

PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Financial Bank
RSSD #48374**

**300 East Peach Street
El Dorado, Arkansas 71730**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

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, nor should it be construed as, an assessment of the financial condition of the 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.

TABLE OF CONTENTS

I.	Institution Rating	1
II.	Institution	1
	a. Scope of Examination	1
	b. Description of Institution	3
	c. Conclusions with Respect to Performance Tests	5
	d. Fair Lending or Other Illegal Credit Practices Review	8
III.	Arkansas	
	a. Summary	
	i. State Rating	9
	ii. Scope of Examination	9
	iii. Description of Institution's Operations	10
	iv. Conclusions with Respect to Performance Tests	11
	b. Union County Nonmetropolitan Statistical Area (full-scope review)	
	i. Description of Institution's Operations in the Union County Assessment Area	13
	ii. Conclusions with Respect to Performance Tests in the Union County Assessment Area	16
	c. East Arkansas Nonmetropolitan Statistical Area (limited-scope review)	
	i. Description of Institution's Operations in the East Arkansas Assessment Area	22
	ii. Conclusions with Respect to Performance Tests in the East Arkansas Assessment Area	23
	d. Polk County Nonmetropolitan Statistical Area (limited-scope review)	
	i. Description of Institution's Operations in the Polk County Assessment Area	24
	ii. Conclusions with Respect to Performance Tests in the Polk County Assessment Area	25
	e. Jonesboro, Arkansas Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution's Operations in the Jonesboro MSA Assessment Area	26
	ii. Conclusions with Respect to Performance Tests in the Jonesboro MSA Assessment Area	29
	f. Little Rock-North Little Rock-Conway, Arkansas Metropolitan Statistical Area (limited-scope review)	
	i. Description of Institution's Operations in the Little Rock Assessment Area	35
	ii. Conclusions with Respect to Performance Tests in the Little Rock Assessment Area	36

IV.	Mississippi	
a.	Summary	
i.	State Rating.....	37
ii.	Scope of Examination	37
iii.	Description of Institution’s Operations.....	38
iv.	Conclusions with Respect to Performance Tests	39
b.	Mississippi Nonmetropolitan Statistical Area (full-scope review)	
i.	Description of Institution’s Operations in the Leake County Assessment Area.....	41
ii.	Conclusions with Respect to Performance Tests in the Leake County Assessment Area	44
c.	Memphis, Tennessee-Mississippi-Arkansas Metropolitan Statistical Area (limited-scope review)	
i.	Description of Institution’s Operations in the Memphis Assessment Area.....	49
ii.	Conclusions with Respect to Performance Tests in the Memphis Assessment Area.....	50
V.	Appendices	
a.	Scope of Examination Tables	51
b.	Summary of State Ratings	52
c.	Maps of the Assessment Areas	53
d.	Lending Performance Tables for Limited-Scope Review Assessment Areas	57
e.	Glossary	73

INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Satisfactory

First Financial Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending and community development activities. The factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas.
- A majority of loans and other lending-related activities are in the assessment areas.
- Distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels (including low- and moderate-income (LMI)) and businesses of different revenue sizes.
- Geographic distribution of loans reflects a reasonable dispersion throughout the assessment areas.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of its assessment areas, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment areas. The bank has responded to these needs through community development loans, qualified investments, and community development services.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC) Intermediate Small Bank Procedures. The Intermediate Small Bank Examination Procedures entail two performance tests: the Lending Test and the Community Development Test. Bank performance under these tests is rated at the institution level and state levels. The bank maintains operations in seven delineated assessment areas within two states: Arkansas and Mississippi. The bank's operations in Arkansas include one assessment area in the Little Rock-North Little Rock-Conway, Arkansas metropolitan statistical area (Little Rock MSA), one assessment area in the Jonesboro, Arkansas MSA, and three assessment areas in nonmetropolitan portions of Arkansas. The bank has two assessment areas in Mississippi: one in the Mississippi portion of the Memphis, Tennessee-Mississippi-Arkansas MSA (Memphis MSA) and one in a nonmetropolitan portion of Mississippi. In light of these characteristics, the bank

received three sets of ratings: overall institution ratings, ratings for the state of Arkansas, and ratings for the state of Mississippi.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2024.

Rated Areas	Offices		Deposits		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full-Scope	Limited-Scope	TOTAL
Arkansas	15	88.2%	\$1,137,708	80.9%	2	3	5
Mississippi	2	11.8%	\$268,072	19.1%	1	1	2
OVERALL¹	17	100.0%	\$1,405,780	100.0%	3	4	7

In light of branch structure, loan and deposit activity, and the bank's CRA evaluation history, CRA performance in the state of Arkansas was given primary consideration. Furthermore, residential real estate (RRE), small business, and small farm loans were used to evaluate lending performance, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy. The loan activity represented by these credit products is deemed indicative of the bank's overall lending performance. However, as the bank has a particular emphasis in commercial lending, performance based on the small business loan category carried the most significance toward the overall performance conclusions. In addition, given that small farm lending is a less significant product category by number of loans originated, the least weight was placed on small farm performance. Further, the majority of loans in the small farm loan category were originated outside of the bank's delineated assessment areas. As such, while small farm lending was included in the analysis of the assessment area concentration, there was not enough volume to perform a meaningful analysis in any of the assessment areas. Therefore, small farm loans were not included in the geographic and borrower distribution tests for this review. The following table details the performance criteria and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	September 30, 2021 – September 30, 2024
Assessment Area Concentration	January 1, 2022 – December 31, 2022
Loan Distribution by Borrower's Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	September 6, 2021 – November 3, 2024
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on Home Mortgage Disclosure Act

¹ Note: In this table and others throughout this document, percentages may not total 100% due to rounding.

(HMDA) and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2020 American Community Survey (ACS) data; certain business demographics are based on 2022 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$1.8 billion to \$2.7 billion as of September 30, 2024.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment areas:

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered.

To augment this evaluation, three community contact interviews were conducted with members of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment areas. Information from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area in which they were conducted.

DESCRIPTION OF INSTITUTION

First Financial Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by First Financial Banc Corporation, a one-bank holding company; the bank and its holding company are both headquartered in El Dorado, Arkansas. The bank's branch network consists of 17 offices, 15 of which have cash-dispensing-only ATMs on site. Fifteen branches also have drive-up accessibility. In addition, five cash-dispensing-only ATMs are maintained; four are standalone ATMs, and one is located at the bank's corporate headquarters. In addition to its retail branch operations, the bank also operates a network of 18 loan production offices (LPOs) specializing in mortgage or agricultural lending. All mortgage LPOs are located in Arkansas, while the agricultural LPOs span the eastern and southern United States. The bank did not open or close any branches during the review period; however, three LPOs located outside of the assessment areas were closed. Based on this branch network and

other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities, the bank is well positioned to deliver financial services to the entirety of its assessment areas.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of September 30, 2024, the bank reported total assets of \$1.8 billion. As of the same date, loans and leases outstanding were \$1.4 billion (80.9 percent of total assets), and deposits totaled \$1.4 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of September 30, 2024		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Farmland	\$838,790	58.5%
Commercial Real Estate	\$160,283	11.2%
Construction and Development	\$139,912	9.8%
Commercial and Industrial	\$119,539	8.3%
1–4 Family Residential	\$81,088	5.7%
Farm Loans	\$59,661	4.2%
Loans to Individuals	\$27,467	1.9%
Multifamily Residential	\$5,630	0.4%
Total Other Loans	\$1,530	0.1%
TOTAL	\$1,433,900	100%

As indicated by the table above, a significant portion of lending resources are directed to farmland loans, commercial loans, and loans secured by 1–4 family residential properties. The bank also originates and subsequently sells a significant volume of RRE loans. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. Additionally, while not detailed in the table above, small farm loans represent a significant portion of the bank's lending portfolio by dollar volume, but both HMDA and small business loans far exceed small farm loans in number of loans originated during the review period.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on September 6, 2021.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Rated Area	Lending Test Rating
Arkansas	Satisfactory
Mississippi	Outstanding
OVERALL	SATISFACTORY

First Financial Bank meets the standards for a satisfactory Lending Test rating under the Intermediate Small Bank Procedures, which evaluate bank performance under the following five criteria, as applicable.

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 13-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size \$ (000s) as of September 30, 2024	Average LTD Ratio
First Financial Bank	El Dorado, Arkansas	\$1,771,691	88.7%
Regional Banks	Paragould, Arkansas	\$2,442,695	94.1%
	Arkadelphia, Arkansas	\$2,739,322	75.9%
	Stuttgart, Arkansas	\$1,842,684	76.8%

Based on data from the previous table, the bank's level of lending is in line with those of other banks in the region. During the review period, the bank's quarterly LTD ratio experienced an increasing trend, with a 13-quarter average of 88.7 percent. The bank's LTD at the beginning of the review period was 71.4 percent. Conversely, the bank's LTD as of the commencement of this examination was 98.1 percent. In comparison, the average LTD ratios for the regional peers ranged from 75.9 percent to 94.1 percent and had a generally stable trend. Therefore, compared to data from regional banks, the bank's average LTD ratio is reasonable given the bank's size, financial condition, and credit needs of its assessment areas.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

Lending Inside and Outside the Assessment Areas January 1, 2022 through December 31, 2022								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
Small Business	80	64.5	5,851	42.4	44	35.5	7,941	57.6
HMDA	267	57.2	47,672	55.3	200	42.8	38,547	44.7
Small Farm	32	28.8	4,556	24.2	79	71.2	14,253	75.8
TOTAL LOANS	379	54.0	58,079	48.9	323	46.0	60,741	51.1

As shown above, a majority of loans by number (54.0 percent) were made inside the bank's assessment areas. As previously noted, the bank operates a substantial LPO network, which includes 12 LPOs located outside of the assessment areas, resulting in a significant portion of loans made outside of the assessments area, particularly small farm loans. However, as previously stated, while small farm loans represent a significant portion of the bank's lending by dollar volume, small business and HMDA loans are more significant by number of loans originated. Therefore, the bank's performance reflects that it is meeting the credit needs of its assessment areas, in addition to making credit available to consumers and businesses/farms outside of its assessment areas.

Borrower and Geographic Distribution

Overall, performance by borrower's income and revenue profile is reasonable, based on the analyses of small business and HMDA lending in Arkansas and Mississippi, as displayed in the following table. As previously mentioned, small farm loans were not included in the borrower and geographic distribution analyses. Further, greater emphasis was placed on conclusions in the state of Arkansas due to higher loan and deposit activity compared to the state of Mississippi.

Rated Area	Loan Distribution by Borrower's Profile
Arkansas	Reasonable
Mississippi	Excellent
OVERALL	REASONABLE

As displayed in the following table, the bank's overall distribution of lending by income level of census tract reflects reasonable penetration throughout the rated areas subject to review.

Rated Area	Geographic Distribution of Loans
Arkansas	Reasonable
Mississippi	Excellent
OVERALL	REASONABLE

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (September 6, 2021, through November 3, 2024).

COMMUNITY DEVELOPMENT TEST

First Financial Bank's performance under the Community Development Test is rated satisfactory. The bank demonstrates adequate responsiveness to the community development needs of the Arkansas assessment areas, considering the bank's capacity and the need and availability of such opportunities for community development. However, performance in the Mississippi assessment areas is below the state of Arkansas and considered poor. As previously mentioned, greater emphasis was placed on the state of Arkansas in determining overall ratings due to the bank's branch structure and loan and deposit activity in the state. As a result, the overall rating for the Community Development Test is satisfactory.

Rated Area	Community Development Test Rating
Arkansas	Satisfactory
Mississippi	Needs to Improve
OVERALL	SATISFACTORY

During the review period, the bank made 13 qualifying loans in its assessment areas totaling approximately \$43.0 million. Of these loans, two promoted affordable housing, seven were made to revitalize or stabilize LMI and distressed/underserved geographies, and four were for economic development.

The bank also made community development investments and donations in its assessment areas totaling \$6.2 million. This amount includes 4 new qualified investments totaling \$4.7 million, 5 continuing investments made in a prior review period totaling \$1.2 million, and 173 donations totaling \$320,948. Most investments were in municipal bonds supporting Arkansas school districts with a majority of students from LMI families.

During the review period, 49 bank employees used financial expertise to log approximately 2,359 hours of service to 59 different community development organizations within the bank's assessment areas. Service activities included delivering financial education in schools that primarily serve LMI families, providing financial expertise to community service organizations as board of directors (board) members, and providing financial expertise to economic development initiatives.

