



PUBLIC DISCLOSURE

January 12, 2026

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Louisiana
Charter Number: 12523

128 North Parkerson Avenue
Crowley, LA 70526-5002

Office of the Comptroller of the Currency

3850 North Causeway Blvd.
Suite 1330
Metairie, LA 70002-8105

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

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Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on a more than reasonable loan-to-deposit (LTD) ratio, a majority of loans being made in the assessment areas (AAs), an excellent geographic distribution of loans, a reasonable loan distribution to borrowers of different income levels and businesses of different sizes, and a limited number of complaints.
- The Community Development (CD) Test rating is based on excellent responsiveness to CD lending and services and adequate responsiveness to CD investments.

LTD Ratio

Considering First National Bank of Louisiana's (FNB) size, financial condition, and credit needs of the AA, the LTD ratio is more than reasonable. The evaluation period for FNB resulted in an average LTD ratio of 75.2 percent. Over the evaluation period, FNB's LTD ratio fluctuated, with a quarterly low of 70.4 percent to a quarterly high of 78.1 percent. By comparison, LNB's average LTD exceeded the 61.9 percent average LTD for similarly situated financial institutions located within or near the AA.

Institution	Assets – As of December 31, 2024 (in thousands)	Average LTD
First National Bank of Louisiana	553,481	75.2%
Bank of Commerce and Trust Company	365,649	27.4%
Lakeside Bank	252,484	89.4%
Farmers State Bank and Trust Company	169,399	53.4%
First Federal Bank of Louisiana	967,447	64.4%
Rayne State Bank and Trust	525,008	74.8%

Lending in AA

A majority of FNB's loans were inside its AAs. FNB originated and purchased 84.9 percent by number and 76.5 percent by dollar amount of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. These percentages do not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the AA										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	173	84.39	32	15.61	205	35,709	78.96	9,518	21.04	45,227
Small Business	51	86.44	8	13.56	59	46,424	74.69	15,730	25.31	62,154
Total	224	84.85	40	15.15	264	82,133	76.49	25,248	23.51	107,381

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

Description of Institution

FNB is a full-service nationally chartered community bank headquartered in Crowley, Louisiana. FNB operates with five branches in three AAs, including its main branch located in Acadia Parish and another located in Lafayette Parish, which are both part of the Lafayette Metropolitan Statistical Area (MSA). There are two additional branches located in Calcasieu Parish, which is part of the Lake Charles MSA. FNB opened a new branch in May 2025 in East Baton Rouge Parish, which is part of the Baton Rouge MSA. The City of Crowley is 24 miles west of Lafayette and 47 miles east of Lake Charles, which are the two largest cities in the area. Crowley is primarily a rural and agricultural community, with a large rice industry. As of December 31, 2024, FNB's assets totaled \$553.5 million, with loans and leases of approximately \$383 million. Deposits totaled \$495.2 million, and tier 1 capital totaled 60.3 million.

Banking hours reasonably meet community needs. Lobby hours in the Lafayette MSA AA are 8:30 a.m. through 4:00 p.m. Lobby hours in the Lake Charles MSA AA vary slightly and are 9:00 a.m. through 4:00 p.m. FNB offers extended hours on Fridays and via the drive-thru window, which are available at both the Lafayette and Lake Charles MSA AA locations. FNB has partnered with Rayne State Bank to offer free access to that institution's ATM for balance inquiries and cash withdrawals. In April 2023, FNB consolidated two branch locations in the Lafayette MSA AA. FNB offers standard deposit products, online and mobile banking, online bill pay, Zelle, mobile deposit, treasury management, and merchant card services. There are no significant differences between products offered at FNB's various branches.

