63.10	1.71	--	4.27	--

Total
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022-2023 CRA Aggregate Data, "--" data not available.

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

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2024	734,303		100.00	145	1.94	--	--	24.27	57.53	60.00	42.23
Total	734,303		100.00	145	1.94	--	--	24.27	57.53	60.00	42.23

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%