Additionally, the bank received consideration at the state and institution level for several investments and services that have community development benefits in the broader statewide/regional areas that include the bank's assessment areas. First, at the institution level, the bank had investments in six small business investment company funds totaling \$3.9 million, which support economic development in regional areas that include Arkansas and Mississippi. Second, the bank made three investments totaling \$310,000 that support affordable housing initiatives across the state of Arkansas. Further, at the institution level, one employee provided 280 hours of service to one community development organization. At the statewide Arkansas level, two employees also provided 26 hours of service to two organizations supporting community development efforts across the state.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

ARKANSAS

CRA RATING FOR ARKANSAS:

Satisfactory

The Lending Test is rated:

Satisfactory

The Community Development Test is rated:

Satisfactory

Major factors supporting the institution's Arkansas rating include the following:

- The distribution of loans in the Arkansas assessment areas reflects reasonable penetration among individuals of different income levels (including LMI levels) and businesses of different sizes.
- Overall, the geographic distribution of loans reflects reasonable dispersion throughout the Arkansas assessment areas.
- The bank's community development performance demonstrates adequate responsiveness to community development needs through community development loans, qualified investments, and community development services, considering the need and availability of such opportunities for community development in the bank's assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Arkansas assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The ratings in the state of Arkansas reflect a composite of the bank's performance in the assessment areas evaluated with full-scope procedures throughout the state. Three of the bank's Arkansas assessment areas are in nonMSA Arkansas (one full-scope review and two limited-scope reviews), while the remaining two are located in the Jonesboro, Arkansas MSA (full-scope review) and Little Rock, Arkansas MSA (limited-scope review). In light of branch structure, loan/deposit activity, and the bank's CRA evaluation history, performance in the Union County assessment area received primary consideration when making overall statewide performance conclusions. Furthermore, small business lending performance carried more weight when making overall Lending Test performance conclusions.

To augment the evaluation of the full-scope review assessment areas in Arkansas, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Both interviews were with representatives from agencies specializing in economic development. Details from these interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARKANSAS

First Financial Bank operates 15 offices (88.2 percent of total branches) throughout five CRA assessment areas in the state of Arkansas. The following table gives additional detail regarding the bank's operations within Arkansas.

Assessment Area	Offices		Deposits As of June 30, 2024		Review Procedures
	#	%	\$	%	
Union County	6	40.0%	\$648,732	57.0%	Full Scope
Jonesboro MSA	2	13.3%	\$76,237	6.7%	Full Scope
East Arkansas	5	33.3%	\$290,106	25.5%	Limited Scope
Little Rock	1	6.7%	\$40,461	3.6%	Limited Scope
Polk County	1	6.7%	\$82,172	7.2%	Limited Scope
TOTAL	15	100%	\$1,137,708	100%	2 – Full Scope

The bank did not open or close any branches in the state of Arkansas during the review period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

First Financial Bank's Lending Test rating for the state of Arkansas is satisfactory. The bank's overall distribution of loans by borrower's income and revenue profile reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects reasonable penetration throughout the Arkansas assessment areas.

Borrower and Geographic Distribution

Overall, performance by borrower's income and revenue profile is reasonable in Arkansas, based on the analysis of lending in the bank's two full-scope assessment areas, as displayed in the following table.

Full-Scope Review Assessment Areas	Loan Distribution by Borrower's Profile
Union County	Reasonable
Jonesboro MSA	Excellent
OVERALL	REASONABLE

Limited-Scope Review Assessment Areas	Loan Distribution by Borrower's Profile
East Arkansas	Exceeds
Polk County	Consistent
Little Rock	Consistent

While bank performance in the Jonesboro MSA assessment area is excellent, reasonable performance in the primary Union County assessment area was given greater consideration when arriving at the overall statewide performance conclusion.

The bank's overall geographic distribution of loans reflects reasonable penetration throughout Arkansas, based on the analysis of the lending in the two full-scope assessment areas, as displayed in the following tables.

Full-Scope Review Assessment Areas	Geographic Distribution of Loans
Union County	Reasonable
Jonesboro MSA	Reasonable
OVERALL	REASONABLE

Limited-Scope Review Assessment Areas	Geographic Distribution of Loans
East Arkansas	Consistent
Polk County	Below
Little Rock	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test rating in the state of Arkansas is satisfactory. The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of the Arkansas assessment areas, considering the bank's capacity and the need/availability of such opportunities for community development. The bank has addressed the community development needs of its assessment areas through community development loans, qualified investments, and community development services.

Full-Scope Review Assessment Areas	Community Development Performance
Union County	Excellent
Jonesboro MSA	Poor
OVERALL	ADEQUATE

Limited-Scope Review Assessment Areas	Community Development Performance
East Arkansas	Exceeds
Little Rock	Consistent
Polk County	Consistent

The bank extended 13 community development loans totaling \$43.0 million within the Arkansas assessment areas. Of these loans, two promoted affordable housing, seven were made to revitalize or stabilize LMI geographies, and four were for economic development.

In addition, the bank had nine community development investments totaling \$5.9 million benefitting the bank's Arkansas assessment areas; most of these investments were in bonds serving school districts with a majority of students from LMI families. Also, the bank made 151 donations totaling \$307,309; while the bank made numerous donations benefitting various organizations with a community development purpose in Arkansas assessment areas, the majority of donation dollars were to an entity promoting economic development in downtown El Dorado, Arkansas, and nearby surrounding areas. Finally, 43 bank employees provided 2,208 service hours to 52 entities with a primary purpose of community development.

As mentioned earlier, the bank also received consideration for investments and services that have community development benefits in the broader statewide region that includes the bank's assessment areas. The bank made three investments totaling \$310,000 that support affordable housing initiatives in the state of Arkansas. Further, one employee provided 26 hours of service to one community development organization that supports economic development throughout Arkansas.

UNION COUNTY NONMETROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE UNION COUNTY ASSESSMENT AREA

Bank Structure

The bank operates 6 of its 17 total offices (35.3 percent) in this assessment area. Of the six offices, one is in a moderate-income census tract, three are in middle-income census tracts, and two are in upper-income census tracts. Since the last evaluation, the bank did not open or close any branches in this assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area comprises Union County in its entirety. This is the bank's primary assessment area and is located in southern Arkansas along the Louisiana border. Based on 2020 ACS data, the assessment area population was 39,054. Of the seven FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked first in deposit market share, encompassing 42.4 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products. Other particular credit needs in the assessment area, as noted by a community contact, include safe affordable housing. The contact characterized the housing stock as older and in short supply, with new construction failing to fill demand.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	0	2	6	4	0	12
	0.0%	16.7%	50.0%	33.3%	0.0%	100%
Family Population	0	1,492	5,436	3,264	0	10,192
	0.0%	14.6%	53.3%	32.0%	0.0%	100%

As shown above, 16.7 percent of the census tracts in the assessment area are moderate-income geographies, but only 14.6 percent of the family population resides in these tracts. These moderate-income areas are located inside the city of El Dorado.

Based on 2020 ACS data, the median family income for the assessment area was \$59,045. At the same time, the median family income for nonMSA Arkansas as a whole was \$53,702. More recently, the FFIEC estimates the 2022 median family income for nonMSA Arkansas to be \$60,200. The following table displays population percentages of assessment area families by income level compared to the nonMSA Arkansas family populations.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	2,102	1,678	1,711	4,701	10,192
	20.6%	16.5%	16.8%	46.1%	100%
NonMSA Arkansas	59,832	53,245	58,635	118,518	290,230
	20.6%	18.3%	20.2%	40.8%	100%

As shown in the table above, 37.1 percent of families within the assessment area were considered LMI, which is slightly lower than the LMI family percentage of 38.9 percent in nonMSA Arkansas. However, the percentage of families living below the poverty level in the assessment area (15.9 percent) is slightly higher than the 13.5 percent level in nonMSA Arkansas. Considering these factors, the assessment area income levels appear to be similarly affluent to nonMSA Arkansas as a whole.

Housing Demographics

Housing demographic information is displayed in the following table for the assessment area, nonMSA Arkansas, and the state of Arkansas as a whole.

Housing Cost Burden						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	79.4%	33.6%	37.2%	54.4%	28.4%	17.7%
NonMSA Arkansas	62.7%	28.4%	34.5%	50.4%	23.5%	15.5%
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						

According to the chart above, more low- and moderate-income renters are cost burdened in the assessment area than nonMSA Arkansas, which suggests that LMI families in the assessment area might struggle to save for a down payment, and, ultimately, purchase a home. This is further supported by the assessment area having a higher median rental rate (\$708 per month) than nonMSA Arkansas (\$640 per month). Similarly, the chart shows that homeowners in the assessment area are more cost burdened than homeowners throughout nonMSA Arkansas. The community contact also indicated there is a limited supply of affordable housing stock in the assessment area, which would create additional barriers for LMI families seeking homeownership.

Industry and Employment Demographics

The assessment area supports a diverse business community. According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS), Quarterly Census of Employment and Wages data, there are 16,844 employees in the assessment area (including 2,345 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are manufacturing (20.5 percent), followed by retail trade (14.0 percent) and healthcare and social assistance (13.2 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and nonMSA Arkansas as a whole.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2021	2022	2023
Assessment Area	6.1%	4.7%	4.6%
NonMSA Arkansas	4.5%	3.8%	3.9%

As shown in the table above, unemployment levels in the assessment area were consistently higher than those of nonMSA Arkansas throughout the review period. Unemployment levels were higher in 2021 for both the assessment area and nonMSA Arkansas due to lingering impacts of the COVID-19 pandemic. Further, the data suggests that impacts of the pandemic persisted for a longer duration in the assessment area than the rest of nonMSA Arkansas.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. The interviewee categorized the local economy as stable and performing well overall. Nonetheless, the contact referenced elevated unemployment levels and challenges for local businesses to find qualified employees. However, while the contact stated there is demand for employees, workers either lack awareness of where job demand resides or are unwilling to expand their employment search into new industries. The contact noted that adult education programs that connect qualified workers to in-demand trainings and certifications would benefit LMI individuals within the community.

The community contact cited the need for affordable housing as the biggest challenge facing the region. More specifically, the contact noted an older housing stock that is in high demand and minimal new construction occurring. 2020 ACS data confirms that housing stock is older compared to nonMSA Arkansas as a whole. Further, the contact cited rising home prices coupled with low incomes and poor credit scores as the largest barrier preventing homeownership in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE UNION COUNTY ASSESSMENT AREA

LENDING TEST

The distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects reasonable penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

The bank's small business loan distribution performance is excellent, and HMDA loan distribution by borrower's profile is poor, resulting in overall reasonable performance when considering both loan categories. First, small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2022 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: Union County								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	21	91.3%	48.0%	\$780	81.9%	35.1%	87.8%
	Over \$1 Million/Unknown	2	8.7%	52.0%	\$172	18.1%	64.9%	12.2%
	TOTAL	23	100.0%	100.0%	\$952	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	21	91.3%	87.3%	\$629	66.1%	29.2%	
	\$100,001–\$250,000	2	8.7%	7.2%	\$323	33.9%	22.6%	
	\$250,001–\$1 Million	0	0.0%	5.4%	\$0	0.0%	48.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	23	100.0%	100.0%	\$952	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	19	90.5%		\$457	58.6%		
	\$100,001–\$250,000	2	9.5%		\$323	41.4%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	21	100.0%		\$780	100.0%		

The bank's level of lending to small businesses is excellent. The bank originated 91.3 percent of small business loans to businesses with revenues of \$1 million or less. In comparison, assessment area demographics estimate that 87.8 percent of businesses in the assessment area had annual revenues of \$1 million or less, and the 2022 aggregate lending level to small businesses was 48.0 percent.

HMDA loans were also reviewed to determine the bank's lending levels to individuals of different income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$60,200 for nonMSA Arkansas as of 2022). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2022 aggregate data for the assessment area is displayed.

Borrower Distribution of HMDA Loans Assessment Area: Union County								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	5.7%	4.2%	\$117	2.1%	2.0%	20.6%
	Moderate	3	8.6%	15.3%	\$389	7.0%	9.9%	16.5%
	Middle	6	17.1%	17.6%	\$512	9.2%	12.1%	16.8%
	Upper	14	40.0%	39.8%	\$3,588	64.3%	52.8%	46.1%
	Unknown	10	28.6%	23.0%	\$978	17.5%	23.3%	0.0%
	TOTAL	35	100.0%	100.0%	\$5,584	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	5.8%	\$0	0.0%	3.2%	20.6%
	Moderate	1	11.1%	12.8%	\$96	6.3%	8.5%	16.5%
	Middle	1	11.1%	20.9%	\$100	6.5%	17.5%	16.8%
	Upper	5	55.6%	51.7%	\$1,225	79.8%	59.0%	46.1%
	Unknown	2	22.2%	8.7%	\$114	7.4%	11.8%	0.0%
	TOTAL	9	100.0%	100.0%	\$1,535	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	5.6%	\$0	0.0%	1.4%	20.6%
	Moderate	0	0.0%	22.2%	\$0	0.0%	17.8%	16.5%
	Middle	0	0.0%	5.6%	\$0	0.0%	5.5%	16.8%
	Upper	0	0.0%	55.6%	\$0	0.0%	64.4%	46.1%
	Unknown	1	100.0%	11.1%	\$52	100.0%	11.0%	0.0%
	TOTAL	1	100.0%	100.0%	\$52	100.0%	100.0%	100.0%

Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Unknown	1	100.0%	100.0%	\$120	100.0%	100.0%	N/A
	TOTAL	1	100.0%	100.0%	\$120	100.0%	100.0%	N/A
HMDA TOTALS	Low	2	4.3%	4.6%	\$117	1.6%	2.2%	20.6%
	Moderate	4	8.7%	14.2%	\$485	6.7%	9.1%	16.5%
	Middle	7	15.2%	18.1%	\$612	8.4%	13.0%	16.8%
	Upper	19	41.3%	42.1%	\$4,813	66.0%	51.4%	46.1%
	Unknown	14	30.4%	21.0%	\$1,264	17.3%	24.4%	0.0%
	TOTAL	46	100.0%	100.0%	\$7,291	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (4.3 percent) is substantially below the low-income family population figure (20.6 percent) but in line with the 2022 aggregate lending level to low-income borrowers (4.6 percent), reflecting reasonable performance. The bank's level of lending to moderate-income borrowers (8.7 percent) is below both the moderate-income family population percentage (16.5 percent) and the 2022 aggregate lending level to moderate-income borrowers (14.2 percent), reflecting poor performance. Therefore, considering performance to both income categories, the bank's overall distribution of HMDA loans by borrower's profile is poor.

