

# **PUBLIC DISCLOSURE**

**January 12, 2026**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Relyance Bank  
RSSD #49241**

**8500 Sheridan Road  
White Hall, Arkansas 71602**

**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.

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**INSTITUTION’S CRA RATING: This institution is rated SATISFACTORY.**

**The Lending Test is rated: Satisfactory**  
**The Community Development Test is rated: Outstanding**

Relyance 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.
- The 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.
- The 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 excellent 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 bank’s assessment areas. The bank has responded to these needs through community development loans, qualified investments and donations, and community development services.

**SCOPE OF EXAMINATION**

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) 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.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each assessment area reviewed 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, 2025.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	\$ (000s)	%	
Pine Bluff	8	38.1	818,344	61.8	Full Scope
Partial Little Rock MSA	8	38.1	358,302	27.1	Full Scope
Hot Springs MSA	4	19.0	120,796	9.1	Limited Scope
Dallas County	1	4.8	27,022	2.0	Limited Scope
<b>TOTAL<sup>1</sup></b>	<b>21</b>	<b>100</b>	<b>1,324,464</b>	<b>100</b>	<b>2 – Full Scope</b>

In light of branch structure, loan and deposit activity, and the bank’s CRA evaluation history, CRA performance in the Pine Bluff and Little Rock assessment areas was evaluated using full-scope examination procedures, as they represent the majority of the bank’s loan and deposit activity. Of the two markets, primary consideration was given to the Pine Bluff assessment area, as it contains the majority of deposit dollars and the institution is headquartered in this market. The bank’s performance in the Hot Springs and Dallas County assessment areas was evaluated using limited-scope examination procedures.

Lending performance was evaluated using small business loans and home mortgage loans, as these loan categories are considered the bank’s core business lines based on lending volume and business strategy. Therefore, 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 on commercial lending, small business lending performance carried the most significance toward the bank’s overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	June 30, 2023 – September 30, 2025
Assessment Area Concentration	January 1, 2024 – December 31, 2024
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	June 5, 2023 – January 11, 2026
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 (HMDA) and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2020 U.S. Census data; certain business demographics are based on 2024 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 \$1.1 billion to \$1.6 billion as of September 30, 2025.

<sup>1</sup> Note: In this table and others throughout this document, percentages may not total 100 percent due to rounding.

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, two 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**

The bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is a wholly owned subsidiary of Jefferson Bancshares, Inc., a single-bank holding company. Both entities are headquartered in White Hall, Arkansas. The bank's branch network consists of 21 offices (including the main office), of which 20 have automated teller machines (ATMs) on site and drive-up accessibility. Of those 20 branch locations, 18 have full-service ATMs and 2 have cash-dispensing-only ATMs. The bank also operates one standalone cash-dispensing-only ATM at a university in Pine Bluff.

In January 2025, the bank opened the Benton branch in Saline County, which increased the bank's branch presence to eight in the Little Rock assessment area. Based on the bank's branch network and other service delivery systems, such as its online and mobile 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, 2025, the bank reported total assets of \$1.5 billion. As of the same date, loans and leases outstanding were \$1.2 billion (80.0 percent of total assets), and deposits totaled \$1.3 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

<b>Distribution of Total Loans as of September 30, 2025</b>		
<b>Credit Category</b>	<b>Amount \$ (000s)</b>	<b>Percentage of Total Loans (%)</b>
Commercial Real Estate	551,958	47.0
Commercial and Industrial	219,311	18.7
1-4 Family Residential	115,067	9.8
Farm Loans	103,501	8.8
Construction and Development	77,715	6.6
Farmland	57,866	4.9
Multifamily Residential	40,535	3.5
Loans to Individuals	4,083	0.3
Total Other Loans	3,535	0.3
<b>TOTAL</b>	<b>1,173,571</b>	<b>100.0</b>

As indicated by the table above, a significant portion of the bank’s lending resources is directed to commercial real estate (47.0 percent), loans for commercial and industrial development (18.7 percent), and loans secured by 1-4 family residential properties (9.8 percent).

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on June 5, 2023.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

**LENDING TEST**

The 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 ten-quarter average, dating back to the bank’s last CRA evaluation.

<b>LTD Ratio Analysis</b>			
<b>Name</b>	<b>Headquarters</b>	<b>Asset Size \$ (000s) as of September 30, 2025</b>	<b>Average LTD Ratio (%)</b>
Relyance Bank	White Hall, Arkansas	1,486,654	88.6
Regional Banks	Jacksonville, Arkansas	1,096,256	81.4
	Batesville, Arkansas	1,580,646	91.2
	Danville, Arkansas	1,453,244	91.6

Based on data from the previous table, the bank’s level of lending is comparable to that of other banks in the region. During the review period, the bank’s quarterly LTD ratio experienced fluctuation, with a ten-quarter average ranging from 76.5 percent to 94.0 percent. The bank’s average LTD ratio outperformed one peer, while trailing the other two peers. Therefore, compared to data from regional banks, Relyance 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.

<b>Lending Inside and Outside the Assessment Areas</b>								
<b>January 1, 2024 through December 31, 2024</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b># %</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>#</b>	<b># %</b>	<b>\$ (000s)</b>	<b>\$ %</b>
Small Business	112	89.6	18,413	82.5	13	10.4	3,912	17.5
HMDA	56	78.9	12,935	43.0	15	21.1	17,162	57.0
<b>TOTAL LOANS</b>	<b>168</b>	<b>85.7</b>	<b>31,348</b>	<b>59.8</b>	<b>28</b>	<b>14.3</b>	<b>21,074</b>	<b>40.2</b>

A majority of the bank’s loans were made in the bank’s assessment areas. As shown above, 85.7 percent of the total loans were made inside the assessment areas, accounting for 59.8 percent of the dollar volume of total loans.

**Borrower and Geographic Distribution**

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

<b>Full-Scope Assessment Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Pine Bluff	Reasonable
Partial Little Rock MSA	Reasonable
<b>OVERALL</b>	<b>REASONABLE</b>

<b>Limited-Scope Assessment Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Hot Springs MSA	Consistent
Dallas County	Consistent

As displayed in the following table, the bank’s overall distribution of lending by income level of census tract reflects reasonable penetration throughout the bank’s two assessment areas evaluated using full-scope examination procedures.

<b>Full-Scope Assessment Areas</b>	<b>Geographic Distribution of Loans</b>
Pine Bluff	Reasonable
Partial Little Rock MSA	Reasonable
<b>OVERALL</b>	<b>REASONABLE</b>

<b>Limited-Scope Assessment Areas</b>	<b>Geographic Distribution of Loans</b>
Hot Springs MSA	Below
Dallas County	Below

**Responses to Complaints**

No CRA-related complaints were filed against the bank during this review period (June 5, 2023 through January 11, 2026).

**COMMUNITY DEVELOPMENT TEST**

Relyance Bank’s performance under the Community Development Test is rated Outstanding. Considering the bank’s capacity and the need and availability of such opportunities for community development in the assessment areas, the bank demonstrates excellent responsiveness to the community development needs of its assessment areas.

<b>Full-Scope Assessment Areas</b>	<b>Community Development Test Performance Conclusions</b>
Pine Bluff	Excellent
Partial Little Rock MSA	Adequate
<b>OVERALL</b>	<b>EXCELLENT</b>

<b>Limited-Scope Assessment Areas</b>	<b>Community Development Test Performance Conclusions</b>
Hot Springs MSA	Below
Dallas County	Below

The bank’s community development responsiveness is excellent given its level of community development activities. While performance varied between the two full-scope and two limited-scope assessment areas, the overall Community Development Test rating was based most heavily on performance in the Pine Bluff assessment area.