FNB's primary business focus is commercial lending, with commercial real estate (CRE) representing the largest segment of the loan portfolio. However, FNB offers a wide variety of loan products to serve the diverse needs of its communities, including Small Business Administration (SBA), one- to four-family, agricultural, and consumer loans. There has been no change in focus regarding products since the previous CRA performance evaluation. As of December 31, 2024, FNB separated from its holding company and was added to a new holding company called First National Bancshares of Louisiana, Inc., which was the result of a holding company split from a former related entity, and spin-off of FNB under a new holding company.

As illustrated in the table below, FNB's primary loan products include small business and home mortgage lending. While commercial and industrial loans make up a significant portion of the loan portfolio, these products are primarily unsecured or otherwise unrelated to CRA. As of December 31, 2024, FNB's loan portfolio consisted of the following:

FNB Loan Portfolio		
Loan Category	Dollars (000)	Percentage
Non-Farm and Non-Residential	157,425	41.1
Home Mortgage	73,464	19.2
Construction and Land Development	31,878	8.3
Farmland	12,553	3.3
Multifamily	9,333	2.4
Commercial and Industrial	93,021	24.3
Other	4,967	1.3
Total	382,641	100.0

Source: Call Report; *May not total 100% due to rounding.

FNB has no affiliate or operating subsidiary activities to consider when evaluating CRA performance. There were no legal or financial factors impeding the institution's ability to meet credit needs in its AA during the evaluation period. FNB's CRA performance was rated "Outstanding" in the last CRA performance evaluation as of October 31, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the CRA performance of FNB using the Interagency Intermediate-Small Bank CRA procedures, which focused on FNB's primary loan products and CD activities. The evaluation period covered January 1, 2022, through December 31, 2024. Conclusions regarding FNB's lending performance are based on a review of residential real estate loans and small business loans. This review included all loans reported on the HMDA loan application register and a sample of 59 small business loans for 2022, 2023, and 2024. CD activities include qualifying loans, investments, and services covering the same review period. Due to changes in AA demographics during the review period, we combined and analyzed 2022 and 2023 data separately from 2024 data.

Selection of Areas for Full-Scope Review

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

During the review period being analyzed, FNB operated in two assessment areas in the State of Louisiana, including the Lafayette MSA AA and the Lake Charles MSA AA. We conducted a full-scope review on the Lafayette MSA AA, as that area includes FNB's main office, 77.9 percent of total deposits, and 57.8 percent of total HMDA loans. We conducted a limited-scope review of the Lake Charles MSA AA.

Ratings

FNB's overall rating is based on activity in the state of Louisiana, with emphasis on the full-scope review of the Lafayette MSA AA. Both residential and commercial lending received equal consideration. We placed more weight on the combined 2022-2023 review period, as there was significantly more lending activity during that combined period than in 2024.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Louisiana

CRA rating for the State of Louisiana: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- An excellent geographic distribution of loans in the state.
- A reasonable distribution of loans to individuals of different income levels given the demographics in the AA.
- An excellent level of CD lending and services and an adequate level of CD investments.
- A limited number of complaints.

Description of Institution's Operations in Louisiana

During the review period, FNB served its community through four branches located in two AAs, including the Lafayette MSA AA and the Lake Charles MSA AA. FNB opened a new branch in the Baton Rouge MSA AA in 2025, which was after this review period.

For this performance evaluation, the Lafayette MSA AA received a full-scope review and the Lake Charles MSA AA received a limited-scope review. FNB primarily offers residential real estate and commercial loans.

Lafayette MSA AA

FNB operates with two branches in Acadia Parish and two branches in Lafayette Parish, both of which are part of the Lafayette MSA. The Lafayette MSA consists of five parishes. Given the number of branches in the MSA, management determined the entire MSA would be too large to serve, and has focused activities on the two parishes where branches are located. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding low- and moderate-income areas. Acadia Parish consists of three municipalities including Eunice, Rayne, the parish seat in the city of Crowley, and multiple additional towns and villages. FNB's main branch is located in Crowley. The city of Lafayette is the seat of Lafayette Parish and is the largest city in the region. Lafayette Parish includes five cities, one town, and numerous unincorporated communities.

