



PUBLIC DISCLOSURE

April 15, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of North Arkansas
Charter Number 10406

305 Public Square
Berryville, AR 72216

Office of the Comptroller of the Currency
1401 West Capitol
Little Rock, AR 72201

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

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Overall CRA Rating: This institution is rated Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The First National Bank of North Arkansas (FNBNA) has a more than reasonable loan to deposit (LTD) ratio.
- A substantial majority of FNBNA's primary loan products are within the assessment area (AA).
- FNBNA's overall borrower distribution for loans within the AA is reasonable.
- FNBNA's overall geographic distribution for loans in the AA is reasonable.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon 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 Development: 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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): 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.

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

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

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

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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.

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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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

Tier One 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.

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.

Description of Institution

FNBNA is 100 percent owned by First Carroll Bancshares, a one-bank holding company. The main branch is located in Berryville, AR. The bank has 10 other branches located in Berryville, Eureka Springs, Green Forrest, Holiday Island, Harrison, Huntsville, Marshall and Yellville. They have 10 ATMs located at each of the branch sites named above and an additional full service ATM at the Price Cutting Shopping Center at 302 Eureka Avenue in Berryville, AR. This is the bank's only stand-alone ATM. All branch locations have a drive-thru and provide on-site lending services. The bank also has a separate asset management/trust location that handles only fiduciary services on behalf of the bank located in Berryville, Arkansas.

The bank's lending is primarily focused in 1-4 family owner-occupied and non-owner occupied residential loans and small business loans.

FNBNA does not have any legal or financial impediments that would limit its ability to meet the credit needs within its AAs. As of December 31, 2018, the bank reported total assets of \$203 million including \$159 million in net loans (78 percent of total assets). Deposits totaled \$180 million, and tier one capital was \$21.5 million, or 10.86 percent of adjusted average assets. FNBNA's prior CRA Performance Evaluation (PE) was dated September 09, 2013, and the institution was rated Satisfactory.

Description of the Assessment Area(s)

Non-MSA Arkansas Counties AA: (Baxter, Boone, Carroll, Marion, Newton, and Searcy)

FNBNA's Non-MSA AA includes the entirety of Baxter, Boone, Carroll, Marion, Newton, and Searcy counties. The 2015 Census data shows the population of the AA was 155,146 persons. There are 33 CTs total, five of which overlap in Baxter and Carroll counties. Tract characteristics are distributed into two moderate-income CTs, 29 middle-income CTs, and two upper-income CTs in the AA. Local employment for the area centers in retail trade and services. Table A, in Appendix B, reflects the most recent community profile for the Non-MSA Arkansas Counties.

Banking competition within the Assessment Area

Banking competition is high within the AA. There are 25 banks total in the market. FNBNA ranks in a three-way tie for second out of the 25 banks with a market share of 10.11 percent based on total deposits. This market covers six total counties. The AA includes two nationwide banks, four multi-state regional banks and 18 other community banks.

| Bank | Market Share |
|--|----------------|
| Arvest Bank | 16.85% |
| Anstaff Bank | 10.11% |
| First National Bank of North Arkansas | 10.11% |
| Bank of the Ozarks | 10.11% |
| Bear State Bank | 7.87% |
| First Security Bank | 6.74% |
| Equity Bank | 4.49% |
| Cornerstone Bank | 4.49% |
| Seventeen Other Banks in Deposit Market | 29.23% |
| Total | 100.00% |

Source: June 30, 2018 FDIC Market Share Data

Fayetteville-Rogers-Springdale MSA- Madison County AA

FNBNA's Fayetteville-Rogers-Springdale MSA-Madison County AA includes all of Madison County. The 2015 Census data shows the population of the AA was 15,702 persons. There are four CTs total in the county. The tract characteristics consist of three moderate income tracts and one middle income tract. Local employment for the AA centers in retail trade and services. Table A, in Appendix B, reflects the most recent community profile for the Fayetteville-Rogers-Springdale MSA - Madison County AA.