<b>Total Community Development Activities Inside Assessment Areas</b>			
<b>June 5, 2023 – January 11, 2026</b>			
<b>Community Development Component</b>	<b>#</b>		<b>\$</b>
Loans	12		23.5 million
Investments, Current and Prior	16		7.4 million
Current Period	-		-
Prior Period, Still Outstanding	16		7.4 million
Donations	66		280,273
Services	110 services	1,740 hours	40 organizations

During the review period, the bank made 12 community development loans in its assessment areas totaling approximately \$23.5 million. Of those loans, two were for affordable housing developments, six were for economic development, and four were to revitalize or stabilize LMI geographies or distressed middle-income geographies in rural areas.

The bank also made community development donations and retained prior-period investments in its assessment areas totaling \$7.7 million. This amount included 16 continuing investments made in a prior review period totaling \$7.4 million and 66 donations totaling \$280,273. All of the investments were municipal bonds—14 issued by qualifying school districts for community services and 2 issued by local government for economic development. Furthermore, the 66 donations were to 46 separate organizations, with 2 toward affordable housing initiatives, 4 for economic development, 3 for revitalization and stabilization, and the remaining for community services.

During the review period, bank personnel used financial expertise to log 110 service activities to 40 different community development organizations within the bank's assessment areas. Service activities included delivering financial education in schools that primarily serve LMI families and providing financial expertise to community service and economic development organizations as board members.

In addition to adequately meeting the community development needs of its assessment areas, the bank had community development loans and investments outside its assessment areas but still within the broader statewide or regional areas. The bank made nine community development loans totaling \$30.3 million, as well as \$12.7 million in investments and \$10,000 in donations to various organizations outside its assessment areas but within Arkansas. The bank also made a \$25,000 grant in partnership with the Federal Home Loan Bank Special Needs Assistance Program to assist with affordable housing initiatives in Arkansas.

#### **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 NONMETROPOLITAN STATEWIDE AREA**

*(Full-Scope Review)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PINE BLUFF ASSESSMENT AREA**

#### **Bank Structure**

The bank operates 8 of its 21 offices (38.1 percent) in this assessment area. While none of these branches are located in LMI geographies, three are located near moderate-income census tracts. Overall, the bank operates two branches in distressed middle-income census tracts (distressed due to elevated levels of poverty), five branches in upper-income census tracts, and one branch in a census tract designated as unknown income. Since the last examination, 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 Pine Bluff assessment area is composed of Jefferson and Lincoln counties in their entireties. This assessment area is located in southeastern Arkansas, which is in the Arkansas Delta region. As of the 2020 U.S. Census, the assessment area population was 80,201, representing a decline of 8.5 percent since 2015 (87,610). The declining population in Pine Bluff led to the area losing its official census designation as a metropolitan statistical area (MSA) effective January 2024. Of the seven FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked second in deposit market share with 29.3 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products. In particular, as noted primarily by the community contact, access to startup capital was identified as a need for local entrepreneurs. The housing stock in the area was also described as older, with access to home improvement loans identified as an additional credit need.

**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.

<b>Assessment Area Demographics by Geography Income Level</b>						
<b>Dataset</b>	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown-</b>	<b>TOTAL</b>
Census Tracts	0	8	11	7	2	<b>28</b>
	0.0%	28.6%	39.3%	25.0%	7.1%	<b>100.0%</b>
Family Population	0	3,727	7,755	6,668	983	<b>19,133</b>
	0.0%	19.5%	40.5%	34.9%	5.1%	<b>100.0%</b>

As shown above, 28.6 percent of the census tracts in the assessment area are moderate-income geographies, but only 19.5 percent of the family population resides in these tracts. All of the moderate-income census tracts are in Jefferson County, primarily centered around the city of Pine Bluff.

Based on the 2020 U.S. Census data, the median family income for the assessment area and nonMSA Arkansas was \$52,885 and \$53,596, respectively. More recently, the FFIEC estimates the 2024 median family income for nonMSA Arkansas to be \$64,800. The following table displays population percentages of assessment area families by income level compared to nonMSA Arkansas.

<b>Family Population by Income Level</b>					
<b>Dataset</b>	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>TOTAL</b>
Assessment Area	4,379	3,339	3,638	7,777	<b>19,133</b>
	22.9%	17.5%	19.0%	40.6%	<b>100.0%</b>
NonMSA Arkansas	65,329	57,611	63,457	129,420	<b>315,817</b>
	20.7%	18.2%	20.1%	41.0%	<b>100.0%</b>

As shown in the table above, 40.4 percent of families within the assessment area were considered LMI, which is slightly higher than nonMSA Arkansas. The percentage of families living below the poverty level in the assessment area, 17.4 percent, exceeds the 13.7 percent level in nonMSA Arkansas. Considering these factors, the assessment area income levels appear to be considerably less affluent than nonMSA Arkansas.

**Housing Demographics**

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be less affordable than nonMSA Arkansas and the state overall.

<b>Housing Cost Burden (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	63.4	49.9	39.0	58.7	25.6	15.9
NonMSA Arkansas	63.5	32.8	35.5	52.1	24.0	15.7

*Cost burden is housing cost that equals 30 percent or more of household income.*

According to the table above, low-income renters in the assessment area (63.4 percent) and nonMSA Arkansas (63.5 percent) are similarly cost burdened. Conversely, the cost burden for moderate-income renters in the assessment area (49.9 percent) is significantly greater in comparison to nonMSA Arkansas (32.8 percent). The median gross monthly rent figure in the assessment area is \$734, which is \$90 higher than the nonMSA Arkansas figure (\$644). However, as detailed in the previous section, assessment area income levels were lower overall compared to nonMSA Arkansas; these circumstances reflect the higher percentage of all renters in the assessment area facing a higher cost burden (39.0 percent).

Homeowners across each area are similarly cost burdened, ranging from 15.7 percent to 15.9 percent; however, low-income owners are significantly more cost burdened in the assessment area (58.7 percent) compared to nonMSA Arkansas (52.1 percent). Moderate-income borrowers are similarly strained across each area, ranging from 24.0 percent to 25.6 percent. The median age of the housing stock in the assessment area (48) is significantly older than the housing stock in nonMSA Arkansas (35). Such information suggests that although homeownership affordability in the assessment area initially appears similar to comparison data based on home values, there may be increased housing costs in the assessment area considering repairs tied to older housing stock. Such circumstances support the community contact statements identifying home improvement loans as an important credit need in the assessment area.

**Industry and Employment Demographics**

The assessment area supports a diverse business community, including a strong small business sector, as evidenced by the Dun & Bradstreet data indicating that 91.5 percent of assessment area businesses have gross annual revenues of \$1 million or less. Furthermore, according to the U.S. Department of Labor, Bureau of Labor Statistics (BLS), there are 28,004 employees in the assessment area (including 7,929 governmental employees).

By percentage of nongovernmental employees, the three largest job categories in the assessment area are manufacturing (21.8 percent), followed by retail trade (14.5 percent) and administrative and waste services (7.2 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and nonMSA Arkansas as a whole.

<b>Unemployment Levels (%)</b>			
<b>Dataset</b>	<b>Time Period (Annual Average)</b>		
	<b>2023</b>	<b>2024</b>	<b>2025 (Jan.–May)</b>
Assessment Area	4.5	5.0	5.3
NonMSA Arkansas	3.7	4.1	4.3

As shown in the table above, unemployment levels were consistently higher in the assessment area when compared to nonMSA Arkansas, though both areas had a steadily increasing trend during the review period.

**Community Contact Information**

To augment the analysis of the bank’s performance and data relevant to the assessment area, one interview was completed with a community contact who specializes in community and economic development for the local government. The contact mentioned that an area college attracts a younger demographic; however, the overall population was described as declining. Health care, manufacturing, and education were named as the largest industries in the area, attracting residents in the surrounding counties for employment purposes.

The small business community was described as plentiful, with a strong presence of family- and minority-owned businesses; however, a lack of access to capital was noted as a credit need for business owners. Commercial buildings and local housing stock were described as aging, with a general need for rehabilitation.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PINE BLUFF ASSESSMENT AREA**

LENDING TEST

The bank’s overall distribution of loans by borrower’s income/revenue profile reflects reasonable penetration among businesses of different revenue sizes and borrowers of different income levels. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout the Pine Bluff assessment area.