The Lafayette MSA AA consists of 79 census tracts (CTs) including six low-income CTs (7.6 percent), 18 moderate-income CTs (22.8 percent), 22 middle-income CTs (27.9 percent), and 33 upper-income CTs (41.8 percent).

FNB faces considerable competition in the AA, which includes state and federal community banks, credit unions, and mortgage banking companies with regional and national footprints. Based on the most

recent Deposit Market Share Report, FNB ranked 7th out of 33 institutions in this AA, holding a 4.0 percent market share. FNB's five largest competitors command 70.2 percent of the deposit market.

HMDA aggregate data for 2024 shows that FNB ranked 91st out of 329 financial institutions lending in the AA. Financial institutions originated a total of 10,031 loans in the AA, of which FNB achieved a market share of 0.2 percent. The top five lenders in the AA achieved a combined market share of 26.8 percent, reflecting significant competition for mortgage loans in the AA.

The Federal Financial Institutions Examination Council (FFIEC) reported an updated 2021 median family income of \$77,400 for the AA. Low-income is defined as less than 50 percent of the median family income. Moderate income is defined as 50 percent to less than 80 percent of the median family income. Middle income is defined as 80 percent to 119 percent of the median family income. Upper income is defined as 120 percent of the median family income and over. The following table details income categories:

Income Categories – Lafayette MSA AA			
Low	Moderate	Middle	Upper
<\$38,700	\$38,701 to <\$61,920	\$61,921 to <\$92,880	≥\$92,881

The HUD adjusted MSA median family income for the assessment area in 2022-2023 was \$77,400. Using FNB's current policy underwriting standards, a low-income borrower would qualify for a maximum loan amount of \$165,000, and a moderate-income borrower would qualify for a maximum loan of \$271,000. While census data reports the median home price in the AA to be \$162,900, the average listing price in the AA during the review period was significantly higher. Based on data obtained from nationally recognized real estate websites, the median listing price for a residence within this AA was \$264,667 and the average home value was \$214,838. A low supply of housing and increased demand caused housing prices to increase significantly during the review period.

Additionally, we considered the average age of the housing stock in the AA, which the 2024 U.S. Census reported as 34 years. We note that older homes often have higher maintenance costs compared to new housing stock and frequently require significant updates for compliance with code. Older houses are often less energy-efficient, resulting in higher utility costs which increase overall homeownership costs. These additional costs negatively affect the ability of low- and moderate-income individuals to save for necessary downpayments or otherwise qualify for mortgage loans in the AA.

Based on this information, low-income borrowers and some moderate-income borrowers may be unable to purchase homes, even without considering the cost of insurance and assuming borrowers have no additional debt. Home insurance premiums increased significantly during the review period, which presents a significant challenge to home ownership.

Low-income families earning a median family income less than \$38,700 represented 24.0 percent of families in the AA, while moderate-income families comprised 13.9 percent of the population. In the 2022-2023 period, 17.4 percent of households in the AA earned wages below the poverty level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the six low-income and 18 moderate-income CTs in the AA. Of the 130,371 housing units within the AA, only 6.8 percent are in the low-income CTs and only 23.9 percent are in the moderate-income CTs. These percentages are reduced further when focusing solely on owner-occupied housing units, with only 4.1 percent located in low-income CTs and 20.3 percent in moderate-income CTs.