Banking competition within the AA

Banking competition within the AA is moderate. Five lending institutions hold the total market share in this AA. FNBNA holds a market share of 12.50 percent. The market area consist of one multi-regional bank and three other community banks.

| Bank | Market Share |
|--|---------------------|
| Arvest Bank | 25.00% |
| Today's Bank | 25.00% |
| Anstaff Bank | 25.00% |
| Cornerstone Bank | 12.50% |
| First National Bank of North Arkansas | 12.50% |
| Total | 100.00% |

A community contact interview was conducted to help identify possible needs within the community. The contact was to the North Arkansas Economic Development District. The contact assists local governments through strategic planning for sustainable economic and community development and provides assistance in obtaining and administering state and federal funding for such development. The contact indicated that economic conditions in the area are in line with national trends and show economic growth to be strong compared to other areas in the state of Arkansas. The contact also indicated that the financial institutions are active in the community. The key needs identified by the contact were for affordable housing. The contact indicated that the local banks are more active than the larger banks as a whole. The contact was not aware of any fair lending complaints or credit discrimination occurring to LMI individuals.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNBNA was examined using the small bank examination procedures. The evaluation period for this CRA PE was September 19, 2013, through April 15, 2019. Loan products used to assess the bank's performance under the Lending Test include residential real estate and small business loans originated between January 1, 2014, and December 31, 2017.

Data Integrity

The bank's internal auditors review the adequacy of HMDA data reporting annually. The most recent review, dated December 2018, indicates HMDA data for 2016, 2017, and 2018 are accurate. A HMDA Data Integrity Exam was conducted in November of 2018, and the HMDA LAR deemed reliable.

Selection of Areas for Full-Scope Review

As of December 31, 2018, FNBNA has two AAs: a portion of the Fayetteville-Springdale-Rogers MSA, more specifically Madison County, Arkansas, and six contiguous Non-MSA counties in North-Central to Northwest Arkansas. The specific counties are Baxter, Boone, Carroll, Marion, Newton, and Searcy.

The Non-MSA Arkansas Counties AA was selected for a full-scope review. All HMDA reportable transactions from January 1, 2017, through December 31, 2018, originated within the full-scope AA are being reviewed.

The Madison County AA portion of the Fayetteville-Springdale-Rogers MSA was chosen for limited scope review. It contains only 5 percent of total share of loan originations between the two AAs. The county consists of four census tracts total and has a lower number of originations due to only one branch in that AA.

Ratings

The bank's overall rating is based primarily on the areas receiving full-scope reviews. The areas receiving full scope reviews will be the Non-MSA Arkansas Counties AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

Lending Test

Loan to Deposit Ratio

FNBNA's average LTD ratio of 92.31 percent is more than reasonable and exceeds the standard for outstanding performance. FNBNA's LTD is more than reasonable given its size, financial condition, funding sources, and credit needs within the AA. For purposes of this analysis, several banks within the AA with comparable asset sizes were reviewed to determine the bank's performance relative to its competition. Although several institutions have a larger asset size with similar deposit share, FNBNA's LTD ratio ranks second among its peers. This reflects a strong lending presence within the community.

| Financial Institution | Total Assets | Average LTD Ratio |
|--|------------------|-------------------|
| Stone Bank | \$295,442 | 103.07 |
| First National Bank of North Arkansas | \$193,177 | 92.31 |
| Cornerstone Bank | \$267,894 | 88.20 |
| Tower Community Bank | \$189,556 | 85.57 |
| Integrity First National Bank | \$485,380 | 85.40 |
| Carroll Bank and Trust | \$280,594 | 84.78 |
| Today's Bank | \$213,091 | 79.22 |
| McKenzie Banking Company | \$130,429 | 62.23 |
| The Bank of Jackson | \$187,618 | 39.11 |

Lending in Assessment Area

| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
|----------------|-----------------|--------------|-----------|-------------|------------|------------------------------------|--------------|-----------------|-------------|-------------------|
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 291 | 96.36 | 11 | 3.64 | 302 | 20,752 | 94.02 | 1,319 | 5.98 | 22,071 |
| Small Business | 60 | 85.00 | 10 | 15 | 70 | 5,474 | 85.73 | 912 | 14.27 | 6,386 |
| Total | 351 | 94.35 | 21 | 5.65 | 372 | \$ 26,226 | 92.16 | \$ 2,231 | 7.83 | \$ 28,457 |

*Source: 1/1/2017 – 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Based on the data in the above table, FNBNA's performance for lending within the AA is outstanding and exceeds the standard for satisfactory performance. A substantial majority

of loans, 94.35 percent of total loans reviewed and 92.16 percent of the dollar volume reviewed, originated by FNBNA are located inside the AA. A sample of 20 loans from each of the bank's primary loan products from 2017-2018 was used to determine the lending in the AA. A substantial majority, 96.36 percent reviewed and 94.02 percent of the dollar volume reviewed, of residential real estate loans originated inside the AA. In addition, a substantial majority, 85.00 percent of loans reviewed and 85.73 percent of the dollar volume reviewed, of small business loans originated within the AA.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Non-MSA Arkansas Counties AA

The distribution of loans to borrowers of different income levels for residential mortgage lending and businesses of different sizes exhibits a reasonable penetration that meets the standard for satisfactory performance.