Geographic Distribution of Loans

As noted previously, the assessment area includes no low-income and two moderate-income census tracts, representing 16.7 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area reflects reasonable penetration throughout these moderate-income census tracts, based on the small business and HMDA loan categories. As previously stated, performance in the small business loan category carried the most significance in the overall rating of reasonable for geographic distribution. Furthermore, based on reviews from both loan categories, the bank had loan activity in all assessment area census tracts, and there were no conspicuous lending gaps noted in the moderate-income geographies. This information supports the conclusion that the overall geographic distribution of loans is reasonable.

The following table displays 2022 small business loan activity by geography income level compared to the location of businesses throughout the assessment area and 2022 small business aggregate data.

Geographic Distribution of Small Business Loans Assessment Area: Union County							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	3	13.0%	15.7%	\$23	2.4%	23.2%	15.7%
Middle	9	39.1%	39.9%	\$521	54.7%	43.2%	42.3%
Upper	11	47.8%	42.9%	\$408	42.9%	33.2%	42.1%
Unknown	0	0.0%	1.6%	\$0	0.0%	0.4%	0.0%
TOTAL	23	100.0%	100.0%	\$952	100.0%	100.0%	100.0%

The bank's percentage of loans in moderate-income census tracts (13.0 percent) is similar to the 2022 aggregate lending percentage in moderate-income census tracts (15.7 percent) and the percentage of businesses in moderate-income census tracts (15.7 percent), representing reasonable performance. Therefore, the bank's overall geographic distribution of small business loans is reasonable.

Next, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2022 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of HMDA Loans Assessment Area: Union County								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	2	5.7%	7.3%	\$85	1.5%	3.7%	9.5%
	Middle	19	54.3%	54.0%	\$2,876	51.5%	53.7%	53.1%
	Upper	14	40.0%	38.7%	\$2,623	47.0%	42.6%	37.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	35	100.0%	100.0%	\$5,584	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	11.1%	10.5%	\$78	5.1%	5.0%	9.5%
	Middle	2	22.2%	39.0%	\$347	22.6%	38.3%	53.1%
	Upper	6	66.7%	50.6%	\$1,110	72.3%	56.8%	37.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	9	100.0%	100.0%	\$1,535	100.0%	100.0%	100.0%

**First Financial Bank
El Dorado, Arkansas**

**CRA Performance Evaluation
November 4, 2024**

Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	9.5%
	Middle	0	0.0%	72.2%	\$0	0.0%	75.6%	53.1%
	Upper	1	100.0%	27.8%	\$52	100.0%	24.4%	37.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	\$52	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	100.0%	16.7%	\$120	100.0%	2.9%	50.3%
	Middle	0	0.0%	50.0%	\$0	0.0%	60.9%	33.2%
	Upper	0	0.0%	33.3%	\$0	0.0%	36.2%	16.5%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	\$120	100.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	4	8.7%	7.7%	\$283	3.9%	3.9%	9.5%
	Middle	21	45.7%	50.4%	\$3,223	44.2%	50.9%	53.1%
	Upper	21	45.7%	41.9%	\$3,785	51.9%	45.3%	37.4%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	46	100.0%	100.0%	\$7,291	100.0%	100.0%	100.0%

The bank's total penetration in moderate-income census tracts by number of loans (8.7 percent) is similar to the percentage of owner-occupied housing units in moderate-income geographies (9.5 percent) and aggregate performance (7.7 percent). Therefore, the bank's geographic distribution of HMDA loans is reasonable.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to community development needs within the Union County assessment area, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank extended four community development loans totaling \$14.2 million in this assessment area. Two of the loans promoted economic development, and two revitalized/stabilized the assessment area by providing funding for a nonprofit hospital that services the entirety of Union County and surrounding areas.

The bank also made \$1.9 million in new investments and had prior-period investments still outstanding totaling \$831,476. In addition, the bank made 113 donations totaling \$291,915; while the bank made numerous donations benefitting various organizations with a community development purpose in this assessment area, most donation dollars were to an entity promoting economic development in downtown El Dorado, Arkansas, and nearby surrounding areas.

Finally, 27 employees provided 1,113 hours of service to 22 community development organizations in this assessment area; typically, bank employees were members of advisory boards for entities providing community services and supporting economic development in Union County.

EAST ARKANSAS NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EAST ARKANSAS ASSESSMENT AREA

This assessment area includes the entirety of Cross, St. Francis, and Woodruff counties. The bank operates five offices in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	3,343	2,140	2,288	4,650	12,421
	26.9%	17.2%	18.4%	37.4%	100%
Household Population	5,458	3,076	3,287	7,062	18,883
	28.9%	16.3%	17.4%	37.4%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	5	7	3	0	15
	0.0%	33.3%	46.7%	20.0%	0.0%	100%
Family Population	0	4,262	5,339	2,820	0	12,421
	0.0%	34.3%	43.0%	22.7%	0.0%	100%
Household Population	0	6,646	8,171	4,066	0	18,883
	0.0%	35.2%	43.3%	21.5%	0.0%	100%
Business Institutions	0	680	477	293	0	1,450
	0.0%	46.9%	32.9%	20.2%	0.0%	100%

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EAST
ARKANSAS ASSESSMENT AREA**

LENDING TEST

The bank's Lending Test performance in this assessment area exceeds the bank's Lending Test performance in the state of Arkansas, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix D*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Exceeds
Geographic Distribution of Loans	Consistent
OVERALL	EXCEEDS

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area exceeds the bank's Community Development Test performance in the state of Arkansas.

During the review period, the bank made four community development loans totaling \$23.4 million that helped to revitalize/stabilize moderate-income and distressed/underserved middle-income census tracts. Additionally, the bank made investments totaling \$1.2 million. Most investments were in municipal bonds supporting school districts with a majority of students from LMI families. The bank also made 21 donations totaling \$7,320, and seven employees provided 510 hours of service to 16 community development organizations in the assessment area.

POLK COUNTY NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE POLK COUNTY ASSESSMENT AREA

This assessment area includes the entirety of Polk County. The bank operates one office in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	1,403	1,046	1,068	1,912	5,429
	25.8%	19.3%	19.7%	35.2%	100%
Household Population	2,105	1,380	1,594	3,035	8,114
	25.9%	17.0%	19.7%	37.4%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	2	5	0	0	7
	0.0%	28.6%	71.4%	0.0%	0.0%	100%
Family Population	0	1,624	3,805	0	0	5,429
	0.0%	29.9%	70.1%	0.0%	0.0%	100%
Household Population	0	2,408	5,706	0	0	8,114
	0.0%	29.7%	70.3%	0.0%	0.0%	100%
Business Institutions	0	177	477	0	0	654
	0.0%	27.1%	72.9%	0.0%	0.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE POLK COUNTY ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the state of Arkansas. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix D*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Below
OVERALL	CONSISTENT

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area is consistent with the bank's Community Development Test performance in the state of Arkansas.

During the review period, the bank made two community development loans totaling \$1.0 million that provided affordable multifamily housing in Polk County. The bank also made five donations totaling \$1,105, and four employees provided 20 hours of service to four community development organizations in the assessment area.

JONESBORO, ARKANSAS METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JONESBORO MSA ASSESSMENT AREA

Bank Structure

The bank operates two branches in this assessment area, both of which are in middle-income census tracts in Poinsett County. Since the last evaluation, the bank did not open or close any branches in this assessment area. Based on its branch network and other service delivery systems, the bank is capable of delivering financial services to the entire assessment area.

General Demographics

This assessment area includes the entirety of Craighead and Poinsett counties in northeastern Arkansas, encompassing all of the Jonesboro, Arkansas MSA. Based on 2020 ACS data, the assessment area population was 134,196. Of the 25 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 18th in deposit market share, encompassing 1.8 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products. Other particular credit needs in the assessment area, as noted by a community contact, include affordable housing. The contact noted there is a mixture of new and existing homes, but new construction has decreased recently due to the elevated interest rate environment.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	1	8	14	7	0	30
	3.3%	26.7%	46.7%	23.3%	0.0%	100%
Family Population	806	7,709	15,075	10,632	0	34,222
	2.4%	22.5%	44.1%	31.1%	0.0%	100%

As shown above, 30.0 percent of the census tracts in the assessment area are LMI geographies, but only 24.9 percent of the family population resides in these tracts. While some LMI tracts are located throughout Poinsett County, the majority of LMI areas are in Craighead County around the city of Jonesboro.

Based on 2020 ACS data, the median family income for the assessment area was \$60,922. At the same time, the median family income for the state of Arkansas as a whole was \$62,067. More recently, the FFIEC estimates the 2022 median family income for the Jonesboro, Arkansas MSA to be \$70,600. The following table displays population percentages of assessment area families by income level compared to family populations of the state of Arkansas.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	7,434	5,822	7,002	13,964	34,222
	21.7%	17.0%	20.5%	40.8%	100%
Arkansas	165,087	136,380	155,142	313,502	770,111
	21.4%	17.7%	20.2%	40.7%	100%

As shown in the table above, 38.7 percent of families within the assessment area were considered LMI, which is slightly lower than the LMI family percentage of 39.1 percent in the state of Arkansas. In contrast, the percentage of families living below the poverty level in the assessment area, 12.8 percent, is slightly higher than the 11.8 percent level in the state of Arkansas. Considering these factors, the assessment area appears to be similarly affluent to the state of Arkansas as a whole.

Housing Demographics

Housing demographic information is displayed in the following table for the assessment area and the state of Arkansas as a whole.

Housing Cost Burden						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	65.5%	30.8%	36.6%	44.2%	24.9%	12.2%
Arkansas	68.6%	31.4%	36.6%	51.0%	24.2%	14.9%
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						

The chart above indicates that low-income renters and homeowners in the assessment area are less cost burdened than the state as a whole, and moderate-income renters and homeowners are similarly cost burdened compared to the rest of the state. Per a community contact, Jonesboro is a younger community, and, as a result, many individuals lack the funds for a down payment needed to buy a home. Thus, while housing in the assessment area is more affordable compared to the state of Arkansas as a whole, homeownership may be out of reach for many LMI households.

Industry and Employment Demographics

The assessment area supports a large and diverse business community. According to the BLS, Quarterly Census of Employment and Wages, there are 58,763 employees in the assessment area (including 8,320 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are healthcare and social assistance (24.4 percent), followed by manufacturing (17.4 percent) and retail trade (14.2 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Arkansas as a whole.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2021	2022	2023
Assessment Area	3.4%	2.8%	2.8%
Craighead County	3.3%	2.7%	2.7%
Poinsett County	3.9%	3.3%	3.3%
Arkansas	4.0%	3.2%	3.3%

As shown in the table above, unemployment levels varied between each county in the assessment area. Unemployment rates in Poinsett County were similar to the state of Arkansas as a whole. However, unemployment rates in Craighead County, and the assessment area in total, were lower.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. The interviewee categorized the local economy as performing well, with increased labor participation and a growing labor force. The contact categorized the banking market as plentiful and competitive, likely due to economic growth occurring in the Jonesboro region. The contact noted that financial literacy programs represent a need for the region and that opportunities for banks to get involved are plentiful due to the presence of a mid-sized university to partner with in the city of Jonesboro.