**Loan Distribution by Borrower’s Profile**

Overall, the bank’s loan distribution by borrower’s profile is reasonable, based on performance from both loan categories reviewed. The bank’s small business loans were reviewed to determine the bank’s lending levels to businesses of different sizes. The following table shows the distribution of 2024 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate lending data.

Small Business Loans by Revenue and Loan Size Assessment Area: Pine Bluff								
Business Revenue and Loan Size		2024						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	30	65.2	59.6	2,849	60.0	49.1	91.5
	Over \$1 Million/ Unknown	16	34.8	40.4	1,898	40.0	50.9	8.5
	<b>TOTAL</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>4,747</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less	33	71.7	94.3	1,365	28.8	42.6	
	\$100,001–\$250,000	8	17.4	3.6	1,217	25.6	20.4	
	\$250,001–\$1 Million	5	10.9	2.1	2,165	45.6	37.0	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	<b>TOTAL</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>4,747</b>	<b>100.0</b>	<b>100.0</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	23	76.7		938	32.9		
	\$100,001–\$250,000	4	13.3		579	20.3		
	\$250,001–\$1 Million	3	10.0		1,332	46.8		
	Over \$1 Million	0	0.0		0	0.0		
	<b>TOTAL</b>	<b>30</b>	<b>100.0</b>		<b>2,849</b>	<b>100.0</b>		

The bank’s level of lending to small businesses is reasonable. The bank originated the majority of its small business loans (65.2 percent) to businesses with revenues of \$1 million or less. In comparison, assessment area demographics estimate that 91.5 percent of businesses in the

assessment area had annual revenues of \$1 million or less, and the 2024 aggregate lending level to small businesses is 59.6 percent.

Next, HMDA loans were reviewed to determine the bank’s lending levels to borrowers 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 (\$64,800 for nonMSA Arkansas as of 2024). 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, 2024 aggregate data for the assessment area is displayed.

<b>Borrower Distribution of HMDA Loans</b>								
<b>Assessment Area: Pine Bluff</b>								
<b>Product Type</b>	<b>Borrower Income Levels</b>	<b>2024</b>						
		<b>Count</b>			<b>Dollars</b>			<b>Families</b>
		<b>Bank</b>		<b>HMDA Aggregate</b>	<b>Bank</b>		<b>HMDA Aggregate</b>	
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	
<b>Home Purchase</b>	Low	0	0.0	4.2	0	0.0	2.2	22.9
	Moderate	0	0.0	13.8	0	0.0	9.6	17.5
	Middle	0	0.0	16.9	0	0.0	16.1	19.0
	Upper	4	40.0	26.2	543	34.8	32.7	40.6
	Unknown	6	60.0	39.0	1,016	65.2	39.4	0.0
	<b>TOTAL</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,559</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance</b>	Low	0	0.0	4.5	0	0.0	1.7	22.9
	Moderate	1	33.3	10.9	71	26.9	6.1	17.5
	Middle	0	0.0	22.7	0	0.0	17.7	19.0
	Upper	1	33.3	31.8	131	49.6	30.9	40.6
	Unknown	1	33.3	30.0	62	23.5	43.5	0.0
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>264</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement</b>	Low	0	0.0	7.0	0	0.0	3.0	22.9
	Moderate	2	66.7	14.0	128	68.1	11.0	17.5
	Middle	1	33.3	26.3	60	31.9	23.1	19.0
	Upper	0	0.0	38.6	0	0.0	38.2	40.6
	Unknown	0	0.0	14.0	0	0.0	24.8	0.0
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily</b>	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	1	50.0	28.6	153	13.2	9.6	N/A
	Unknown	1	50.0	71.4	1,005	86.8	90.4	N/A
	<b>TOTAL</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,158</b>	<b>100.0</b>	<b>100.0</b>	<b>N/A</b>

<b>HMDA TOTALS</b>	Low	0	0.0	4.4	0	0.0	2.0	22.9
	Moderate	3	16.7	12.9	199	6.3	8.5	17.5
	Middle	1	5.6	18.3	60	1.9	16.1	19.0
	Upper	6	33.3	27.8	827	26.1	31.7	40.6
	Unknown	8	44.4	36.6	2,083	65.7	41.7	0.0
	<b>TOTAL</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>3,169</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

As displayed in the preceding table, the bank did not extend any loans to low-income borrowers, which is below both the low-income family population figure (22.9 percent) and the 2024 aggregate lending level to low-income borrowers (4.4 percent), reflecting poor performance. In contrast, the bank’s level of lending to moderate-income borrowers (16.7 percent) is similar to the moderate-income family population percentage (17.5 percent) and exceeds the 2024 aggregate lending level to moderate-income borrowers (12.9 percent), reflecting reasonable performance. Therefore, considering performance to both income categories, the bank’s overall distribution of loans by borrower’s profile is reasonable.

**Geographic Distribution of Loans**

As noted previously, the assessment area includes zero low-income and eight moderate-income census tracts, representing 28.6 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 loan and HMDA loan categories. As previously stated, performance in the small business loan category carried the most significance when determining overall performance. Furthermore, based on reviews from both loan categories, the bank had loan activity in 82.1 percent of all assessment area census tracts, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank’s overall geographic distribution of loans is reasonable. The following table displays the geographic distribution of 2024 small business loan activity by geography income level compared to the location of businesses throughout the bank’s assessment area and 2024 small business aggregate lending.

<b>Geographic Distribution of Small Business Loans</b>							
<b>Assessment Area: Pine Bluff</b>							
<b>Tract Income Levels</b>	<b>2024</b>						
	<b>Count</b>			<b>Dollars</b>			<b>Businesses</b>
	<b>Bank</b>		<b>Aggregate</b>	<b>Bank</b>		<b>Aggregate</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	21.7	19.3	1,788	37.7	17.1	25.4
Middle	13	28.3	36.4	1,198	25.2	39.1	36.0
Upper	22	47.8	41.6	1,745	36.8	42.7	35.4
Unknown	1	2.2	2.7	15	0.3	1.1	3.3
<b>TOTAL</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>4,746</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

As there are not any low-income geographies in the assessment area, analysis was based on lending in moderate-income geographies. The bank’s level of lending in moderate-income census tracts (21.7 percent) is comparable to the 2024 aggregate lending percentage of 19.3 percent and trails the percentage of small businesses in moderate-income census tracts (25.4 percent), representing reasonable performance. Therefore, the bank’s overall geographic distribution of small business loans is reasonable.

Next, the following table displays the geographic distribution of 2024 HMDA loans compared to housing demographics and aggregate performance for the assessment area.