AAs - Lafayette MSA						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	79	7.59	22.78	27.85	41.77	0.00
Population by Geography	299,329	6.08	22.69	24.39	46.85	0.00
Housing Units by Geography	130,371	6.83	23.94	24.87	44.37	0.00
Owner-Occupied Housing by Geography	77,404	4.08	20.32	23.28	52.31	0.00
Occupied Rental Units by Geography	37,670	11.14	28.93	28.07	31.87	0.00
Vacant Units by Geography	15,297	10.11	29.93	24.99	34.97	0.00
Businesses by Geography	20,190	6.70	19.18	22.08	52.05	0.00
Farms by Geography	787	5.21	19.82	27.45	47.52	0.00
Family Distribution by Income Level	75,019	24.02	13.98	16.23	45.77	0.00
Household Distribution by Income Level	115,074	25.75	14.77	13.95	45.53	0.00
Unemployment rate (%)	5.86	7.94	7.62	6.74	4.32	0.00
Households Below Poverty Level (%)	17.42	39.94	24.26	18.66	10.12	0.00
Median Family Income (29180 - Lafayette, LA MSA)		\$66,741			Median Housing Value	\$171,200
Median Family Income (29180 - Lafayette, LA MSA) for 2023		\$77,400			Median Gross Rent	\$841
					Families Below Poverty Level	13.73
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

The AA's economy is mixed and includes retail, education, medical services, manufacturing, mining, and tourism as major economic drivers. Agriculture (primarily rice, soybeans, and crawfish), comprises a major segment of the AA's economy, particularly in Acadia Parish. Major employers in the AA include the Lafayette Parish School System (education), Ochsner Lafayette General (medical services), Wood Group Production Services (oil and gas services), and Lafayette Consolidated Government (municipal government). According to the Bureau of Labor Statistics, the Lafayette MSA AA had a 4.1 percent unemployment rate in 2024, which was slightly lower than the Louisiana state average of 4.6 percent.

In conjunction with this performance evaluation, we conducted an interview with several community leaders in the AA. The primary credit needs in the community were identified as affordable housing (including downpayment assistance), financial education, and small business lending.

Scope of Evaluation in Louisiana

As previously discussed, FNB operates in two AAs in the state of Louisiana, which are the Lafayette MSA AA and the Lake Charles MSA AA. The Lafayette MSA AA received a full-scope review while the Lake Charles MSA AA received a limited-scope review. We analyzed FNB's home mortgage and small business lending, with an equal weight on both products.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

FNB exhibited excellent geographic distribution of loans in the state.

Home Mortgage Loans

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

2022-2023

FNB exhibited a reasonable geographic distribution of loans in the Lafayette MSA AA. While the percentage of loans in the low-income geographies exceeded both the comparator and aggregate lending and was therefore considered excellent, the percentage of loans in the moderate-income geographies was slightly less than both the comparator and aggregate lending and was therefore considered reasonable.

2024

There was an insufficient number of mortgage loans originated in 2024 to allow for meaningful analysis.

Small Loans to Businesses

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

2022-2023

FNB exhibited an excellent geographic distribution of small loans to businesses in the Lafayette MSA AA when considering demographic and market conditions. The percentage of loans exceeded both the percentage of businesses and the percentage of aggregate lending in both the low- and moderate-income geographies in the AA.

2024

There was an insufficient number of loans originated in 2024 to allow for meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

FNB exhibited a reasonable distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank.

Home Mortgage Loans

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

2022-2023

FNB exhibited a reasonable distribution of loans in the AA. While the percentage of loans to low-income borrowers was significantly lower than the comparator, it was commensurate with aggregate lending and is therefore considered reasonable.

FNB's lending to moderate-income borrowers was lower than both the comparator and aggregate lending but is considered reasonable when considering demographic and market conditions. With a median list price of \$264,667 in the AA and moderate-income borrowers qualifying for loan amounts between approximately \$165,000 and \$271,000, home ownership is out of reach for many moderate-income borrowers in the AA, particularly considering the cost of insurance and potential costs associated with aging homes. Additionally, FNB faced competition for mortgage loans in the AA, with a market share of only 0.2 percent.

2024

There was an insufficient number of mortgage loans originated in 2024 to allow for meaningful analysis.

Small Loans to Businesses

Refer to Table 10 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the FNB's originations and purchases of small loans to businesses.