The community contact noted that single-family new construction has slowed in the area due to the higher interest rate environment; however, the contact suggested that the local area has been less affected by recent economic trends due to its diverse economy. Further, the contact indicated that Jonesboro is a younger community, and, as a result, supplying the funds needed for a down payment on a home is the largest barrier preventing homeownership in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO MSA ASSESSMENT AREA

LENDING TEST

The distribution of loans reflects excellent penetration among borrowers of different income levels and businesses of different sizes, and the geographic distribution of loans reflects reasonable penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

The bank's loan distribution by borrower's profile is excellent, based on performance from both loan categories. First, small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2022 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: Jonesboro MSA								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	11	100.0%	54.8%	\$912	100.0%	52.0%	89.6%
	Over \$1 Million/Unknown	0	0.0%	45.2%	\$0	0.0%	48.0%	10.4%
	TOTAL	11	100.0%	100.0%	\$912	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	7	63.6%	88.6%	\$322	35.3%	34.3%	
	\$100,001–\$250,000	4	36.4%	6.9%	\$590	64.7%	21.7%	
	\$250,001–\$1 Million	0	0.0%	4.5%	\$0	0.0%	44.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	11	100.0%	100.0%	\$912	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	7	63.6%		\$322	35.3%		
	\$100,001–\$250,000	4	36.4%		\$590	64.7%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	11	100.0%		\$912	100.0%		

The bank's level of lending to small businesses is excellent. The bank originated 100.0 percent of small business loans to businesses with revenues of \$1 million or less. In comparison, assessment area demographics estimate that 89.6 percent of businesses in the assessment area had annual revenues of \$1 million or less, and the 2022 aggregate lending level to small businesses was 54.8 percent.

HMDA loans were also reviewed to determine the bank's lending levels to individuals of different income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$70,600 for the Jonesboro, Arkansas MSA as of 2022). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2022 aggregate data for the assessment area is displayed.

Borrower Distribution of HMDA Loans Assessment Area: Jonesboro MSA								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	12	10.7%	5.0%	\$1,664	7.8%	2.7%	21.7%
	Moderate	31	27.7%	16.3%	\$4,945	23.0%	12.1%	17.0%
	Middle	26	23.2%	18.7%	\$5,015	23.4%	16.7%	20.5%
	Upper	39	34.8%	31.9%	\$9,623	44.8%	43.3%	40.8%
	Unknown	4	3.6%	28.1%	\$218	1.0%	25.2%	0.0%
	TOTAL	112	100.0%	100.0%	\$21,465	100.0%	100.0%	100.0%
Refinance	Low	4	12.9%	8.4%	\$370	6.9%	4.1%	21.7%
	Moderate	6	19.4%	14.1%	\$642	11.9%	9.1%	17.0%
	Middle	9	29.0%	20.3%	\$1,725	32.0%	16.0%	20.5%
	Upper	12	38.7%	38.2%	\$2,651	49.2%	51.4%	40.8%
	Unknown	0	0.0%	19.0%	\$0	0.0%	19.3%	0.0%
	TOTAL	31	100.0%	100.0%	\$5,388	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	6.6%	\$0	0.0%	2.9%	21.7%
	Moderate	1	100.0%	8.4%	\$96	100.0%	5.3%	17.0%
	Middle	0	0.0%	16.9%	\$0	0.0%	12.3%	20.5%
	Upper	0	0.0%	54.8%	\$0	0.0%	66.9%	40.8%
	Unknown	0	0.0%	13.3%	\$0	0.0%	12.6%	0.0%
	TOTAL	1	100.0%	100.0%	\$96	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	1.5%	\$0	0.0%	0.4%	N/A
	Unknown	0	0.0%	98.5%	\$0	0.0%	99.6%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A

HMDA TOTALS	Low	16	11.1%	5.8%	2,034	7.5%	2.6%	21.7%
	Moderate	38	26.4%	15.1%	5,683	21.1%	9.6%	17.0%
	Middle	35	24.3%	18.9%	6,740	25.0%	14.1%	20.5%
	Upper	51	35.4%	34.1%	12,274	45.5%	39.2%	40.8%
	Unknown	4	2.8%	26.1%	218	0.8%	34.5%	0.0%
	TOTAL	144	100.0%	100.0%	26,949	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (11.1 percent) is below the low-income family population figure (21.7 percent) but above the 2022 aggregate lending level to low-income borrowers (5.8 percent), reflecting reasonable performance. The bank's level of lending to moderate-income borrowers (26.4 percent) is above the moderate-income family population percentage (17.0 percent) and the 2022 aggregate lending level to moderate-income borrowers (15.1 percent), reflecting excellent performance. Therefore, considering performance to both income categories, the bank's overall distribution of HMDA loans by borrower's profile is excellent.

Geographic Distribution of Loans

As noted previously, the assessment area includes one low-income and eight moderate-income census tracts, representing 30.0 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area reflects reasonable penetration throughout these LMI census tracts, based on the small business and HMDA loan categories. As previously stated, performance in the small business loan category carried the most significance in the overall rating of reasonable for geographic distribution. Furthermore, based on reviews from all material loan products, the bank had loan activity in 86.7 percent of assessment area census tracts and 66.7 percent of LMI tracts. Of the 64 total bank branches in the assessment area, the bank only operates two (3.1 percent). Additionally, as previously noted, the bank holds only 1.8 percent of the deposit market share in the assessment area. Further, the majority of the assessment area's LMI tracts are located in Craighead County, while both of the bank's branches in the assessment area are in Poinsett County, making it difficult to reach these LMI areas. Considering these factors, no conspicuous lending gaps were noted in LMI areas. This information supports the conclusion that the bank's overall geographic distribution of loans is reasonable. The following table displays 2022 small business loan activity by geography income level compared to the location of businesses throughout the bank's assessment area and 2022 small business aggregate data.

Geographic Distribution of Small Business Loans Assessment Area: Jonesboro MSA							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0%	1.2%	\$0	0.0%	1.9%	2.1%
Moderate	3	27.3%	26.0%	\$171	18.8%	28.7%	28.4%
Middle	5	45.5%	40.9%	\$448	49.1%	43.7%	42.0%
Upper	3	27.3%	30.8%	\$293	32.1%	25.3%	27.6%
Unknown	0	0.0%	1.1%	\$0	0.0%	0.4%	0.0%
TOTAL	11	100.0%	100.0%	\$912	100.0%	100.0%	100.0%

The bank did not originate any small business loans in low-income census tracts in the assessment area. However, since only 2.1 percent of small businesses in the assessment area are in low-income census tracts and aggregate lending to small businesses in low-income census tracts was just 1.2 percent, there appear to be limited opportunities for lending in these tracts. Thus, the bank's performance is considered reasonable. The bank's percentage of loans in moderate-income census tracts (27.3 percent) is slightly above the 2022 aggregate lending percentage in moderate-income census tracts (26.0 percent) and slightly below the percentage of small businesses in moderate-income census tracts (28.4 percent), representing reasonable performance. Considering performance in both income categories, the bank's overall distribution of loans by borrower's profile is reasonable.

Next, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2022 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of HMDA Loans Assessment Area: Jonesboro MSA								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	0.9%	0.6%	\$90	0.4%	0.3%	0.4%
	Moderate	11	9.8%	18.4%	\$1,656	7.7%	14.3%	20.7%
	Middle	55	49.1%	41.4%	\$9,080	42.3%	36.0%	44.0%
	Upper	45	40.2%	39.6%	\$10,639	49.6%	49.4%	34.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	112	100.0%	100.0%	\$21,465	100.0%	100.0%	100.0%

**First Financial Bank
El Dorado, Arkansas**

**CRA Performance Evaluation
November 4, 2024**

Refinance	Low	0	0.0%	0.3%	\$0	0.0%	0.4%	0.4%
	Moderate	4	12.9%	20.0%	\$666	12.4%	15.0%	20.7%
	Middle	14	45.2%	34.2%	\$2,471	45.9%	30.0%	44.0%
	Upper	13	41.9%	45.5%	\$2,251	41.8%	54.5%	34.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	31	100.0%	100.0%	\$5,388	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	17.5%	\$0	0.0%	16.0%	20.7%
	Middle	1	100.0%	38.6%	\$96	100.0%	24.4%	44.0%
	Upper	0	0.0%	44.0%	\$0	0.0%	59.6%	34.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	\$96	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	20.6%	\$0	0.0%	12.4%	17.7%
	Moderate	0	0.0%	35.3%	\$0	0.0%	57.6%	38.2%
	Middle	0	0.0%	30.9%	\$0	0.0%	18.9%	35.3%
	Upper	0	0.0%	13.2%	\$0	0.0%	11.1%	8.8%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	1	0.7%	0.8%	\$90	0.3%	2.1%	0.4%
	Moderate	15	10.4%	18.9%	\$2,322	8.6%	20.7%	20.7%
	Middle	70	48.6%	39.4%	\$11,647	43.2%	32.2%	44.0%
	Upper	58	40.3%	40.9%	\$12,890	47.8%	45.0%	34.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	144	100.0%	100.0%	\$26,949	100.0%	100.0%	100.0%

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in low-income geographies. The bank's total penetration in the assessment area's single low-income census tract by number of loans (0.7 percent) is similar to the percentage of owner-occupied housing units (0.4 percent) and aggregate performance (0.8 percent). However, the bank's performance in moderate-income census tracts by number of loans (10.4 percent) is well below the percentage of owner-occupied housing units (20.7 percent) and aggregate performance (18.9 percent), reflecting poor performance. Despite the bank's limited market share in the assessment area, considering the bank's geographic distribution of HMDA loans in both low- and moderate-income geographies (11.1 percent combined) compared to the percentage of owner-occupied housing units (21.1 percent) and performance of other lenders (19.7 percent) in LMI tracts, the bank's performance is poor.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates poor responsiveness to community development needs within this assessment area, considering the bank's capacity and the need and availability of such opportunities for community development. During the review period, the bank made four donations to organizations with a community development purpose totaling \$1,305. Further, two employees provided 36 hours of service to three community development organizations in this assessment area. There were no community development loans or investments in this assessment area during the review period.

LITTLE ROCK-NORTH LITTLE ROCK-CONWAY, ARKANSAS METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LITTLE ROCK ASSESSMENT AREA

This assessment area includes the entirety of Faulkner and Pulaski counties, which are in the north and central areas of the Little Rock MSA and are the most populous of the MSA's counties. The bank operates one office in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	31,040	19,917	23,241	50,428	124,626
	24.9%	16.0%	18.6%	40.5%	100%
Household Population	53,682	36,098	33,649	83,314	206,743
	26.0%	17.5%	16.3%	40.3%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	16	33	51	33	2	135
	11.9%	24.4%	37.8%	24.4%	1.5%	100%
Family Population	9,763	27,193	50,415	37,255	0	124,626
	7.8%	21.8%	40.5%	29.9%	0.0%	100%
Household Population	18,826	48,003	80,215	59,699	0	206,743
	9.1%	23.2%	38.8%	28.9%	0.0%	100%
Business Institutions	2,447	6,470	9,805	9,574	102	28,398
	8.6%	22.8%	34.5%	33.7%	0.4%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LITTLE ROCK ASSESSMENT AREA**LENDING TEST**

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the state of Arkansas. See the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix D*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
OVERALL	CONSISTENT

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area is consistent with the bank's Community Development Test performance in the state of Arkansas.

During the review period, the bank made three community development loans totaling \$4.4 million that either promoted economic development or helped to revitalize/stabilize a distressed or underserved middle-income census tract. Additionally, the bank made two new investments totaling \$2.0 million. One investment helped revitalize a water treatment facility that serves LMI geographies, and one was a municipal bond supporting a school district with a majority of students from LMI families. The bank also made eight donations totaling \$5,664, and three employees provided 529 hours of service to seven community development organizations in the assessment area.

MISSISSIPPI

CRA RATING FOR MISSISSIPPI:

The Lending Test is rated:

The Community Development Test is rated:

Needs to Improve

Outstanding

Needs to Improve

Major factors supporting the institution's Mississippi rating include the following:

- The distribution of loans in the Mississippi assessment areas reflects excellent penetration among individuals of different income levels (including LMI levels) and businesses of different sizes.
- The geographic distribution of loans reflects excellent dispersion throughout the Mississippi assessment areas.
- The bank's community development performance demonstrates poor responsiveness to community development needs, considering the need and availability of such opportunities for community development in the bank's Mississippi assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Mississippi assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank's ratings in the state of Mississippi reflect a composite of the bank's performance in the assessment areas evaluated with full-scope procedures throughout the state.

The bank has two assessment areas in Mississippi. One assessment area is in a nonMSA portion of central Mississippi, and the second assessment area is delineated within the larger Memphis MSA. The bank's performance in the nonMSA assessment area was evaluated using full-scope review procedures and drives the statewide rating. The Memphis assessment area was evaluated using limited-scope review procedures. Finally, as with the Arkansas rated area, small business loan performance carried more weight when making overall Lending Test performance conclusions.

To augment the evaluation of the full-scope review assessment area in Mississippi, one community contact interview was conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. The interview was with a representative from an agency specializing in economic development. Details from the interview are included in the *Description of Institution's Operations* section for the Leake County assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSISSIPPI

First Financial Bank operates two offices (11.8 percent of total branches) throughout the two CRA assessment areas in the state of Mississippi. The following table gives additional detail regarding the bank's operations within Mississippi.

Assessment Area	Offices		Deposits As of June 30, 2024		Review Procedures
	#	%	\$	%	
Leake County	1	50.0%	\$176,391	65.8%	Full Scope
Memphis	1	50.0%	\$91,681	34.2%	Limited Scope
TOTAL	2	100%	\$268,072	100%	1 – Full Scope

The bank did not open or close any branches in the state of Mississippi during the review period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

First Financial Bank's Lending Test rating for the state of Mississippi is outstanding. The bank's distribution of loans by borrower's income and revenue profile reflects excellent penetration among borrowers of different income levels and businesses of different sizes. Furthermore, the overall geographic distribution of loans reflects excellent penetration throughout the Mississippi assessment areas.