<b>Geographic Distribution of HMDA Loans</b>								
<b>Assessment Area: Pine Bluff</b>								
<b>Product Type</b>	<b>Tract Income Levels</b>	<b>2024</b>						
		<b>Count</b>			<b>Dollars</b>			<b>Owner-Occupied Units</b>
		<b>Bank</b>		<b>HMDA Aggregate</b>	<b>Bank</b>		<b>HMDA Aggregate</b>	
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
<b>Home Purchase</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	6.9	0	0.0	4.4	15.9
	Middle	5	50.0	38.1	911	58.4	33.6	38.1
	Upper	5	50.0	50.6	648	41.6	59.4	41.5
	Unknown	0	0.0	4.4	0	0.0	2.5	4.5
	<b>TOTAL</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>1,559</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	13.6	0	0.0	6.5	15.9
	Middle	2	66.7	30.5	193	73.1	32.4	38.1
	Upper	1	33.3	51.8	71	26.9	59.6	41.5
	Unknown	0	0.0	4.1	0	0.0	1.5	4.5
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>264</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	33.3	31.6	26	13.8	22.1	15.9
	Middle	1	33.3	26.3	60	31.9	25.3	38.1
	Upper	1	33.3	35.1	102	54.3	43.9	41.5
	Unknown	0	0.0	7.0	0	0.0	8.6	4.5
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	50.0	28.6	153	13.2	14.6	38.4
	Middle	0	0.0	57.1	0	0.0	56.4	47.1
	Upper	1	50.0	14.3	1,005	86.8	29.0	12.0
	Unknown	0	0.0	0.0	0	0.0	0.0	2.4
	<b>TOTAL</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,158</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>HMDA TOTALS</b>	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	2	11.1	10.4	179	5.6	5.6	15.9
	Middle	8	44.4	35.8	1,164	36.7	33.9	38.1
	Upper	8	44.4	49.4	1,826	57.6	58.1	41.5
	Unknown	0	0.0	4.4	0	0.0	2.3	4.5
	<b>TOTAL</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>3,169</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in moderate-income geographies. The bank’s total penetration of moderate-income census tracts by number of loans (11.1 percent) trails the percentage of owner-occupied housing units in moderate-income census tracts (15.9 percent) yet exceeds 2024 HMDA aggregate lending levels of 10.4 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 Pine Bluff 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 eight community development loans totaling \$9.9 million in this assessment area. These loans helped provide revitalization and stabilization efforts in LMI and distressed middle-income geographies and supported the creation and maintenance of permanent jobs.

The bank maintained \$3.9 million in ongoing investments, all of which consisted of municipal bonds to local schools with a majority of students eligible for free- and reduced-lunch or meeting Pell grant requirements. Two of the municipal bonds also helped finance local government projects with economic development purposes. Additionally, the bank made 22 community development donations totaling \$155,972 in this assessment area. Notably, the bank donated a total of \$105,022 to an organization that specializes in community services to increase accessibility and availability of resources to LMI individuals and families. The bank also donated \$25,000 to improve the athletic division for a local college serving a majority of LMI students. Finally, bank personnel provided 72 services to 27 different community development organizations in this assessment area.

**LITTLE ROCK-NORTH LITTLE ROCK-CONWAY,  
ARKANSAS MSA**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LITTLE ROCK ASSESSMENT AREA**

**Bank Structure**

The bank operates 8 of its 21 offices (38.1 percent) in this assessment area. Overall, the bank operates three branches in middle-income census tracts and five branches in upper-income census tracts. While none of these branches are located in LMI geographies, three are located near moderate-income census tracts. Since the last examination, the bank opened the Benton branch in January 2025, increasing its branch presence in Saline County.

**General Demographics**

The Little Rock assessment area is composed of Grant, Pulaski, and Saline counties, which are three of the six counties in the Little Rock-North Little Rock-Conway, Arkansas MSA (Little Rock MSA). The assessment area is located in central Arkansas along the Arkansas River. As of the 2020 U.S. Census, the assessment area population was 540,499, representing an increase of 3.5 percent since 2015 (522,350). Of the 36 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 13<sup>th</sup> in deposit market share, encompassing 1.1 percent of total deposit dollars.

Credit needs in the assessment area include a mix of consumer and business loan products. The community contact specifically noted small business loans and financial education as credit needs in the assessment area.

**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	14	30	58	38	2	142
	9.9%	21.1%	40.8%	26.8%	1.4%	100.0%
Family Population	8,556	25,053	55,821	42,649	0	132,079
	6.5%	19.0%	42.3%	32.3%	0.0%	100.0%

As shown above, 31.0 percent of the census tracts in the assessment area are LMI geographies, but only 25.5 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in Pulaski County around the city of Little Rock.

Based on 2020 U.S. Census data, the median family income for the assessment area was \$73,078. At the same time, median family income for the Little Rock MSA and the state of Arkansas as a whole were \$72,289 and \$62,067, respectively. More recently, the FFIEC estimates the 2024 median family income for the Little Rock MSA to be \$86,400. The following table displays population percentages of assessment area families by income level compared to the full Little Rock MSA and the state of Arkansas family populations.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	30,072	21,233	25,556	55,218	<b>132,079</b>
	22.8%	16.1%	19.4%	41.8%	<b>100.0%</b>
Arkansas	164,819	136,219	155,068	314,005	<b>770,111</b>
	21.4%	17.7%	20.1%	40.8%	<b>100.0%</b>

As shown in the table above, 38.9 percent of families within the assessment area were considered LMI, which is similar to the LMI family percentage in the state of Arkansas (39.1 percent). The percentage of families living below the poverty level in the assessment area (10.4 percent) is below the 11.8 percent state level. Considering these factors, including a higher median family income level and lower percentage of families living below the poverty level, the assessment area appears to be slightly more affluent than the state of Arkansas as a whole.

**Housing Demographics**

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be less affordable than in the state overall.

Housing Cost Burden (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	75.7	40.1	41.3	58.7	29.0	16.8
Arkansas	69.8	35.3	37.3	53.0	25.2	15.3

*Cost burden is housing cost that equals 30 percent or more of household income.*

According to the table above, renters in the assessment area have higher cost burdens compared to all renters in Arkansas. This is further supported by the assessment area having a higher median rent figure (\$866) compared to the figure for the state of Arkansas (\$760). Similarly, the table shows that homeowners in the assessment area face a higher cost burden compared to homeowners at the state level. Therefore, it appears as though higher housing costs in the assessment area outpace the relatively higher assessment area income levels as compared to the entire state of Arkansas.

**Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by the Dun & Bradstreet data indicating that 90.8 percent of assessment area businesses have gross annual revenues of \$1 million or less. Furthermore, according to the BLS, there are 298,141 employees in the assessment area (including 57,045 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are health care and social assistance (18.7 percent), followed by retail trade (13.1 percent) and accommodation and food services (10.0 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Arkansas.

<b>Unemployment Levels (%)</b>			
<b>Dataset</b>	<b>Time Period (Annual Average)</b>		
	<b>2023</b>	<b>2024</b>	<b>2025 (Jan.–May)</b>
Assessment Area	3.0	3.3	3.5
Arkansas	3.1	3.5	3.7

As shown in the table above, both areas displayed an increasing trend throughout the review period; however, unemployment was consistently lower in the assessment area.

**Community Contact Information**

For the Little Rock assessment area, one interview with a community contact who specializes in economic development was referenced as part of this evaluation. The community contact described Saline County as affluent, with local geographies ranging from moderate to upper income. Affordable housing developments were noted as occurring, along with the city seeking to bring in more multifamily housing to the area. The contact described housing stock in Saline as newer; however, there are homes in the area that could benefit from rehabilitation. The small business environment was described as vibrant and strong, with rapid growth; however, a lack of commercial property availability and access to startup capital was mentioned as credit needs for entrepreneurs. Financial education programs was named as a credit need for the area to inform borrowers about available lending products.

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

**LENDING TEST**

The bank’s overall distribution of loans by borrower’s income/revenue profile reflects reasonable penetration among businesses of different revenue sizes and borrowers of different income levels. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout the Little Rock assessment area.

**Loan Distribution by Borrower’s Profile**

Overall, the bank’s loan distribution by borrower’s profile is reasonable, based on performance from both loan categories reviewed. While the bank’s performance under the small business loan category is reasonable and HMDA loan distribution by borrower’s profile is poor, greater significance is placed on performance in the small business loan category given the bank’s emphasis on commercial lending.

The bank’s small business loans were reviewed to determine the bank’s lending levels to businesses of different sizes. The following table shows the distribution of 2024 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate lending data.