2022-2023

The distribution of small loans to businesses in the Lafayette MSA AA was considered reasonable, with FNB's lending being low relative to number of businesses in the AA but exceeding aggregate lending.

2024

There was an insufficient number of loans originated in 2024 to allow for meaningful analysis.

Responses to Complaints

Management received a limited number of complaints during the review period. All complaints were appropriately addressed within a timely manner. The complaints received did not directly involve Community Reinvestment Act rules or regulations.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the FNB's performance under the Lending Test in the Lake Charles MSA AA was weaker than the FNB's overall performance under the Lending Test in the full scope area(s). FNB did not originate a sufficient number of small business loans in the Lake Charles MSA AA

in 2022-2023 and did not originate a sufficient number of mortgage or business loans in 2024 to allow for meaningful analysis.

CD TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, FNB exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and community development services, as appropriate.

Number and Amount of CD Loans

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

Table 3: CD Loans				
AA	Total			
	#	% of Total #	\$(000's)	% of Total
Lafayette MSA AA	56	48.3	30,606	57.7
Lake Charles MSA AA	53	45.7	13,582	25.6
Broader, Statewide, or Regional	7	6.0	8,830	16.7
Total	116	100.0	53,018	100.0

Source: Call Report; *May not total 100% due to rounding.

During the evaluation period, FNB originated 109 qualifying CD loans in the state-wide AAs, totaling approximately \$44.2 million. In the Lafayette MSA AA, qualifying CD loans totaled \$30.6 million, representing 65.4 percent of allocated tier one capital. In the Lake Charles MSA AA, qualifying CD loans totaled \$13.6 million, representing 102.9 percent of allocated tier one capital.

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

In addition to CD lending in its AAs, FNB originated seven CD loans in the broader area that benefited low- or moderate-income areas and focused on both affordable housing and economic development. These seven loans totaled \$6.2 million and represented 10.3 percent of tier one capital. These additional CD loans originated outside the FNB's AAs had a positive impact on FNB's overall CD rating.

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

- A loan for approximately \$2 million for the purchase of 22 mobile home park loans and 66 self-storage rental units, with the mobile homes providing affordable housing.
- A loan for \$385,000 to purchase mobile MRI units and modular buildings with X-ray packages used at rural hospital locations located in moderate-income CTs.
- A loan for \$750,000 for the renovation and maintenance of a high school located in a moderate-income CT.

Number and Amount of Qualified Investments

AA	Prior Period		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lafayette MSA AA	4	1,675	58	234	62	72.9	1,909	44.1	0	0
Lake Charles MSA AA	2	647	18	27	20	23.5	674	15.6	0	0
Broader, Statewide, or Regional	3	1,745	0	0	3	3.5	1,745	40.3	0	0
Total	9	4,067	76	261	85	100	4,328	100	0	0

During the evaluation period, FNB made a total of six investments totaling \$2.3 million, and 76 grants/donations totaling \$260,953 in the state-wide AAs. In the Lafayette MSA AA, FNB made 62 investment and donations, including four prior period investments, totaling approximately \$1.9 million, representing 4.1 percent of allocated tier one capital. In the Lake Charles MSA AA, qualifying investments and donations totaled 20 by number and \$673,886 by dollar amount and included two prior period investments, representing 5.1 percent of allocated tier one capital.

Based on a full-scope review, FNB's qualified CD investments in the Lafayette MSA AA exhibited adequate responsiveness to CD investments needs when considering FNB's performance context, capacity, and the stated needs of the AAs. FNB's CD investment rating had a positive impact on FNB's overall rating.

In addition to FNB's CD investments in its AAs, management made three CD investments in the broader area that benefited LMI. These three prior period investments totaled \$1.7 million and represented 2.9 percent of tier one capital. These additional CD investments made outside FNB's AAs had a positive impact on FNB's overall CD rating.

The following are examples of qualified investments and donations in the AA:

- Two mortgage-backed securities totaling \$1 million. Both mortgage-backed securities focus on affordable housing in low- or moderate-income geographies in the AA.