Home Mortgage Loans

The percentage of residential real estate loans originated to low income borrowers is lower than the percentage of low income families. The percentage of residential real estate loans originated to moderate income borrowers is somewhat lower than moderate income families for the 2017 assessment year.

The percentage of residential real estate loans originated to low and moderate income borrowers is somewhat lower than the percentage of low and moderate income families for the 2018 assessment year.

For performance context, it is helpful to note that the AA is made up primarily of rural counties containing an elevated level of rental and vacant units. Rental and Vacant units make up a majority of available housing units at approximately 67 percent. Additionally, the AA suffers from an elevated poverty rate at 12 percent. Given these factors, overall home mortgage lending is challenging and expected to have poorer penetration among LMI borrowers.

Loans to Small Businesses

Loans to small businesses in 2017-2018 is excellent. FNBNA's loans to small businesses with revenues of \$1 million or less exceeded the percentage of small businesses in the AA for both the 2017 and 2018 assessment year.

Refer to Table P, R, T and V in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

Fayetteville-Springdale-Rogers MSA: Madison County AA

Based on a limited scope review, the bank's performance under the Lending Test in the Madison County AA is consistent with the bank's overall satisfactory performance under the lending test.

Geographic Distribution of Loans

Non-MSA Arkansas Counties AA

The geographic distribution of loans within the AAs exhibits reasonable dispersion and meets the standard for satisfactory performance. Neither of the two AAs include any low income CTs; therefore, analysis was conducted from the moderate income CTs.

Home Mortgage Loans

The percentage of total residential real estate loans originated in moderate income geographies in 2017 for the Non-MSA Arkansas counties exceeds the housing units within moderate geographies. The percentage of total real estate loans originated in moderate income geographies in 2018 for the Non-MSA Arkansas counties is somewhat lower than housing units within those geographies.

Loans to Small Businesses

The percentage of 2017 loans to small business in moderate income census tracts exceeded the percentage of businesses located in moderate income census tracts. The percentage of 2018 loans to small businesses was lower than the percentage of businesses located in moderate income census tracts.

Refer to Table O, Q, S and U in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

Fayetteville-Springdale-Rogers MSA: Madison County

Based on a limited scope review, the bank's performance under the Lending Test in the Madison County AA is stronger than the bank's overall satisfactory performance under the lending test.

Responses to Complaints

FNBA has not had any complaints relating to the CRA since the prior examination dated September 19, 2013.

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 metropolitan and nonmetropolitan areas 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 | Lending Test (01/01/2017 to 12/31/2018) | |
| Financial Institution | | Products Reviewed |
| First National Bank of North Arkansas (FNBNA) Berryville, Arkansas | | Home Mortgages (Purchase, Refinance, and Improvement) Small Business Loans |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| N/A | N/A | N/A |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| Arkansas Non-MSA FNBNA MSA – Madison County | Full Scope Limited Scope | Includes: Baxter, Boone, Carroll, Marion, Newton, and Searcy |

Appendix B: Community Profiles for Full-Scope Areas

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|---------|---------------|------------------------------|------------------|-----------------|--------------------|
| Assessment Area: Non-MSA, AR Counties: Baxter, Boone, Carroll, Marion, Newton, and Searcy - 2017 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 33 | 0.0 | 6.1 | 87.9 | 6.1 | 0.0 |
| Population by Geography | 155,416 | 0.0 | 3.3 | 88.4 | 8.3 | 0.0 |
| Housing Units by Geography | 83,600 | 0.0 | 3.6 | 88.1 | 8.4 | 0.0 |
| Owner-Occupied Units by Geography | 48,066 | 0.0 | 3.1 | 87.2 | 9.7 | 0.0 |
| Occupied Rental Units by Geography | 15,793 | 0.0 | 4.2 | 89.7 | 6.1 | 0.0 |
| Vacant Units by Geography | 19,741 | 0.0 | 4.3 | 88.9 | 6.8 | 0.0 |
| Businesses by Geography | 9,185 | 0.0 | 2.9 | 89.3 | 7.8 | 0.0 |
| Farms by Geography | 485 | 0.0 | 4.5 | 84.5 | 10.9 | 0.0 |
| Family Distribution by Income Level | 43,296 | 0.0 | 19.8 | 23.3 | 39.2 | 0.0 |
| Household Distribution by Income Level | 63,859 | 0.0 | 16.8 | 19.8 | 42.0 | 0.0 |
| Median Family Income Fayetteville- Rogers-Springdale, AR – Madison County | | \$46,114 | Median Housing Value | | | \$120,741 |
| | | | Median Gross Rent | | | \$593 |
| | | | Families Below Poverty Level | | | 10,893 (17.06%) |
| <p>Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</p> | | | | | | |