Small Business Loans by Revenue and Loan Size								
Assessment Area: Little Rock								
Business Revenue and Loan Size		2024						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	27	47.4	49.7	5,485	41.6	39.2	90.8
	Over \$1 Million/ Unknown	30	52.6	50.3	7,702	58.4	60.8	9.2
	<b>TOTAL</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,187</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less	26	45.6	91.2	1,184	9.0	34.9	
	\$100,001–\$250,000	13	22.8	4.9	1,990	15.1	19.2	
	\$250,001–\$1 Million	18	31.6	3.9	10,013	75.9	46.0	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	<b>TOTAL</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,187</b>	<b>100.0</b>	<b>100.0</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	12	44.4		453	8.3		
	\$100,001–\$250,000	8	29.6		1,177	21.5		
	\$250,001–\$1 Million	7	25.9		3,855	70.3		
	Over \$1 Million	0	0.0		0	0.0		
	<b>TOTAL</b>	<b>27</b>	<b>100.0</b>		<b>5,485</b>	<b>100.0</b>		

The bank’s level of lending to small businesses is reasonable. Assessment area demographics estimate that 90.8 percent of businesses in the assessment area had annual revenues of \$1 million or less. The bank originated 47.4 percent of its small business loans to businesses with revenues of \$1 million or less, which is similar to aggregate lending performance of 49.7 percent. Therefore, the bank’s level of lending to small businesses is reasonable.

Next, HMDA loans were reviewed to determine the bank’s lending levels to borrowers 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 (\$73,078 for the Little Rock assessment area as of 2024). 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, 2024 aggregate data for the assessment area is displayed.

<b>Borrower Distribution of HMDA Loans</b>									
<b>Assessment Area: Little Rock</b>									
<b>Product Type</b>	<b>Borrower Income Levels</b>	<b>2024</b>							
		<b>Count</b>			<b>Dollars</b>				
		<b>Bank</b>		<b>HMDA Aggregate</b>	<b>Bank</b>		<b>HMDA Aggregate</b>		<b>Families</b>
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>	
<b>Home Purchase</b>	Low	0	0.0	5.1	0	0.0	2.4	22.8	
	Moderate	1	10.0	14.4	250	6.7	9.8	16.1	
	Middle	2	20.0	15.7	518	13.8	13.9	19.3	
	Upper	6	60.0	27.6	2,706	72.2	37.7	41.8	
	Unknown	1	10.0	37.3	273	7.3	36.1	0.0	
	<b>TOTAL</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>3,747</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Refinance</b>	Low	0	0.0	6.1	0	0.0	2.8	22.8	
	Moderate	0	0.0	14.0	0	0.0	8.7	16.1	
	Middle	0	0.0	15.3	0	0.0	11.4	19.3	
	Upper	0	0.0	29.9	0	0.0	36.2	41.8	
	Unknown	9	100.0	34.9	899	100.0	40.9	0.0	
	<b>TOTAL</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>899</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	
<b>Home Improvement</b>	Low	0	0.0	6.6	0	0.0	3.3	22.8	
	Moderate	0	0.0	15.1	0	0.0	9.7	16.1	
	Middle	0	0.0	21.9	0	0.0	14.5	19.3	
	Upper	0	0.0	45.8	0	0.0	55.3	41.8	
	Unknown	0	0.0	10.5	0	0.0	17.2	0.0	
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	

<b>Multifamily</b>	Low	0	0.0	1.1	0	0.0	0.2	N/A
	Moderate	0	0.0	0.0	0	0.0	0.0	N/A
	Middle	0	0.0	1.1	0	0.0	0.0	N/A
	Upper	0	0.0	2.1	0	0.0	0.6	N/A
	Unknown	0	0.0	95.7	0	0.0	99.2	N/A
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>N/A</b>
<b>HMDA TOTALS</b>	Low	0	0.0	5.3	0	0.0	2.3	22.8
	Moderate	1	5.3	14.2	250	5.4	8.6	16.1
	Middle	2	10.5	15.9	518	11.1	12.1	19.3
	Upper	6	31.6	29.1	2,706	58.2	34.2	41.8
	Unknown	10	52.6	35.5	1,172	25.2	42.7	0.0
	<b>TOTAL</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>4,646</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

As displayed in the preceding table, the bank did not extend any loans to low-income borrowers, which is below both the low-income family population figure (22.8 percent) and the 2024 aggregate lending level to low-income borrowers (5.3 percent), reflecting poor performance. Furthermore, the bank’s level of lending to moderate-income borrowers (5.3 percent) is significantly below both the moderate-income family population percentage (16.1 percent) and the 2024 aggregate lending level to moderate-income borrowers (14.2 percent), reflecting poor performance. Considering performance in 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 14 low-income and 30 moderate-income census tracts, representing 31.0 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 loan 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 28.9 percent of all assessment area census tracts, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank’s overall geographic distribution of loans is reasonable. The following table displays the geographic distribution of 2024 small business loan activity by geography income level compared to the location of businesses throughout the bank’s assessment area and 2024 small business aggregate lending.

Geographic Distribution of Small Business Loans Assessment Area: Little Rock							
Tract Income Levels	2024						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	1	1.8	6.1	38	0.3	8.4	7.5
Moderate	9	15.8	17.5	2,629	19.9	21.4	20.7
Middle	30	52.6	35.1	5,773	43.8	29.1	34.7
Upper	17	29.8	40.5	4,747	36.0	40.9	36.8
Unknown	0	0.0	0.7	0	0.0	0.2	0.3
<b>TOTAL</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>13,187</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

While the bank’s level of lending in low-income census tracts (1.8 percent) trails comparison data, opportunities for small business lending in these geographies are likely limited given the low percentage of businesses in the assessment area that are located in these geographies (7.5 percent) and the low aggregate lending level (6.1 percent). Given these factors, the bank’s performance in low-income geographies was considered reasonable. Lending in moderate-income geographies totaled 15.8 percent, which was in line with the 2024 aggregate moderate-income lending level of 17.5 percent but below the demographic figure of 20.7 percent. As aggregate lending levels are considered a more accurate indicator of performance, overall geographic distribution of small business loans is considered reasonable.

Next, the following table displays the geographic distribution of 2024 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of HMDA Loans Assessment Area: Little Rock								
Product Type	Tract Income Levels	2024						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	4.1	0	0.0	2.2	4.2
	Moderate	0	0.0	14.4	0	0.0	10.1	15.7
	Middle	9	90.0	45.5	3,146	84.0	42.9	43.8
	Upper	1	10.0	36.0	601	16.0	44.8	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>3,747</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Refinance</b>	Low	1	11.1	3.7	100	11.1	1.9	4.2
	Moderate	6	66.7	14.4	608	67.6	10.2	15.7
	Middle	2	22.2	48.1	191	21.2	46.0	43.8
	Upper	0	0.0	33.8	0	0.0	41.9	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>899</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement</b>	Low	0	0.0	6.2	0	0.0	3.9	4.2
	Moderate	0	0.0	14.2	0	0.0	11.9	15.7
	Middle	0	0.0	38.7	0	0.0	35.1	43.8
	Upper	0	0.0	40.9	0	0.0	49.1	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily</b>	Low	0	0.0	30.9	0	0.0	10.4	10.6
	Moderate	0	0.0	22.3	0	0.0	17.5	25.3
	Middle	0	0.0	23.4	0	0.0	34.2	35.8
	Upper	0	0.0	23.4	0	0.0	37.9	28.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>HMDA TOTALS</b>	Low	1	5.3	4.4	100	2.2	3.0	4.2
	Moderate	6	31.6	14.6	608	13.1	10.9	15.7
	Middle	11	57.9	45.3	3,337	71.8	42.4	43.8
	Upper	1	5.3	35.8	601	12.9	43.7	36.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>4,646</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

While the bank made only one loan in a low-income geography, this performance is reasonable given the limited lending opportunities in low-income census tracts. As evidenced by HMDA aggregate lending data, other lenders made only 4.4 percent of home mortgage loans in low-income census tracts, and only 4.2 percent of assessment area owner-occupied housing units are in low-income census tracts. The bank's total penetration of moderate-income census tracts by number of loans (31.6 percent) more than doubles the percentage of owner-occupied housing units in moderate-income census tracts (15.7 percent) and 2024 HMDA aggregate lending levels of 14.5 percent, resulting in excellent HMDA lending performance in moderate-income geographies. Considering performance across both geographies, the bank's geographic distribution of HMDA loans is reasonable.