Borrower and Geographic Distribution

The bank's performance by borrower's income and revenue profile reflects excellent penetration throughout Mississippi, as displayed in the following tables.

Full-Scope Review Assessment Area	Loan Distribution by Borrower's Profile
Leake County	Excellent

Limited-Scope Review Assessment Area	Loan Distribution by Borrower's Profile
Memphis	Consistent

As displayed in the following tables, the bank's overall geographic distribution of loans reflects excellent penetration throughout Mississippi, based on the analysis of lending in the full-scope assessment area.

Full-Scope Review Assessment Area	Geographic Distribution of Loans
Leake County	Excellent

Limited-Scope Review Assessment Area	Geographic Distribution of Loans
Memphis	Below

COMMUNITY DEVELOPMENT TEST

First Financial Bank's Community Development Test rating in the state of Mississippi is Needs to Improve. The overall community development performance demonstrates poor responsiveness to the community development needs of the Mississippi assessment areas, considering the bank's capacity and the need and availability of such opportunities for community development.

Full-Scope Review Assessment Area	Community Development Performance
Leake County	Poor

Limited-Scope Review Assessment Area	Community Development Performance
Memphis	Consistent

During the review period, the bank made 22 donations to Mississippi organizations with a community development purpose totaling \$13,639. Most donations benefited schools in Mississippi assessment areas that serve students from primarily LMI families. Further, six employees provided 152 hours of service to seven community development organizations in the state of Mississippi. There were no community development loans or investments in the bank's Mississippi assessment areas during the review period.

MISSISSIPPI NONMETROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LEAKE COUNTY ASSESSMENT AREA

Bank Structure

The bank operates 1 of its 17 offices (5.9 percent) in this assessment area. The branch is located in Carthage, Mississippi, in a distressed/underserved middle-income census tract. Since the last evaluation, the bank did not open or close any branches in this assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area comprises Leake County in its entirety. This assessment area is in central nonMSA Mississippi, northeast of the city of Jackson. Based on 2020 ACS data, the assessment area population was 21,275. Of the five FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked first in deposit market share, encompassing 37.2 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products. Other particular credit needs in the assessment area, as noted by a community contact, include home improvement loans to repair an aging housing supply. Small business needs, as described by the community contact, include working capital loans for startup costs and ongoing expenses. Further, the contact indicated that many businesses lack the collateral needed to obtain financing for these types of loans.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	0	2	4	0	0	6
	0.0%	33.3%	66.7%	0.0%	0.0%	100%
Family Population	0	1,357	3,979	0	0	5,336
	0.0%	25.4%	74.6%	0.0%	0.0%	100%

As shown above, 33.3 percent of the census tracts in the assessment area are moderate-income geographies, but only 25.4 percent of the family population resides in these tracts. These moderate-income areas are in the eastern half of Leake County. The remainder of the assessment area is made up of middle-income census tracts, all of which are categorized as distressed due to poverty.

Based on 2020 ACS data, the median family income for the assessment area was \$48,272. At the same time, the median family income for nonMSA Mississippi as a whole was \$53,003. More recently, the FFIEC estimates the 2022 median family income for nonMSA Mississippi to be \$58,800. The following table displays population percentages of assessment area families by income level compared to the nonMSA Mississippi family populations.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Leake County Assessment Area	1,524	777	1,107	1,928	5,336
	28.6%	14.6%	20.8%	36.1%	100%
NonMSA Mississippi	89,246	62,630	68,326	158,072	378,274
	23.6%	16.6%	18.1%	41.8%	100%

As shown in the table above, 43.2 percent of families within the assessment area were considered LMI, which is slightly higher than LMI family percentages of 40.2 percent in nonMSA Mississippi. The percentage of families living below the poverty level in the assessment area, 18.6 percent, is also slightly higher than the 17.0 percent level in nonMSA Mississippi. Considering these factors, the assessment area income levels appear to be slightly less affluent than nonMSA Mississippi as a whole.

Housing Demographics

Housing demographic information is displayed in the following table for the assessment area and nonMSA Mississippi.

Housing Cost Burden						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	41.1%	33.3%	25.3%	42.9%	14.2%	15.0%
NonMSA Mississippi	62.2%	34.2%	37.5%	50.1%	21.9%	17.3%
<i>Cost burden is housing cost that equals 30 percent or more of household income.</i>						

According to the chart above, low- and moderate-income renters and homeowners are less cost burdened in the assessment area than nonMSA Mississippi as a whole. This data aligns with information provided by the community contact, who indicated the assessment area has been less impacted by rising housing costs than the rest of the country.

Industry and Employment Demographics

The assessment area supports a diverse business community. According to Census Bureau data, there are 4,698 employees in the assessment area. The three largest job categories in the assessment area are manufacturing (34.5 percent), followed by retail trade (16.2 percent) and healthcare and social assistance (14.6 percent). Information from a community contact affirms these trends, as the contact noted that manufacturing and retail trade were driving employment in the assessment area. The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and nonMSA Mississippi as a whole.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2021	2022	2023
Leake County Assessment Area	5.5%	4.1%	3.2%
NonMSA Mississippi	5.8%	4.1%	3.4%

As shown in the table above, unemployment levels in the assessment area are slightly lower than those of nonMSA Mississippi for most of the review period. Unemployment levels were higher in 2021 for both the assessment area and nonMSA Mississippi due to lingering impacts of the COVID-19 pandemic. Unemployment rates dropped steadily in 2022 and 2023 in the assessment area and the rest of nonMSA Mississippi as the impacts of the pandemic diminished.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. The interviewee categorized the local economy as stagnant and generally not experiencing the growth occurring in many portions of northern and southern Mississippi. The contact referenced a lack of credit and poor credit as the largest financial barrier impacting the assessment area. The contact noted that adult education programs that promote financial literacy would provide significant benefits for the community.

The community contact indicated that the assessment area has been less impacted by rising housing costs compared to the rest of the country; however, the housing stock is generally older and in need of repair. 2020 ACS data confirms that housing stock is older compared to the rest of nonMSA Mississippi. As a result, home improvement loans represent a significant need for the assessment area. In reference to small business needs, the contact noted that many businesses in the assessment area are unable to obtain loans for working capital due to insufficient collateral. As a result, the contact believes loans for startup costs and ongoing business expenses represent a significant credit need in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LEAKE COUNTY ASSESSMENT AREA

LENDING TEST

The distribution of loans reflects excellent penetration among borrowers of different income levels and businesses of different sizes, and the geographic distribution of loans reflects excellent penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

The bank's small business loan distribution performance is excellent, and HMDA loan distribution by borrower's profile is reasonable. As previously mentioned, greater weight was placed on the small business loan category when making Lending Test performance conclusions. As a result, combined performance is overall excellent. The following table shows the distribution of 2022 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: Leake County								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	17	100.0%	69.1%	\$671	100.0%	57.2%	93.1%
	Over \$1 Million/Unknown	0	0.0%	30.9%	\$0	0.0%	42.8%	6.9%
	TOTAL	17	100.0%	100.0%	\$671	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	16	94.1%	89.8%	\$561	83.6%	37.9%	
	\$100,001–\$250,000	1	5.9%	5.8%	\$110	16.4%	20.0%	
	\$250,001–\$1 Million	0	0.0%	4.4%	\$0	0.0%	42.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	17	100.0%	100.0%	\$671	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	16	94.1%		\$561	83.6%		
	\$100,001–\$250,000	1	5.9%		\$110	16.4%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	17	100.0%		\$671	100.0%		

The bank's level of lending to small businesses is excellent. The bank originated 100.0 percent of small business loans to businesses with revenues of \$1 million or less. In comparison, assessment area demographics estimate that 93.1 percent of businesses in the assessment area had annual revenues of \$1 million or less, and the 2022 aggregate lending level to small businesses was 69.1 percent.

HMDA loans were also reviewed to determine the bank's lending levels to individuals of different income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$58,800 for nonMSA Mississippi as of 2022). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2022 aggregate data for the assessment area is displayed.

Borrower Distribution of HMDA Loans Assessment Area: Leake County								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	2.8%	\$0	0.0%	1.7%	28.6%
	Moderate	2	16.7%	17.9%	\$111	6.7%	12.8%	14.6%
	Middle	4	33.3%	23.4%	\$548	32.8%	21.8%	20.7%
	Upper	5	41.7%	39.3%	\$882	52.8%	45.6%	36.1%
	Unknown	1	8.3%	16.6%	\$128	7.7%	18.2%	0.0%
	TOTAL	12	100.0%	100.0%	\$1,669	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	3.7%	\$0	0.0%	1.9%	28.6%
	Moderate	1	20.0%	9.8%	\$106	12.0%	7.1%	14.6%
	Middle	1	20.0%	22.0%	\$199	22.6%	20.3%	20.7%
	Upper	3	60.0%	51.2%	\$576	65.4%	56.7%	36.1%
	Unknown	0	0.0%	13.4%	\$0	0.0%	14.1%	0.0%
	TOTAL	5	100.0%	100.0%	\$881	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	28.6%
	Moderate	0	0.0%	25.0%	\$0	0.0%	2.3%	14.6%
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	20.7%
	Upper	0	0.0%	75.0%	\$0	0.0%	97.7%	36.1%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%

Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
HMDA TOTALS	Low	0	0.0%	3.2%	\$0	0.0%	1.9%	28.6%
	Moderate	3	17.6%	14.3%	\$217	8.5%	10.6%	14.6%
	Middle	5	29.4%	21.9%	\$747	29.3%	20.7%	20.7%
	Upper	8	47.1%	43.8%	\$1,458	57.2%	49.0%	36.1%
	Unknown	1	5.9%	16.7%	\$128	5.0%	17.9%	0.0%
	TOTAL	17	100.0%	100.0%	\$2,550	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank did not make any loans to low-income borrowers (0.0 percent) despite low-income families comprising 28.6 percent of the total assessment area population and a 2022 aggregate lending level to low-income borrowers of 3.2 percent, reflecting poor performance. The bank's level of lending to moderate-income borrowers (17.6 percent) is slightly above the moderate-income family population percentage (14.6 percent) and the 2022 aggregate lending level to moderate-income borrowers (14.3 percent), reflecting reasonable performance. Considering combined performance in both low- and moderate-income geographies (17.6 percent) compared to the percentage of owner-occupied housing units (43.2 percent) and performance of other lenders (17.5 percent) in LMI tracts, the bank's performance is overall reasonable.

Geographic Distribution of Loans

As noted previously, the assessment area includes no low-income and two moderate-income census tracts, representing 33.3 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in this assessment area reflects excellent penetration throughout these moderate-income census tracts, based on the small business and HMDA loan categories. As previously stated, performance in the small business loan category carried the most significance in the overall rating of reasonable for geographic distribution. Furthermore, based on reviews from all material loan product categories, the bank had loan activity in all assessment area census tracts. Therefore, no conspicuous lending gaps were noted in LMI areas. This information supports the conclusion that the bank's overall geographic distribution of loans is excellent. The following table displays 2022 small business loan activity by geography income level compared to the location of businesses throughout the bank's assessment area and 2022 small business aggregate data.

Geographic Distribution of Small Business Loans Assessment Area: Leake County							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	5	29.4%	24.2%	\$246	36.6%	36.3%	18.1%
Middle	12	70.6%	75.5%	\$426	63.4%	63.7%	81.9%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.0%	0.0%
TOTAL	17	100.0%	100.0%	\$672	100.0%	100.0%	100.0%

The bank's percentage of loans in moderate-income census tracts (29.4 percent) is above the estimated percentage of businesses operating inside these census tracts (18.1 percent) and above 2022 aggregate lending levels in moderate-income tracts (24.2 percent). Therefore, the bank's overall geographic distribution of small business loans is excellent.

Next, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2022 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of HMDA Loans Assessment Area: Leake County								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	5	41.7%	33.1%	\$725	43.4%	29.5%	24.6%
	Middle	7	58.3%	66.9%	\$944	56.6%	70.5%	75.4%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	12	100.0%	100.0%	\$1,669	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	3	60.0%	31.7%	\$513	58.2%	32.2%	24.6%
	Middle	2	40.0%	68.3%	\$368	41.8%	67.8%	75.4%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	5	100.0%	100.0%	\$881	100.0%	100.0%	100.0%

Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	25.0%	\$0	0.0%	12.5%	24.6%
	Middle	0	0.0%	75.0%	\$0	0.0%	87.5%	75.4%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	20.3%
	Middle	0	0.0%	100.0%	\$0	0.0%	100.0%	79.7%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	8	47.1%	31.9%	\$1,238	48.5%	30.4%	24.6%
	Middle	9	52.9%	68.1%	\$1,312	51.5%	69.6%	75.4%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	17	100.0%	100.0%	\$2,550	100.0%	100.0%	100.0%

The bank's total penetration in moderate-income census tracts by number of loans (47.1 percent) is well above the percentage of owner-occupied housing units (24.6 percent) and aggregate performance (31.9 percent). Therefore, the bank's geographic distribution of HMDA loans is excellent.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates poor responsiveness to community development needs within the Leake County assessment area, considering the bank's capacity and the need and availability of such opportunities for community development. During the review period, the bank made 22 donations to organizations with a community development purpose totaling \$13,639. Most donations benefited schools in the assessment area that serve students from primarily LMI families. Further, two employees provided 133 hours of service to four community development organizations. There were no community development loans or investments in this assessment area during the review period.

MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MEMPHIS ASSESSMENT AREA

This assessment area includes the entirety of Tate and DeSoto counties, two of the nine counties that comprise the multistate MSA. The bank operates one office in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,474	9,061	10,987	26,006	55,528
	17.1%	16.3%	19.8%	46.8%	100%
Household Population	12,502	10,194	13,248	39,033	74,977
	16.7%	13.6%	17.7%	52.1%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	10	18	19	0	47
	0.0%	21.3%	38.3%	40.4%	0.0%	100%
Family Population	0	8,705	21,559	25,264	0	55,528
	0.0%	15.7%	38.8%	45.5%	0.0%	100%
Household Population	0	12,819	30,210	31,948	0	74,977
	0.0%	17.1%	40.3%	42.6%	0.0%	100%
Business Institutions	0	1,302	3,036	3,456	0	7,794
	0.0%	16.7%	39.0%	44.3%	0.0%	100%

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS
ASSESSMENT AREA****LENDING TEST**

The bank's Lending Test performance in this assessment area is consistent with the bank's Lending Test performance in the state of Mississippi, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in *Appendix D*.

Lending Test Criteria	Performance
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Below
OVERALL	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this assessment area is consistent with the bank's Community Development Test performance in the state of Mississippi. During the review period, four employees provided 19 hours of service to three community development organizations in the assessment area. There were no community development loans, investments, or donations in this assessment area during the review period.

APPENDIX A – SCOPE OF EXAMINATION TABLES

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2022 – December 31, 2022, for small business and HMDA lending September 6, 2021 – November 3, 2024 for community development loans, investment, and service activities	
FINANCIAL INSTITUTION First Financial Bank El Dorado, Arkansas	PRODUCTS REVIEWED Small Business HMDA Small Farm	
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP N/A	PRODUCTS REVIEWED N/A

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits \$ (000s) (as of June 30, 2024)	Branches Visited	CRA Review Procedures
Union County	Arkansas	6	\$648,732	0	Full Scope
East Arkansas	Arkansas	5	\$290,106	0	Limited Scope
Polk County	Arkansas	1	\$82,172	0	Limited Scope
Jonesboro MSA	Arkansas	2	\$76,237	0	Full Scope
Little Rock	Arkansas	1	\$40,461	0	Limited Scope
Leake County	Mississippi	1	\$176,391	0	Full Scope
Memphis	Mississippi	1	\$91,681	0	Limited Scope
OVERALL		17	\$1,405,780	0	3 – Full Scope

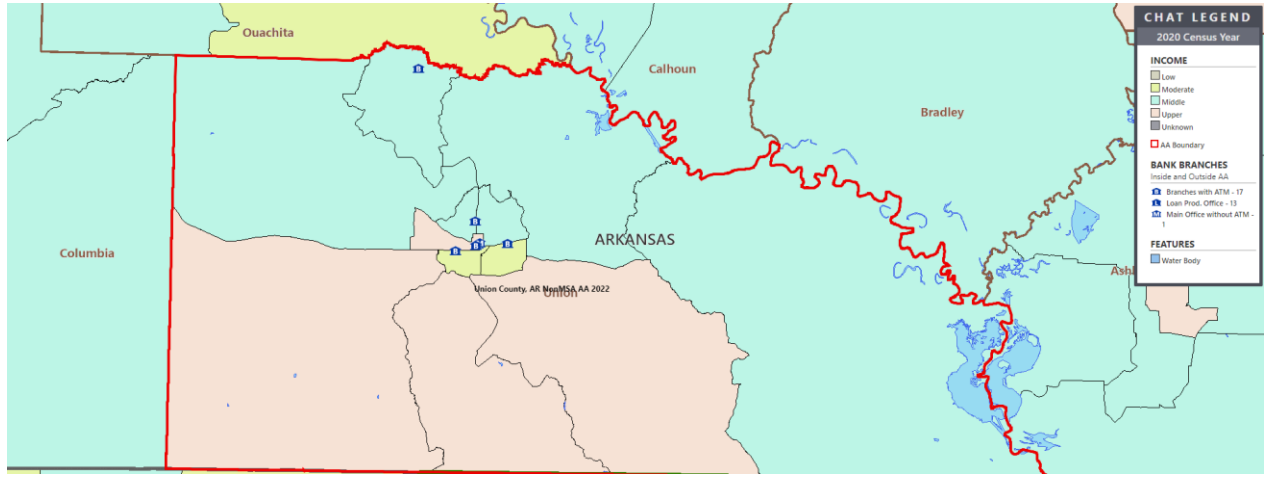
APPENDIX B – SUMMARY OF STATE RATINGS

State or Multistate MSA	Lending Test Rating	Community Development Test Rating	Overall Rating
State of Arkansas	Satisfactory	Satisfactory	Satisfactory
State of Mississippi	Outstanding	Needs to Improve	Needs to Improve

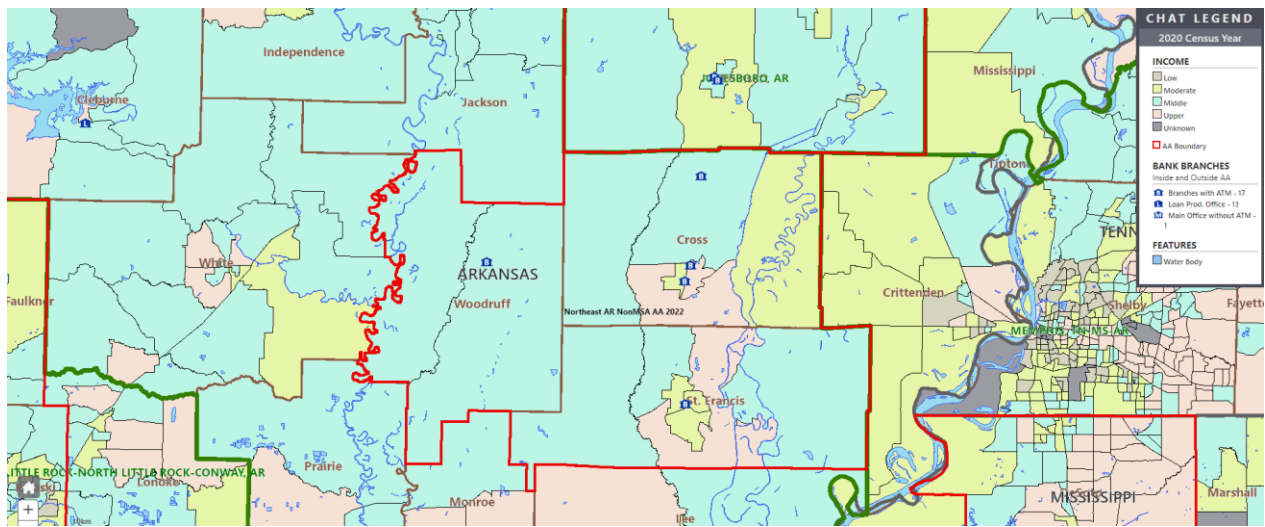
APPENDIX C – MAPS OF THE ASSESSMENT AREAS