Table A – Demographic Information of the Assessment Area

Assessment Area: Fayetteville-Rogers-Springdale, AR- Madison County Non-MSA 2017

| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Geographies (Census Tracts) | 5 | 0.0 | 25.0 | 75.0 | 0.0 | 0.0 |
| Population by Geography | 15,702 | 0.0 | 3.2 | 88.4 | 8.3 | 0.0 |
| Housing Units by Geography | 7,483 | 0.0 | 76.3 | 23.6 | 0.0 | 0.0 |
| Owner-Occupied Units by Geography | 4,825 | 0.0 | 74.1 | 25.9 | 0.0 | 0.0 |
| Occupied Rental Units by Geography | 1,513 | 0.0 | 84.1 | 15.9 | 0.0 | 0.0 |
| Vacant Units by Geography | 1,145 | 0.0 | 75.7 | 24.3 | 0.0 | 0.0 |
| Businesses by Geography | 664 | 0.0 | 80.9 | 19.1 | 0.0 | 0.0 |
| Farms by Geography | 87 | 0.0 | 73.6 | 26.4 | 0.0 | 0.0 |
| Family Distribution by Income Level | 4,654 | 0.0 | 74.4 | 25.6 | 0.0 | 0.0 |
| Household Distribution by Income Level | 6,338 | 0.0 | 76.5 | 23.5 | 0.0 | 0.0 |
| Median Family Income Fayetteville- Rogers-Springdale, AR – Madison County | | \$64,400 | Median Housing Value | | | \$93,834 |
| | | | Median Gross Rent | | | \$590 |
| | | | Families Below Poverty Level | | | 1,222 (19.28%) |

Source: 2015 ACS Census and 2017 D&B Data

Due to rounding, totals may not equal 100.0

() The NA category consists of geographies that have not been assigned an income classification.*

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** – 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 compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|
| | # | \$ | % of Total | 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 |
| FNBNA Non-MSA | 176 | 12,330 | 94.6 | 3,620 | 0.0 | 0.0 | 0.0 | 5.2 | 4.0 | 3.5 | 87.9 | 92.0 | 89.2 | 6.8 | 4.0 | 7.3 | 0.0 | 0.0 | 0.0 |
| FNBNA MSA | 10 | 405 | 5.4 | 273 | 0.0 | 0.0 | 0.0 | 51.0 | 30.0 | 45.4 | 49.0 | 70.0 | 54.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 186 | 12,735 | 100.0 | 3,893 | 0.0 | 0.0 | 0.0 | 8.9 | 5.4 | 6.4 | 84.8 | 90.9 | 86.7 | 6.3 | 3.8 | 6.8 | 0.0 | 0.0 | 0.0 |

*Source: 2010 U.S. Census; 01/01/2018 - 12/31/2014 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| | # | \$ | % of Total | 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 |
| FNBNA Non-MSA | 133 | 10,024 | 94.3 | 4,393 | 0.0 | 0.0 | 0.0 | 3.1 | 5.3 | 2.3 | 87.2 | 83.5 | 86.3 | 9.7 | 11.3 | 11.4 | 0.0 | 0.0 | 0.0 |
| FNBNA MSA | 8 | 808 | 5.7 | 358 | 0.0 | 0.0 | 0.0 | 74.1 | 75.0 | 74.0 | 25.9 | 25.0 | 26.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 141 | 10,832 | 100.0 | 4,751 | 0.0 | 0.0 | 0.0 | 9.6 | 9.2 | 7.7 | 81.6 | 80.1 | 81.7 | 8.9 | 10.6 | 10.5 | 0.0 | 0.0 | 0.0 |

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| FNBNA Non-MSA | 176 | 12,330 | 94.6 | 3,620 | 17.7 | 9.1 | 6.5 | 19.3 | 12.5 | 15.9 | 23.0 | 24.4 | 20.0 | 40.0 | 48.3 | 42.2 | 0.0 | 5.7 | 15.4 |
| FNBNA MSA | 10 | 405 | 5.4 | 273 | 29.2 | 10.0 | 12.8 | 21.3 | 30.0 | 26.4 | 20.8 | 10.0 | 20.1 | 28.8 | 40.0 | 28.2 | 0.0 | 10.0 | 12.5 |
| Total | 186 | 12,735 | 100.0 | 3,893 | 18.6 | 9.1 | 7.0 | 19.5 | 13.4 | 16.7 | 22.8 | 23.7 | 20.0 | 39.1 | 47.8 | 41.2 | 0.0 | 5.9 | 15.2 |