## COMMUNITY DEVELOPMENT TEST

The bank demonstrates adequate responsiveness to community development needs within the Little Rock 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, donations, and community development services.

During the review period, the bank extended four community development loans totaling \$13.6 million in this assessment area. Two of these loans had a purpose of economic development, supporting small business and job creation for LMI workers. The other two loans assisted with affordable housing options with multifamily housing reserved for LMI renters.

The bank maintained four ongoing investments in the assessment area totaling \$3.0 million that are all municipal bonds to schools serving a majority of LMI students. Additionally, the bank made 21 donations totaling \$101,301 in this assessment area. Finally, bank personnel provided 14 community development services to eight different organizations in this assessment area.

## HOT SPRINGS, ARKANSAS MSA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HOT SPRINGS ASSESSMENT AREA

The Hot Springs MSA is composed of a single county, Garland County, which also coincides with this assessment area delineation. The bank operates four offices in this assessment area and did not open or close any branches during the review period. 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	5,381	4,672	6,076	9,942	<b>26,071</b>
	20.6%	17.9%	23.3%	38.1%	<b>100.0%</b>
Household Population	9,953	6,353	7,422	17,178	<b>40,906</b>
	24.3%	15.5%	18.1%	42.0%	<b>100.0%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	9	15	5	1	<b>30</b>
	0.0%	30.0%	50.0%	16.7%	3.3%	<b>100.0%</b>
Family Population	0	7,034	13,910	4,829	298	<b>26,071</b>
	0.0%	27.0%	53.4%	18.5%	1.1%	<b>100.0%</b>
Household Population	0	11,718	21,276	7,059	853	<b>40,906</b>
	0.0%	28.6%	52.0%	17.3%	2.1%	<b>100.0%</b>
Business Institutions	0	1,298	1,939	712	62	<b>4,011</b>
	0.0%	32.4%	48.3%	17.8%	1.5%	<b>100.0%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOT SPRINGS 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 Pine Bluff and Little Rock assessment areas, which were reviewed using full-scope procedures, 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 A*.

<b>Lending Test Criteria</b>	<b>Performance</b>
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

**COMMUNITY DEVELOPMENT TEST**

The bank’s Community Development Test performance in this assessment area is below the bank’s Community Development Test performance in the assessment areas that were reviewed using full-scope procedures.

During the review period, the bank did not make any community development loans in the assessment area. Two prior-period investments in the assessment area were maintained, totaling \$535,495. The bank made 18 donations totaling \$17,500 and provided 18 services to six community development organizations in this assessment area.

## ARKANSAS NONMETROPOLITAN STATEWIDE AREA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DALLAS COUNTY ASSESSMENT AREA

This assessment area includes the entirety of Dallas County, and the bank operates one office in this assessment area. The bank did not open or close any branches 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	375	388	352	748	<b>1,863</b>
	20.1%	20.8%	18.9%	40.2%	<b>100.0%</b>
Household Population	883	567	440	1,102	<b>2,992</b>
	29.5%	19.0%	14.7%	36.8%	<b>100.0%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	1	1	1	0	<b>3</b>
	0.0%	33.3%	33.3%	33.3%	0.0%	<b>100.0%</b>
Family Population	0	443	862	558	0	<b>1,863</b>
	0.0%	23.8%	46.3%	30.0%	0.0%	<b>100.0%</b>
Household Population	0	667	1,484	841	0	<b>2,992</b>
	0.0%	22.3%	49.6%	28.1%	0.0%	<b>100.0%</b>
Business Institutions	0	23	183	36	0	<b>242</b>
	0.0%	9.5%	75.6%	14.9%	0.0%	<b>100.0%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS COUNTY ASSESSMENT AREA**

**LENDING TEST**

Considering assessment area demographics and a low level of lending activity available for analysis, the bank’s Lending Test performance in this assessment area is consistent with performance in the full-scope review assessment areas. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix A*.

<b>Lending Test Criteria</b>	<b>Performance</b>
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

**COMMUNITY DEVELOPMENT TEST**

The bank’s Community Development Test performance in this assessment area is below the bank’s Community Development Test performance in the assessment areas that were reviewed using full-scope procedures. During the review period, the bank did not make any community development loans, and there were no community development investments applicable to this assessment area. However, the bank made five community development donations totaling \$5,500 and provided six community development services to three different organizations in this assessment area.

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

**Hot Springs Assessment Area**

Small Business Loans by Revenue and Loan Size Assessment Area: Hot Springs								
Business Revenue and Loan Size		2024						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	5	83.3	50.3	331	91.7	48.1	92.7
	Over \$1 Million/ Unknown	1	16.7	49.7	30	8.3	51.9	7.3
	<b>TOTAL</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>361</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less	5	83.3	91.4	239	66.2	34.3	
	\$100,001–\$250,000	1	16.7	5.2	122	33.8	20.9	
	\$250,001–\$1 Million	0	0.0	3.5	0	0.0	44.8	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	<b>TOTAL</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>361</b>	<b>100.0</b>	<b>100.0</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	80.0		209	63.1		
	\$100,001–\$250,000	1	20.0		122	36.9		
	\$250,001–\$1 Million	0	0.0		0	0.0		
	Over \$1 Million	0	0.0		0	0.0		
	<b>TOTAL</b>	<b>5</b>	<b>100.0</b>		<b>331</b>	<b>100.0</b>		

Borrower Distribution of HMDA Loans Assessment Area: Hot Springs								
Product Type	Borrower Income Levels	2024						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	4.8	0	0.0	2.1	20.6
	Moderate	0	0.0	12.3	0	0.0	7.2	17.9
	Middle	2	12.5	15.4	323	6.4	11.9	23.3
	Upper	11	68.8	40.8	3,864	77.0	52.9	38.1
	Unknown	3	18.8	26.6	830	16.5	25.9	0.0
	<b>TOTAL</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>5,017</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Refinance	Low	0	0.0	8.0	0	0.0	3.4	20.6
	Moderate	0	0.0	12.3	0	0.0	6.7	17.9
	Middle	0	0.0	14.7	0	0.0	9.4	23.3
	Upper	1	100.0	36.9	47	100.0	46.5	38.1
	Unknown	0	0.0	28.0	0	0.0	33.9	0.0
	<b>TOTAL</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	8.5	0	0.0	5.5	20.6
	Moderate	0	0.0	19.4	0	0.0	11.7	17.9
	Middle	0	0.0	17.5	0	0.0	16.9	23.3
	Upper	0	0.0	48.8	0	0.0	54.3	38.1
	Unknown	0	0.0	5.7	0	0.0	11.6	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
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	17.4	0	0.0	4.9	N/A
	Unknown	0	0.0	82.6	0	0.0	95.1	N/A
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>N/A</b>
HMDA TOTALS	Low	0	0.0	5.9	0	0.0	2.4	20.6
	Moderate	0	0.0	12.8	0	0.0	6.9	17.9
	Middle	2	11.8	15.3	323	6.4	10.9	23.3
	Upper	12	70.6	40.3	3,911	77.2	49.3	38.1
	Unknown	3	17.6	25.8	830	16.4	30.4	0.0
	<b>TOTAL</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>5,064</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Geographic Distribution of Small Business Loans Assessment Area: Hot Springs							
Tract Income Levels	2024						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	16.7	28.4	29	8.0	33.2	32.4
Middle	2	33.3	51.8	80	22.2	46.0	48.3
Upper	3	50.0	17.5	252	69.8	18.7	17.8
Unknown	0	0.0	2.3	0	0.0	2.2	1.5
<b>TOTAL</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>361</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Geographic Distribution of HMDA Loans Assessment Area: Hot Springs								
Product Type	Tract Income Levels	2024						
		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	1	6.3	23.4	199	4.0	19.3	24.0
	Middle	10	62.5	49.3	3,791	75.6	53.1	54.3
	Upper	5	31.3	26.6	1,027	20.5	27.4	21.0
	Unknown	0	0.0	0.7	0	0.0	0.3	0.7
	<b>TOTAL</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>5,017</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	22.6	0	0.0	21.8	24.0
	Middle	0	0.0	53.2	0	0.0	54.2	54.3
	Upper	1	100.0	23.9	47	100.0	23.7	21.0
	Unknown	0	0.0	0.3	0	0.0	0.3	0.7
	<b>TOTAL</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>47</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	23.7	0	0.0	20.9	24.0
	Middle	0	0.0	51.2	0	0.0	54.2	54.3
	Upper	0	0.0	23.7	0	0.0	24.5	21.0
	Unknown	0	0.0	1.4	0	0.0	0.4	0.7
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	43.5	0	0.0	27.7	38.1
	Middle	0	0.0	52.2	0	0.0	66.0	48.2
	Upper	0	0.0	4.3	0	0.0	6.3	7.9
	Unknown	0	0.0	0.0	0	0.0	0.0	5.9
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	5.9	23.4	199	3.9	20.4	24.0
	Middle	10	58.8	50.5	3,791	74.9	53.9	54.3
	Upper	6	35.3	25.4	1,074	21.2	25.4	21.0
	Unknown	0	0.0	0.6	0	0.0	0.3	0.7
	<b>TOTAL</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>5,064</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