ARKANSAS

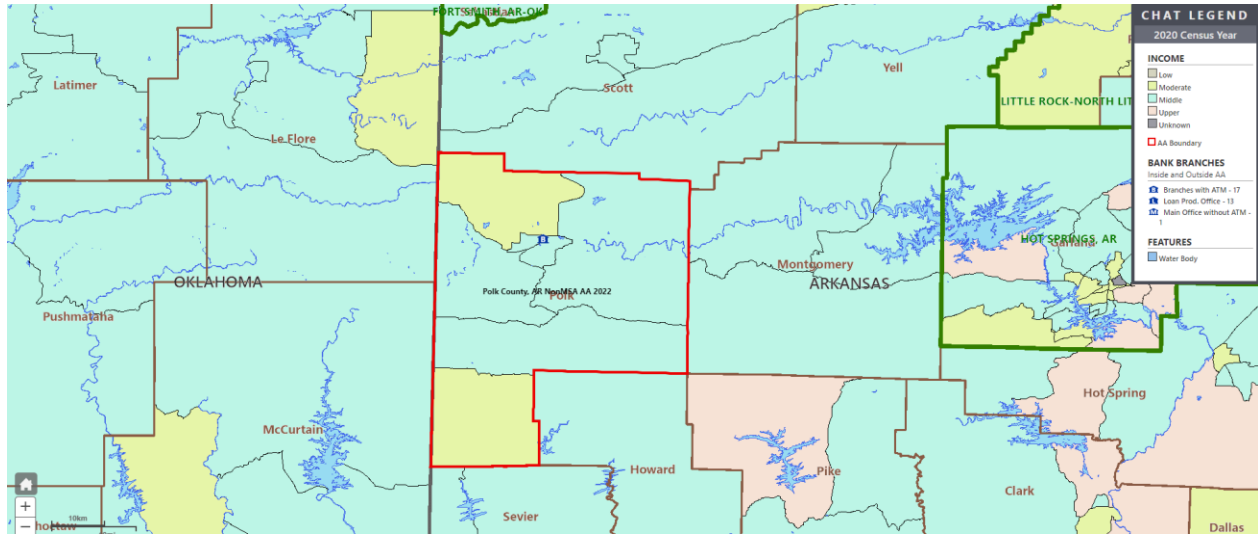
Union County Assessment Area



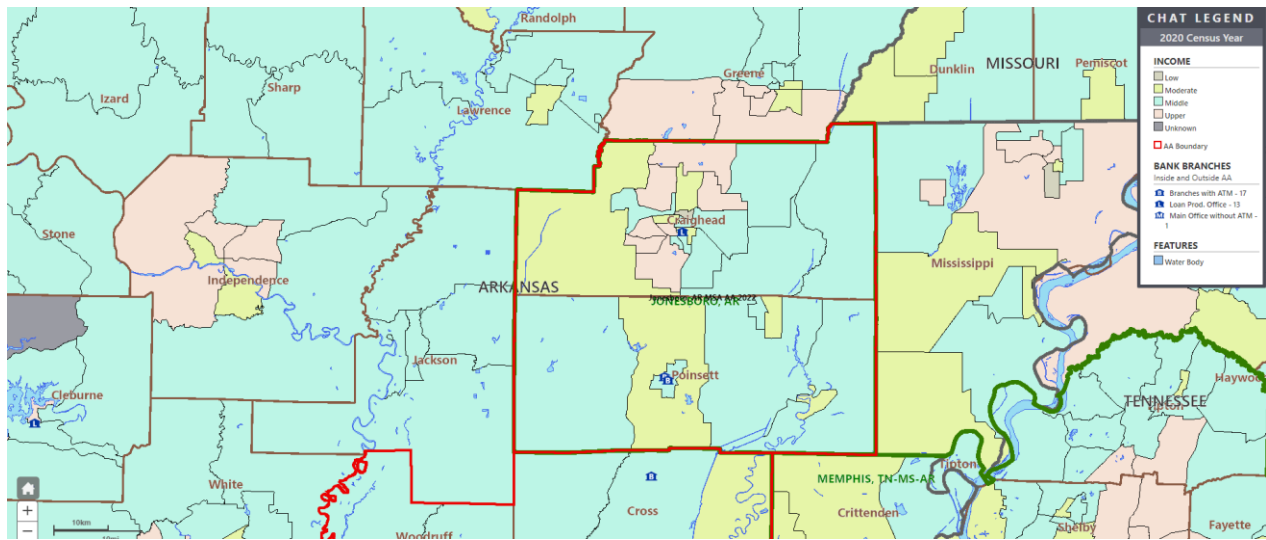
East Arkansas Assessment Area



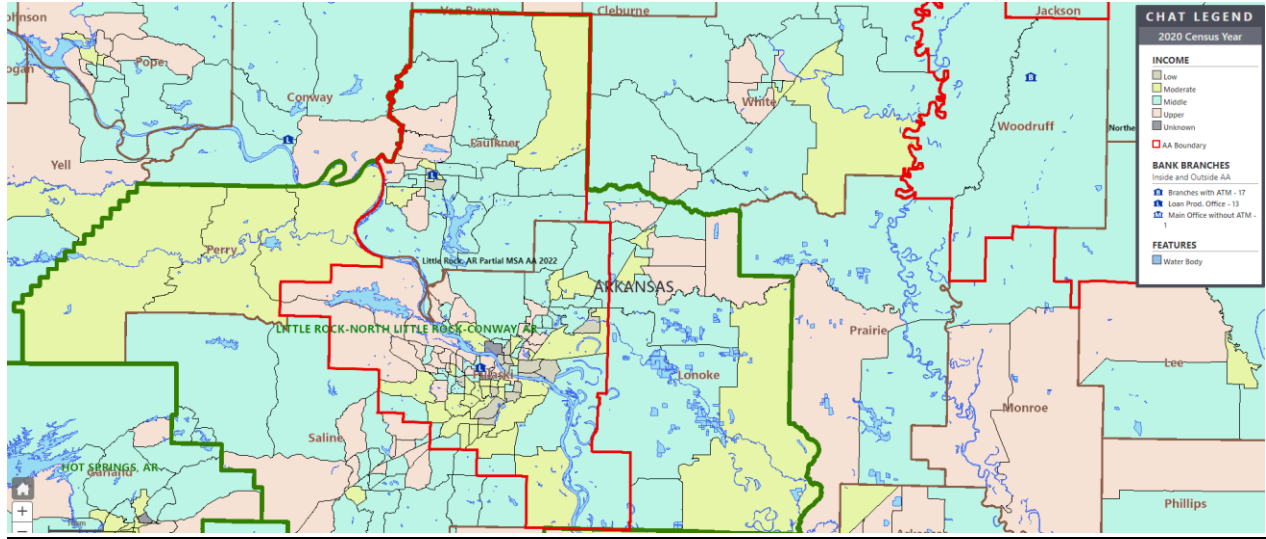
Polk County Assessment Area



Jonesboro MSA Assessment Area

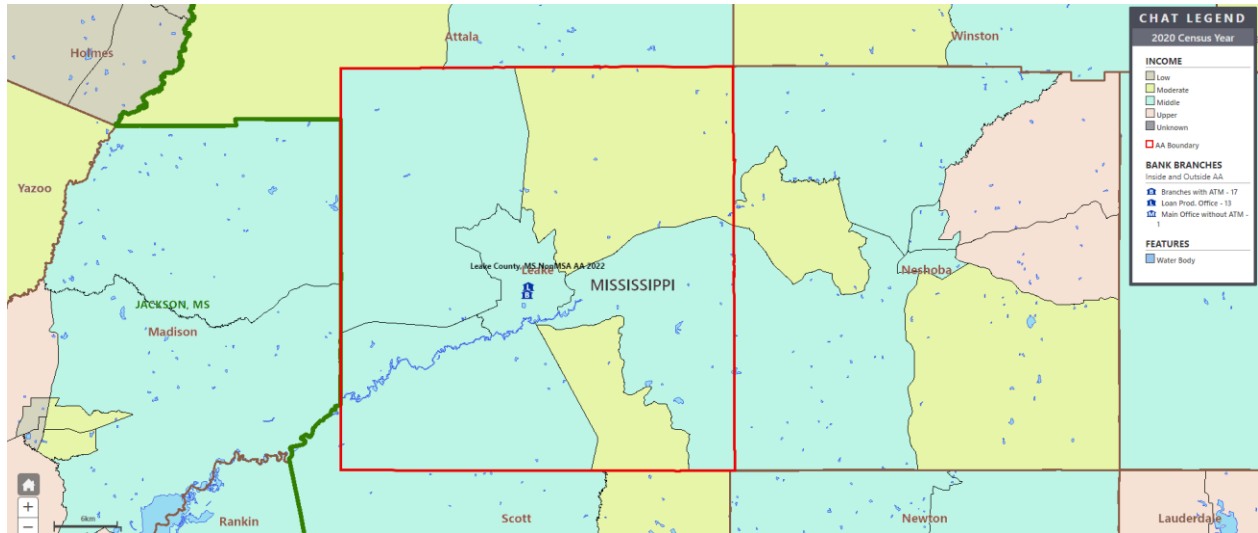


Little Rock Assessment Area

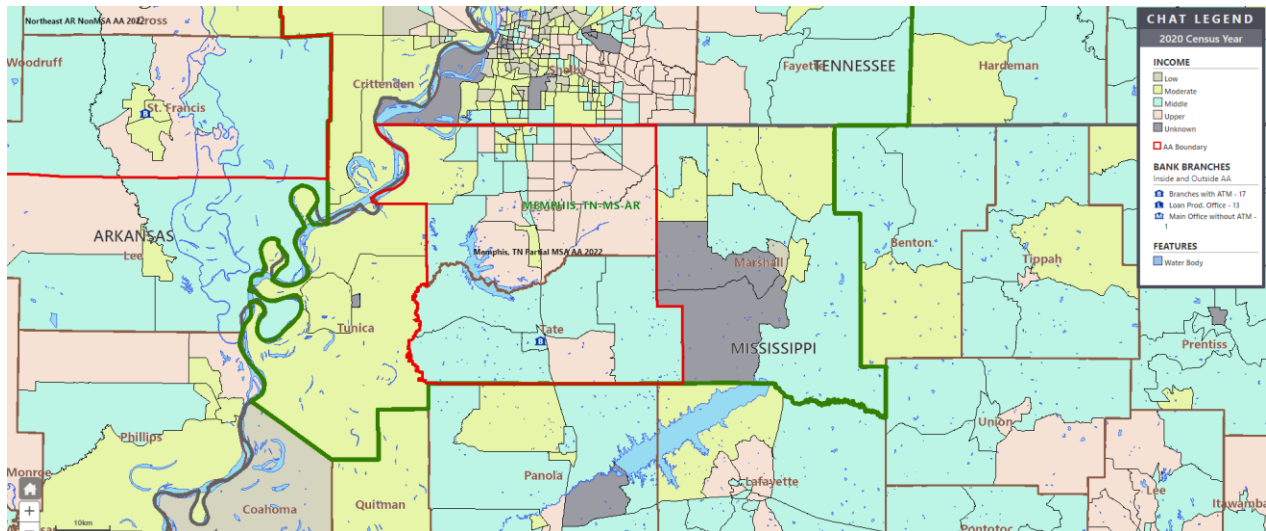


MISSISSIPPI

Leake County Assessment Area



Memphis Assessment Area



**APPENDIX D – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE
REVIEW ASSESSMENT AREAS**

Arkansas

East Arkansas Assessment Area

Small Business Loans by Revenue and Loan Size Assessment Area: East Arkansas								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	12	92.3%	49.9%	\$1,234	89.8%	43.1%	90.1%
	Over \$1 Million/ Unknown	1	7.7%	50.1%	\$140	10.2%	56.9%	9.9%
	TOTAL	13	100.0%	100.0%	\$1,374	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	8	61.5%	94.0%	\$196	14.3%	43.1%	
	\$100,001– \$250,000	4	30.8%	3.5%	\$538	39.2%	17.4%	
	\$250,001– \$1 Million	1	7.7%	2.5%	\$640	46.6%	39.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	13	100.0%	100.0%	\$1,374	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	8	66.7%		\$196	15.9%		
	\$100,001– \$250,000	3	25.0%		\$398	32.3%		
	\$250,001– \$1 Million	1	8.3%		\$640	51.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	12	100.0%		\$1,234	100.0%		

Borrower Distribution of HMDA Loans Assessment Area: East Arkansas								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	6.4%	\$0	0.0%	3.6%	26.9%
	Moderate	2	25.0%	14.6%	\$66	6.0%	10.9%	17.2%
	Middle	1	12.5%	18.4%	\$280	25.4%	18.6%	18.4%
	Upper	4	50.0%	29.2%	\$736	66.8%	36.9%	37.4%
	Unknown	1	12.5%	31.4%	\$20	1.8%	29.9%	0.0%
	TOTAL	8	100.0%	100.0%	\$1,102	100.0%	100.0%	100.0%
Refinance	Low	1	25.0%	5.4%	\$14	2.8%	2.3%	26.9%
	Moderate	1	25.0%	12.3%	\$114	23.1%	9.0%	17.2%
	Middle	0	0.0%	23.1%	\$0	0.0%	17.8%	18.4%
	Upper	1	25.0%	41.5%	\$339	68.8%	53.7%	37.4%
	Unknown	1	25.0%	17.7%	\$26	5.3%	17.3%	0.0%
	TOTAL	4	100.0%	100.0%	\$493	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	10.5%	\$0	0.0%	5.8%	26.9%
	Moderate	0	0.0%	21.1%	\$0	0.0%	13.8%	17.2%
	Middle	0	0.0%	31.6%	\$0	0.0%	27.5%	18.4%
	Upper	1	100.0%	31.6%	\$183	100.0%	32.8%	37.4%
	Unknown	0	0.0%	5.3%	\$0	0.0%	20.1%	0.0%
	TOTAL	1	100.0%	100.0%	\$183	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
HMDA TOTALS	Low	1	7.7%	6.0%	\$14	0.8%	2.5%	26.9%
	Moderate	3	23.1%	14.1%	\$180	10.1%	8.0%	17.2%
	Middle	1	7.7%	19.3%	\$280	15.7%	13.8%	18.4%
	Upper	6	46.2%	31.2%	\$1,258	70.8%	30.1%	37.4%
	Unknown	2	15.4%	29.4%	\$46	2.6%	45.6%	0.0%
	TOTAL	13	100.0%	100.0%	\$1,778	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: East Arkansas							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	4	30.8%	34.2%	\$871	63.4%	32.3%	46.9%
Middle	5	38.5%	42.8%	\$197	14.3%	47.9%	32.9%
Upper	4	30.8%	19.8%	\$306	22.3%	18.6%	20.2%
Unknown	0	0.0%	3.3%	\$0	0.0%	1.3%	0.0%
TOTAL	13	100.0%	100.0%	\$1,374	100.0%	100.0%	100.0%

Geographic Distribution of HMDA Loans Assessment Area: East Arkansas								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	2	25.0%	28.3%	\$186	16.9%	22.3%	25.6%
	Middle	4	50.0%	35.1%	\$352	31.9%	35.0%	47.5%
	Upper	2	25.0%	36.6%	\$564	51.2%	42.8%	26.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	8	100.0%	100.0%	\$1,102	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	25.0%	23.8%	\$26	5.3%	18.6%	25.6%
	Middle	0	0.0%	26.9%	\$0	0.0%	25.8%	47.5%
	Upper	3	75.0%	49.2%	\$467	94.7%	55.6%	26.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	4	100.0%	100.0%	\$493	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	31.6%	\$0	0.0%	19.8%	25.6%
	Middle	0	0.0%	26.3%	\$0	0.0%	32.8%	47.5%
	Upper	1	100.0%	42.1%	\$183	100.0%	47.4%	26.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	\$183	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	50.0%	\$0	0.0%	95.0%	49.6%
	Middle	0	0.0%	33.3%	\$0	0.0%	2.4%	38.2%
	Upper	0	0.0%	16.7%	\$0	0.0%	2.6%	12.2%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	3	23.1%	27.7%	\$212	11.9%	39.8%	25.6%
	Middle	4	30.8%	33.7%	\$352	19.8%	25.6%	47.5%
	Upper	6	46.2%	38.5%	\$1,214	68.3%	34.7%	26.9%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	13	100.0%	100.0%	\$1,778	100.0%	100.0%	100.0%

Polk County Assessment Area

Small Business Loans by Revenue and Loan Size Assessment Area: Polk County								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	7	100.0%	50.4%	\$681	100.0%	51.1%	90.8%
	Over \$1 Million/ Unknown	0	0.0%	49.6%	\$0	0.0%	48.9%	9.2%
	TOTAL	7	100.0%	100.0%	\$681	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	5	71.4%	94.4%	\$83	12.2%	44.4%	
	\$100,001– \$250,000	1	14.3%	3.4%	\$248	36.4%	21.0%	
	\$250,001– \$1 Million	1	14.3%	2.3%	\$350	51.4%	34.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	7	100.0%	100.0%	\$681	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	5	71.4%		\$83	12.2%		
	\$100,001– \$250,000	1	14.3%		\$248	36.4%		
	\$250,001– \$1 Million	1	14.3%		\$350	51.4%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	7	100.0%		\$681	100.0%		