Source: 2010 U.S. Census ; 01/01/2018 - 12/31/2018 Bank Data, 2014 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|------------------|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| FNBNA Non-MSA | 133 | 10,024 | 94.3 | 4,393 | 17.6 | 7.5 | 6.3 | 19.8 | 15.8 | 15.5 | 23.3 | 16.5 | 19.8 | 39.2 | 49.6 | 41.7 | 0.0 | 10.5 | 16.7 |
| FNBNA MSA | 8 | 808 | 5.7 | 358 | 31.2 | 12.5 | 14.5 | 21.3 | 12.5 | 23.2 | 19.4 | 25.0 | 19.3 | 28.1 | 50.0 | 28.5 | 0.0 | 0.0 | 14.5 |
| Total | 141 | 10,832 | 100.0 | 4,751 | 19.0 | 7.8 | 6.9 | 19.9 | 15.6 | 16.0 | 23.0 | 17.0 | 19.8 | 38.2 | 49.6 | 40.7 | 0.0 | 9.9 | 16.5 |

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018**

| Assessment Area: Non-MSA | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|--------------------------|---------------------------------|-------------|------------|----------------|-------------------|--------------|-----------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| | 20 | 3.09 | | 2,769 | 0.0 | 0.0 | 0 | 2.9 | 10.0 | 3.1 | 89.3 | 90.0 | 89.5 | 7.8 | 0.0 | 8.1 | 0.0 | 0.0 | 0.0 |
| Total | 20 | 3.09 | | 2,769 | 0.0 | 0.0 | 0 | 2.9 | 10.0 | 3.1 | 89.3 | 90.0 | 89.5 | 7.8 | 0.0 | 8.1 | 0.0 | 0.0 | 0.0 |

Source: 2018 D&B Data; 01/01/2018- 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

| Assessment Area: Non-MSA | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|--------------------------|---------------------------------|-------------|------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| | 20 | 1.67 | | 2,769 | 0.0 | 0.0 | 0.0 | 2.9 | 0.0 | 2.4 | 89.3 | 70.0 | 89.5 | 7.8 | 30.0 | 8.1 | 0.0 | 0.0 | 0.0 |
| Total | 20 | 1.67 | | 2,769 | 0.0 | 0.0 | 0.0 | 2.9 | 0.0 | 2.4 | 89.3 | 70.0 | 89.5 | 7.8 | 30.0 | 8.1 | 0.0 | 0.0 | 0.0 |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

| Assessment Area: MSA | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|----------------------|---------------------------------|------------|------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| | 20 | 704 | | 2,769 | 0.0 | 0.0 | 0.0 | 2.9 | 10.5 | 2.4 | 89.3 | 73.7 | 89.5 | 7.8 | 15.8 | 8.1 | 0.0 | 0.0 | 0.0 |
| Total | 20 | 704 | | 2,769 | 0.0 | 0.0 | 0.0 | 2.9 | 10.5 | 2.4 | 89.3 | 73.7 | 89.5 | 7.8 | 15.8 | 8.1 | 0.0 | 0.0 | 0.0 |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018**

| Assessment Area: Non-MSA | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|--------------------------|---------------------------------|------|------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| | 20 | 3.09 | | 2,769 | 83.4 | 90.0 | 57.5 | 4.6 | 10.0 | 12.0 | 0.0 |
| Total | 20 | 3.09 | | 2,769 | 83.4 | 90.0 | 57.5 | 4.6 | 10.0 | 12.0 | 0.0 |

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017**

| Assessment Area: Non-MSA | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|--------------------------|---------------------------------|------|------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| | 20 | 1.67 | | 2,769 | 83.4 | 100.0 | 57.5 | 4.6 | 0.0 | 12.0 | 0.0 |
| Total | 20 | 1.67 | | 2,769 | 83.4 | 100.0 | 57.5 | 4.6 | 0.0 | 12.0 | 0.0 |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018**

| Assessment Area: Non-MSA | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|--------------------------|---------------------------------|------|------------|----------------|---------------------------------|--------------|-----------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| | 20 | 3.09 | | 2,769 | 83.4 | 90.0 | 57.5 | 4.6 | 5.0 | 12.0 | 5.0 |
| Total | 20 | 3.09 | | 2,769 | 83.4 | 90.0 | 57.5 | 4.6 | 5.0 | 12.0 | 5.0 |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0