- A \$240,000 bond to fund upgrades to Crowley’s main sewer plant system, which is located in a low- or moderate-income geography and provides low- or moderate-income jobs.

Extent to Which the Bank Provides CD Services

FNB provided an excellent level of CD services that was responsive to the needs of the community in the Lafayette MSA AA. CD services focused primarily on community service and economic development in the AA and were targeted to low- and moderate-income individuals. Bank employees participated in a variety of organizations and partnerships (including in leadership roles) that benefited low- and moderate-income individuals and promoted economic development. FNB employees also provided technical assistance on financial and banking related matters to community groups and to low- or moderate-income persons or families.

During the review period, 23 employees provided approximately 1,426 community service hours to 20 different qualifying organizations in the Lafayette MSA AA, and eight employees provided approximately 464 community service hours to 14 organizations in the Lake Charles MSA AA. These activities helped to provide affordable housing and facilitate economic development, a noted need in the AA. Noteworthy examples of organizations where bank employees provided CD services include:

- An organization that serves children and teenagers throughout the country through 5,500 local clubs and reaches more than 4 million children and youths each year. Both senior management and other bank staff have worked since 2022 to open The Randy Prather Boys and Girls Crowley Unit, which is located in a low-income CT, and will provide after-school and summer programs for youths in Acadia Parish aged 6-18. FNB was one of a group of core donors that facilitated the opening of the club, and five employees donated 51 service hours to the organization during the review period.
- This organization provides after-school programming for low- or moderate-income students in the Acadiana region, including free meals and STEM programming. A bank employee was the board chair of the finance committee and provided 11 hours of community service to the organization. Four other employees provided 40 additional hours of community services to the same organization by attending outreach events meant to develop additional opportunities for the organization’s participants.
- This organization provides housing, education, and job skills to participants who are overcoming addiction and low self-esteem. Four bank employees provided 43 volunteer hours of financial literacy education and discussed other ways to meet the financial needs for low- or moderate-income persons or families in the AA. One bank employee worked with the organization in preparing a grant application sponsored through the Federal Home Loan Bank of Dallas.
- This organization provides educational tutoring services targeted at low- or moderate-income students. Two bank employees provided 28 hours of community service by providing financial assistance, including assistance on preparing a grant sponsored through the Federal Home Loan Bank of Dallas.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, FNB's performance under the CD Test in the Lake Charles MSA AA was consistent with the overall performance under the CD Test in the full-scope area.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage and small business CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Louisiana		
Lafayette MSA AA	Full-Scope	
Lake Charles MSA AA	Limited-Scope	

Appendix B: Summary of State Rating

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

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a ‘male householder’ and no wife present) or ‘female householder’ (a family with a ‘female householder’ and no husband present).

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a parish or group of parishes within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary parishes that represent an employment center or centers, plus adjacent parishes associated with the main/secondary parish or parishes through commuting ties.

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

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

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

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

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

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

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

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

Rating Area: A rated area is a state or multistate MSA. 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 MSA, the institution will receive a rating for the multistate MSA.

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. AA Distribution of Home Mortgage Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. AA Distribution of Home Mortgage Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. AA Distribution of Loans to Small Businesses by Income Category of the Geography -** Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than parishes, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. AA Distribution of Loans to Small Businesses by Gross Annual Revenue -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. AA Distribution of Loans to Farms by Income Category of the Geography -** Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout

those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 12. AA Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. AA Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. AA Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Lafayette MSA AA	84	17,146	57.53	13,806	4.08	11.90	2.75	20.32	16.67	17.38	23.28	20.24	23.21	52.31	51.19	56.45	--	--	--
Lake Charles MSA AA	62	12,951	42.47	8,325	6.28	19.35	3.41	16.15	9.68	13.48	38.90	45.16	44.20	38.67	25.81	38.89	--	--	--
Total	146	30,097	100.00	22,131	4.98	15.07	3.00	18.61	13.70	15.91	29.68	30.82	31.11	46.72	40.41	49.85	--	--	--