**Dallas County Assessment Area**

Small Business Loans by Revenue and Loan Size Assessment Area: Dallas County								
Business Revenue and Loan Size		2024						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	2	66.7	47.2	67	57.3	38.8	84.7
	Over \$1 Million/ Unknown	1	33.3	52.8	50	42.7	61.2	15.3
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Loan Size	\$100,000 or Less	3	100.0	94.4	117	100.0	59.5	
	\$100,001–\$250,000	0	0.0	4.2	0	0.0	27.5	
	\$250,001–\$1 Million	0	0.0	1.4	0	0.0	13.0	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	2	100.0		67	100.0		
	\$100,001–\$250,000	0	0.0		0	0.0		
	\$250,001–\$1 Million	0	0.0		0	0.0		
	Over \$1 Million	0	0.0		0	0.0		
	<b>TOTAL</b>	<b>2</b>	<b>100.0</b>		<b>67</b>	<b>100.0</b>		

Borrower Distribution of HMDA Loans Assessment Area: Dallas County								
Product Type	Borrower Income Levels	2024						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	4.2	0	0.0	2.0	20.1
	Moderate	0	0.0	18.8	0	0.0	12.6	20.8
	Middle	0	0.0	10.4	0	0.0	12.8	18.9
	Upper	0	0.0	37.5	0	0.0	43.7	40.2
	Unknown	0	0.0	29.2	0	0.0	28.9	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	10.3	0	0.0	6.0	20.1
	Moderate	0	0.0	13.8	0	0.0	7.4	20.8
	Middle	0	0.0	20.7	0	0.0	18.5	18.9
	Upper	0	0.0	34.5	0	0.0	38.3	40.2
	Unknown	0	0.0	20.7	0	0.0	29.8	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

<b>Home Improvement</b>	Low	0	0.0	25.0	0	0.0	39.6	20.1
	Moderate	0	0.0	25.0	0	0.0	13.9	20.8
	Middle	0	0.0	25.0	0	0.0	28.5	18.9
	Upper	0	0.0	25.0	0	0.0	18.1	40.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily</b>	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	0.0	0	0.0	0.0	N/A
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>N/A</b>
<b>HMDA TOTALS</b>	Low	0	0.0	7.4	0	0.0	4.0	20.1
	Moderate	0	0.0	17.3	0	0.0	10.8	20.8
	Middle	0	0.0	14.8	0	0.0	15.0	18.9
	Upper	0	0.0	35.8	0	0.0	41.4	40.2
	Unknown	0	0.0	24.7	0	0.0	28.8	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

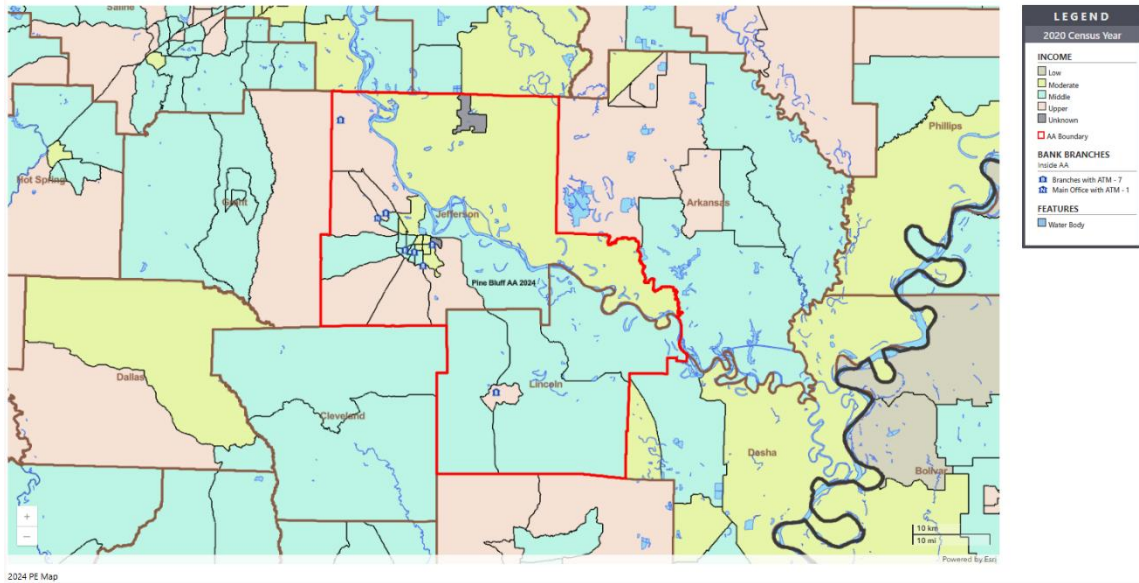
<b>Geographic Distribution of Small Business Loans</b>							
<b>Assessment Area: Dallas County</b>							
<b>Tract Income Levels</b>	<b>2024</b>						
	<b>Count</b>			<b>Dollars</b>			<b>Businesses</b>
	<b>Bank</b>		<b>Aggregate</b>	<b>Bank</b>		<b>Aggregate</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	16.7	0	0.0	18.2	9.5
Middle	1	33.3	54.2	50	42.7	64.4	75.6
Upper	2	66.7	29.2	67	57.3	17.4	14.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>TOTAL</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Geographic Distribution of HMDA Loans Assessment Area: Dallas County								
Product Type	Tract Income Levels	2024						
		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	16.7	0	0.0	14.1	28.4
	Middle	0	0.0	62.5	0	0.0	65.2	39.5
	Upper	0	0.0	20.8	0	0.0	20.7	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	13.8	0	0.0	22.7	28.4
	Middle	0	0.0	72.4	0	0.0	54.7	39.5
	Upper	0	0.0	13.8	0	0.0	22.6	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
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	28.4
	Middle	0	0.0	100.0	0	0.0	100.0	39.5
	Upper	0	0.0	0.0	0	0.0	0.0	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
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	8.8
	Middle	0	0.0	0.0	0	0.0	0.0	91.2
	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
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	14.8	0	0.0	16.9	28.4
	Middle	0	0.0	67.9	0	0.0	62.0	39.5
	Upper	0	0.0	17.3	0	0.0	21.1	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	<b>TOTAL</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