Borrower Distribution of HMDA Loans Assessment Area: Polk County								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	5.1%	\$0	0.0%	2.7%	25.8%
	Moderate	0	0.0%	18.7%	\$0	0.0%	14.1%	19.3%
	Middle	0	0.0%	19.7%	\$0	0.0%	16.2%	19.7%
	Upper	3	75.0%	33.8%	\$402	82.7%	43.4%	35.2%
	Unknown	1	25.0%	22.7%	\$84	17.3%	23.6%	0.0%
	TOTAL	4	100.0%	100.0%	\$486	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	13.5%	\$0	0.0%	10.8%	25.8%
	Moderate	1	20.0%	14.9%	\$100	22.9%	13.2%	19.3%
	Middle	1	20.0%	17.6%	\$57	13.1%	18.6%	19.7%
	Upper	2	40.0%	40.5%	\$204	46.8%	45.1%	35.2%
	Unknown	1	20.0%	13.5%	\$75	17.2%	12.2%	0.0%
	TOTAL	5	100.0%	100.0%	\$436	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	10.0%	\$0	0.0%	5.5%	25.8%
	Moderate	0	0.0%	20.0%	\$0	0.0%	4.9%	19.3%
	Middle	0	0.0%	40.0%	\$0	0.0%	36.2%	19.7%
	Upper	0	0.0%	30.0%	\$0	0.0%	53.3%	35.2%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	50.0%	\$0	0.0%	26.3%	N/A
	Unknown	0	0.0%	50.0%	\$0	0.0%	73.7%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
HMDA TOTALS	Low	0	0.0%	7.2%	\$0	0.0%	4.6%	25.8%
	Moderate	1	11.1%	17.4%	\$100	10.8%	13.6%	19.3%
	Middle	1	11.1%	19.1%	\$57	6.2%	16.9%	19.7%
	Upper	5	55.6%	36.2%	\$606	65.7%	44.2%	35.2%
	Unknown	2	22.2%	20.1%	\$159	17.2%	20.8%	0.0%
	TOTAL	9	100.0%	100.0%	\$922	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Polk County							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	14.3%	28.6%	\$6	0.9%	31.8%	27.1%
Middle	6	85.7%	70.3%	\$674	99.1%	68.1%	72.9%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	1.1%	\$0	0.0%	0.1%	0.0%
TOTAL	7	100.0%	100.0%	\$680	100.0%	100.0%	100.0%

Geographic Distribution of HMDA Loans Assessment Area: Polk County								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	21.7%	\$0	0.0%	20.4%	28.7%
	Middle	4	100.0%	78.3%	\$486	100.0%	79.6%	71.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	4	100.0%	100.0%	\$486	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	20.0%	18.9%	\$107	24.5%	21.8%	28.7%
	Middle	4	80.0%	81.1%	\$329	75.5%	78.2%	71.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	5	100.0%	100.0%	\$436	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	50.0%	\$0	0.0%	26.2%	28.7%
	Middle	0	0.0%	50.0%	\$0	0.0%	73.8%	71.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	8.1%
	Middle	0	0.0%	100.0%	\$0	0.0%	100.0%	91.9%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	1	11.1%	22.2%	\$107	11.6%	20.8%	28.7%
	Middle	8	88.9%	77.8%	\$815	88.4%	79.2%	71.3%
	Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	9	100.0%	100.0%	\$922	100.0%	100.0%	100.0%

Little Rock Assessment Area

Small Business Loans by Revenue and Loan Size Assessment Area: Little Rock								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	2	50.0%	51.0%	\$677	76.2%	39.8%	90.8%
	Over \$1 Million/ Unknown	2	50.0%	49.0%	\$212	23.8%	60.2%	9.2%
	TOTAL	4	100.0%	100.0%	\$889	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1	25.0%	90.1%	\$71	8.0%	29.7%	
	\$100,001– \$250,000	1	25.0%	5.0%	\$141	15.9%	17.1%	
	\$250,001– \$1 Million	2	50.0%	4.9%	\$677	76.2%	53.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	4	100.0%	100.0%	\$889	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%		
	\$100,001– \$250,000	0	0.0%		\$0	0.0%		
	\$250,001– \$1 Million	2	100.0%		\$677	100.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	2	100.0%		\$677	100.0%		

Borrower Distribution of HMDA Loans Assessment Area: Little Rock								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	6.5%	\$0	0.0%	3.3%	24.9%
	Moderate	6	25.0%	18.6%	\$987	18.8%	13.6%	16.0%
	Middle	8	33.3%	18.1%	\$1,714	32.7%	16.8%	18.6%
	Upper	9	37.5%	32.0%	\$2,345	44.8%	43.0%	40.5%
	Unknown	1	4.2%	24.8%	\$191	3.6%	23.4%	0.0%
	TOTAL	24	100.0%	100.0%	\$5,237	100.0%	100.0%	100.0%
Refinance	Low	2	25.0%	7.3%	\$269	13.7%	3.7%	24.9%
	Moderate	2	25.0%	19.1%	\$209	10.7%	13.4%	16.0%
	Middle	2	25.0%	20.3%	\$517	26.4%	17.1%	18.6%
	Upper	2	25.0%	34.6%	\$962	49.2%	46.5%	40.5%
	Unknown	0	0.0%	18.7%	\$0	0.0%	19.3%	0.0%
	TOTAL	8	100.0%	100.0%	\$1,957	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	7.0%	\$0	0.0%	4.4%	24.9%
	Moderate	0	0.0%	14.9%	\$0	0.0%	9.4%	16.0%
	Middle	0	0.0%	20.7%	\$0	0.0%	15.5%	18.6%
	Upper	0	0.0%	49.1%	\$0	0.0%	59.7%	40.5%
	Unknown	0	0.0%	8.3%	\$0	0.0%	11.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.5%	\$0	0.0%	0.1%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	2.1%	\$0	0.0%	0.3%	N/A
	Unknown	0	0.0%	97.3%	\$0	0.0%	99.7%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
HMDA TOTALS	Low	2	6.3%	6.5%	\$269	3.7%	2.7%	24.9%
	Moderate	8	25.0%	17.8%	\$1,196	16.6%	10.5%	16.0%
	Middle	10	31.3%	18.5%	\$2,231	31.0%	13.2%	18.6%
	Upper	11	34.4%	33.9%	\$3,307	46.0%	35.2%	40.5%
	Unknown	1	3.1%	23.2%	\$191	2.7%	38.4%	0.0%
	TOTAL	32	100.0%	100.0%	\$7,194	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Little Rock							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0%	7.9%	\$0	0.0%	11.0%	8.6%
Moderate	1	25.0%	20.5%	\$71	8.0%	22.1%	22.8%
Middle	0	0.0%	36.4%	\$0	0.0%	33.6%	34.5%
Upper	3	75.0%	34.6%	\$818	92.0%	32.9%	33.7%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.3%	0.4%
TOTAL	4	100.0%	100.0%	\$889	100.0%	100.0%	100.0%

Geographic Distribution of HMDA Loans Assessment Area: Little Rock								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	1	4.2%	5.4%	\$104	2.0%	3.1%	5.2%
	Moderate	2	8.3%	15.5%	\$321	6.1%	11.2%	18.7%
	Middle	14	58.3%	44.8%	\$3,306	63.1%	40.4%	42.4%
	Upper	7	29.2%	34.3%	\$1,506	28.8%	45.3%	33.6%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	24	100.0%	100.0%	\$5,237	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	4.1%	\$0	0.0%	2.2%	5.2%
	Moderate	1	12.5%	15.6%	\$156	8.0%	10.7%	18.7%
	Middle	5	62.5%	47.3%	\$794	40.6%	42.7%	42.4%
	Upper	2	25.0%	32.9%	\$1,007	51.5%	44.4%	33.6%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	8	100.0%	100.0%	\$1,957	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	4.4%	\$0	0.0%	2.3%	5.2%
	Moderate	0	0.0%	13.9%	\$0	0.0%	11.4%	18.7%
	Middle	0	0.0%	38.4%	\$0	0.0%	33.6%	42.4%
	Upper	0	0.0%	43.3%	\$0	0.0%	52.7%	33.6%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	22.3%	\$0	0.0%	15.3%	11.6%
	Moderate	0	0.0%	25.5%	\$0	0.0%	18.3%	25.8%
	Middle	0	0.0%	34.0%	\$0	0.0%	28.6%	31.5%
	Upper	0	0.0%	18.1%	\$0	0.0%	37.8%	31.1%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	1	3.1%	5.2%	\$104	1.4%	5.5%	5.2%
	Moderate	3	9.4%	15.5%	\$477	6.6%	12.6%	18.7%
	Middle	19	59.4%	44.7%	\$4,100	57.0%	38.1%	42.4%
	Upper	9	28.1%	34.5%	\$2,513	34.9%	43.8%	33.6%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	32	100.0%	100.0%	\$7,194	100.0%	100.0%	100.0%

Mississippi

Memphis Assessment Area

Small Business Loans by Revenue and Loan Size Assessment Area: Memphis								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	5	100.0%	48.5%	\$371	100.0%	40.3%	94.7%
	Over \$1 Million/ Unknown	0	0.0%	51.5%	\$0	0.0%	59.7%	5.3%
	TOTAL	5	100.0%	100.0%	\$371	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	3	60.0%	93.9%	\$131	35.3%	41.0%	
	\$100,001– \$250,000	2	40.0%	3.6%	\$240	64.7%	18.1%	
	\$250,001– \$1 Million	0	0.0%	2.5%	\$0	0.0%	40.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	5	100.0%	100.0%	\$371	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	3	60.0%		\$131	35.3%		
	\$100,001– \$250,000	2	40.0%		\$240	64.7%		
	\$250,001– \$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	5	100.0%		\$371	100.0%		

Borrower Distribution of HMDA Loans Assessment Area: Memphis								
Product Type	Borrower Income Levels	2022						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	2.1%	\$0	0.0%	1.0%	17.1%
	Moderate	1	50.0%	14.3%	\$160	37.6%	10.0%	16.3%
	Middle	1	50.0%	24.1%	\$266	62.4%	22.7%	19.8%
	Upper	0	0.0%	35.2%	\$0	0.0%	41.7%	46.8%
	Unknown	0	0.0%	24.3%	\$0	0.0%	24.6%	0.0%
	TOTAL	2	100.0%	100.0%	\$426	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	7.6%	\$0	0.0%	3.9%	17.1%
	Moderate	2	50.0%	17.3%	\$195	34.7%	12.8%	16.3%
	Middle	2	50.0%	25.1%	\$367	65.3%	23.2%	19.8%
	Upper	0	0.0%	36.5%	\$0	0.0%	42.7%	46.8%
	Unknown	0	0.0%	13.5%	\$0	0.0%	17.4%	0.0%
	TOTAL	4	100.0%	100.0%	\$562	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	7.6%	\$0	0.0%	4.6%	17.1%
	Moderate	0	0.0%	17.2%	\$0	0.0%	14.6%	16.3%
	Middle	0	0.0%	24.3%	\$0	0.0%	19.2%	19.8%
	Upper	0	0.0%	46.7%	\$0	0.0%	55.7%	46.8%
	Unknown	0	0.0%	4.2%	\$0	0.0%	6.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
	Upper	0	0.0%	14.8%	\$0	0.0%	1.2%	N/A
	Unknown	0	0.0%	85.2%	\$0	0.0%	98.8%	N/A
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
HMDA TOTALS	Low	0	0.0%	4.0%	\$0	0.0%	1.7%	17.1%
	Moderate	3	50.0%	15.1%	\$355	35.9%	9.7%	16.3%
	Middle	3	50.0%	24.1%	\$633	64.1%	20.5%	19.8%
	Upper	0	0.0%	37.0%	\$0	0.0%	38.5%	46.8%
	Unknown	0	0.0%	19.8%	\$0	0.0%	29.7%	0.0%
	TOTAL	6	100.0%	100.0%	\$988	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Memphis							
Tract Income Levels	2022						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	10.4%	\$0	0.0%	13.0%	16.7%
Middle	2	40.0%	36.3%	\$146	39.2%	41.0%	39.0%
Upper	3	60.0%	52.8%	\$226	60.8%	45.9%	44.3%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.2%	0.0%
TOTAL	5	100.0%	100.0%	\$372	100.0%	100.0%	100.0%

Geographic Distribution of HMDA Loans Assessment Area: Memphis								
Product Type	Tract Income Levels	2022						
		Count			Dollars			Owner- Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	11.1%	\$0	0.0%	7.7%	12.0%
	Middle	1	50.0%	36.5%	\$160	37.6%	31.4%	37.7%
	Upper	1	50.0%	52.4%	\$266	62.4%	60.9%	50.3%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	2	100.0%	100.0%	\$426	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.5%	\$0	0.0%	9.9%	12.0%
	Middle	2	50.0%	33.4%	\$195	34.7%	26.0%	37.7%
	Upper	2	50.0%	56.2%	\$367	65.3%	64.1%	50.3%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	4	100.0%	100.0%	\$562	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.4%	\$0	0.0%	7.5%	12.0%
	Middle	0	0.0%	32.9%	\$0	0.0%	32.2%	37.7%
	Upper	0	0.0%	57.7%	\$0	0.0%	60.3%	50.3%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	33.3%	\$0	0.0%	6.3%	37.8%
	Middle	0	0.0%	33.3%	\$0	0.0%	68.4%	45.5%
	Upper	0	0.0%	33.3%	\$0	0.0%	25.2%	16.8%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	11.0%	\$0	0.0%	8.2%	12.0%
	Middle	3	50.0%	35.0%	\$355	35.9%	33.5%	37.7%
	Upper	3	50.0%	54.0%	\$633	64.1%	58.3%	50.3%
	Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
	TOTAL	6	100.0%	100.0%	\$988	100.0%	100.0%	100.0%

APPENDIX E – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely, depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

Consumer loan(s): A 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives 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 who do 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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 investments, and branch distribution).

Low-income: Individual income that is 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 metropolitan area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

Rated area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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