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Lafayette MSA AA	84	17,146	57.53	13,806	24.02	4.76	4.98	13.98	8.33	16.95	16.23	8.33	20.34	45.77	50.00	35.38	--	28.57	22.35
Lake Charles MSA AA	62	12,951	42.47	8,325	23.58	1.61	5.00	16.67	8.06	15.20	17.84	9.68	18.91	41.91	33.87	33.33	--	46.77	27.57
Total	146	30,097	100.00	22,131	23.84	3.42	4.99	15.08	8.22	16.29	16.89	8.90	19.80	44.19	43.15	34.61	--	36.30	24.31

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lafayette MSA AA	23	21,263	58.97	22,440	6.70	17.39	6.06	19.18	39.13	16.45	22.08	13.04	22.60	52.05	30.43	54.89	--	--	--
Lake Charles MSA AA	16	15,843	41.03	8,990	8.36	6.25	8.43	17.03	12.50	17.79	40.41	25.00	37.65	33.99	56.25	35.98	0.21	0.00	0.14
Total	39	37,106	100.00	31,430	7.24	12.82	6.74	18.47	28.21	16.83	28.07	17.95	26.90	46.14	41.03	49.48	0.07	--	0.04

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

Table 10: AA Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Lafayette MSA AA	23	21,263	58.97	22,440	88.62	52.17	48.68	3.76	34.78	7.61	13.04		
Lake Charles MSA AA	16	15,843	41.03	8,990	86.86	50.00	52.73	3.25	43.75	9.89	6.25		
Total	39	37,106	100.00	31,430	88.05	51.28	49.84	3.60	38.46	8.36	10.26		

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

Table 7: AA Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Lafayette MSA	16	2,621	59.26	6,316	4.83	12.50	2.87	22.08	25.00	20.42	29.24	56.25	27.93	43.85	6.25	48.77	--	--	--		
Lake Charles MSA	11	2,991	40.74	3,442	6.28	18.18	3.69	16.15	9.09	13.04	37.54	9.09	41.87	40.03	63.64	41.37	--	--	--		
Total	27	5,612	100.00	9,758	5.43	14.81	3.16	19.65	18.52	17.82	32.64	37.04	32.84	42.29	29.63	46.16	--	--	--		

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

Table 8: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024		
AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Lafayette MSA	16	2,621	59.26	6,316	25.17	12.50	6.86	14.04	6.25	15.44	16.93	18.75	17.43	43.86	31.25	31.82	--	31.25	28.45		
Lake Charles MSA	11	2,991	40.74	3,442	23.05	--	6.45	16.52	9.09	14.12	17.81	9.09	16.73	42.62	45.45	30.48	--	36.36	32.22		
Total	27	5,612	100.00	9,758	24.30	7.41	6.71	15.05	7.41	14.97	17.29	14.81	17.19	43.36	37.04	31.35	--	33.33	29.78		

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

AA:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lafayette MSA	8	7,230	66.67	--	7.90	12.50	--	22.35	37.50	--	29.92	25.00	--	39.83	25.00	--	--	--	--
Lake Charles MSA	4	2,088	33.33	--	8.04	25.00	--	17.38	0.00	--	39.05	25.00	--	35.30	50.00	--	0.24	--	--
Total	12	9,318	100.00	--	7.95	16.67	--	20.72	25.00	--	32.91	25.00	--	38.34	33.33	--	0.08	--	--

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

AA:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lafayette MSA	8	7,230	66.67	--	88.11	75.00	--	3.47	25.00	8.42	--
Lake Charles MSA	4	2,088	33.33	--	86.39	100.00	--	3.06	0.00	10.54	--
Total	12	9,318	100.00	--	87.55	83.33	--	3.33	16.67	9.12	--

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