**APPENDIX B – ASSESSMENT AREAS DETAIL**

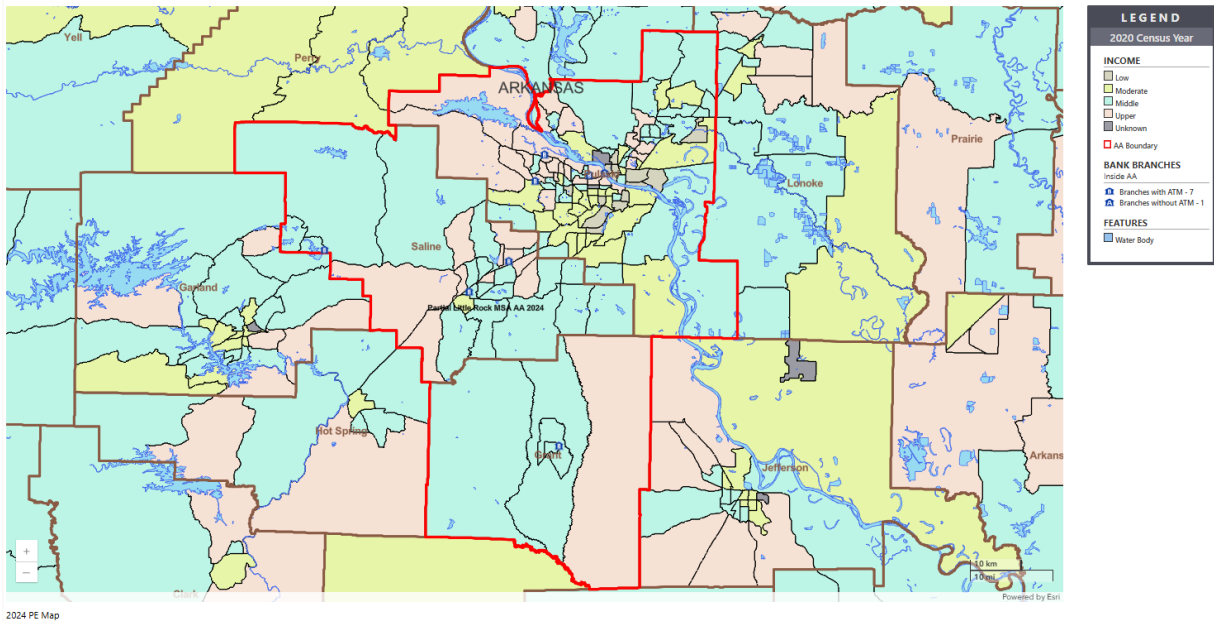
**Pine Bluff Assessment Area**

**Relyance Bk - White Hall, AR 2026**  
Pine Bluff AA



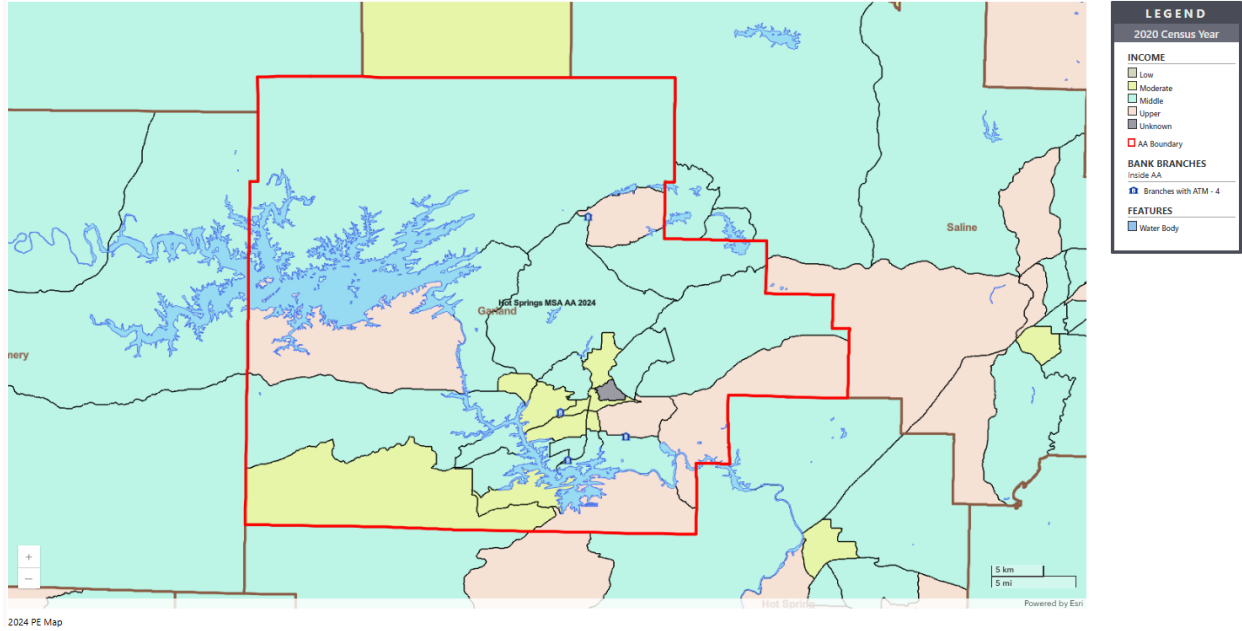
**Little Rock Assessment Area**

**Relyance Bk - White Hall, AR 2026**  
Partial Little Rock MSA AA



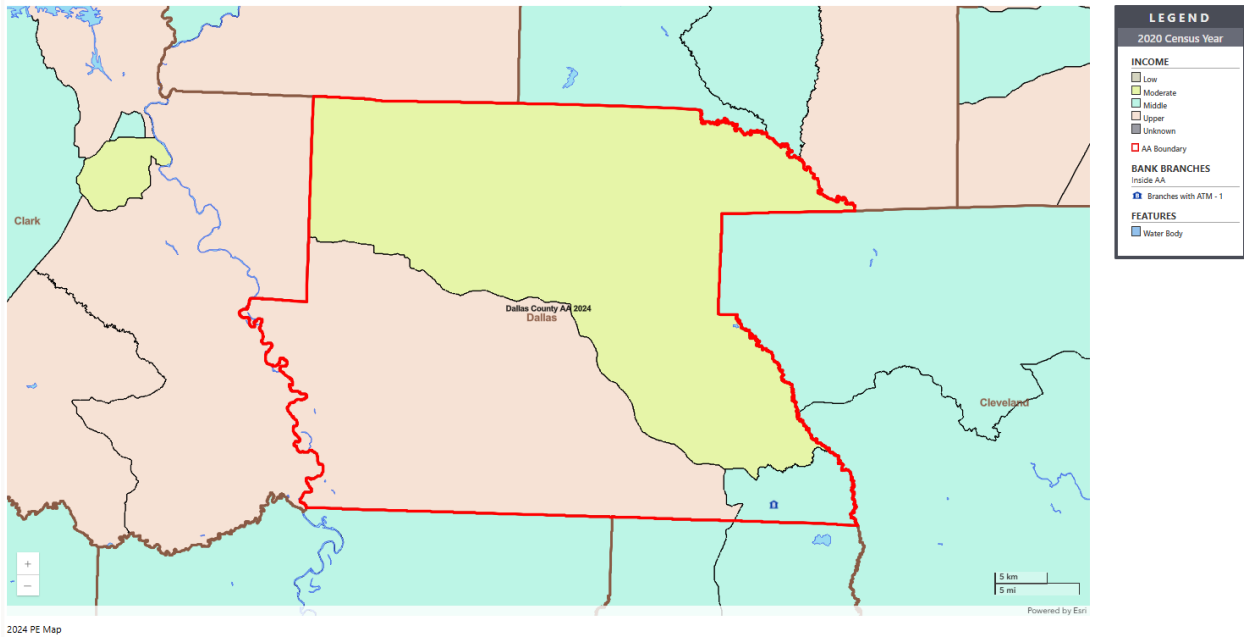
**Hot Springs Assessment Area**

Relyance Bk - White Hall, AR 2026  
Hot Springs MSA AA



**Dallas County Assessment Area**

Relyance Bk - White Hall, AR 2026  
Dallas County AA



## APPENDIX C – 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.