



PUBLIC DISCLOSURE

July 31, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank USA
Charter Number: 16473

13386 Highway 90
Boutte, LA 70039

Office of the Comptroller of the Currency

3850 N. Causeway Blvd., Suite 1330
Metairie, LA 70002

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 Community Reinvestment Act (CRA) Rating

First National Bank USA (FNB USA) CRA Rating: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- A reasonable loan-to-deposit (LTD) ratio.
- Having a majority of loans inside the assessment area (AA).
- Having a reasonable geographic distribution of home mortgage loans.
- Having a reasonable distribution of loans to individuals of different income levels.
- Operating with an appropriate complaint management program.

LTD Ratio

Considering FNB USA's size, financial condition, and credit needs of the AA, the LTD ratio is reasonable. The quarterly average LTD ratio for FNB USA during the evaluation period was 71.3 percent. Since the prior performance evaluation (PE), FNB USA's quarterly LTD has ranged from a low of 49.7 percent in the first quarter 2022 to a high of 87.9 percent in the first quarter of 2019. The quarterly average LTD ratio for similarly situated financial institutions located within or near the AA was 71.5 percent.

| Institution | Assets as of December 31, 2022 (000s) | Average LTD |
|-------------------------------|---|----------------|
| FNB USA | 207,028 | 71.3% |
| First American Bank and Trust | 1,475,175 | 70.3% |
| South Louisiana Bank | 703,032 | 61.2% |
| United Community Bank | 669,176 | 83.0% |

Source: Bank Data

Lending in AA

A majority of FNB USA's loans are inside its AA.

FNB USA originated and purchased 76.2 percent by number and 81.3 percent by dollar amount of its sampled loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

| Lending Inside and Outside of the AA | | | | | | | | | | |
|---|-----------------|-------------|-----------|-------------|-----------|---------------------------------|-------------|--------------|-------------|----------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage – 2020/2021 | 17 | 80.9 | 4 | 19.1 | 21 | 3,227 | 78.4 | 891 | 21.6 | 4,118 |
| Home Mortgage - 2022 | 15 | 71.4 | 6 | 28.6 | 21 | 2,532 | 85.3 | 436 | 14.7 | 2,968 |
| Total | 32 | 76.2 | 10 | 23.8 | 42 | 5,759 | 81.3 | 1,327 | 18.7 | 7,086 |

Source: Bank Data

Description of Institution

FNB USA is a single-state community bank headquartered in Boutte, Louisiana, and is wholly owned by First St. Charles Bancshares, Inc., a one bank holding company, also located in Boutte, Louisiana. As of March 31, 2023, total assets were \$207 million with net loans and leases of approximately \$102 million. Total deposits were \$184 million and tier 1 capital was 10.6 percent. FNB USA's strategic plan is to serve its community by primarily originating residential real estate loans and does so through its main branch and a second branch located in LaPlace, Louisiana.

FNB USA's headquarters are in St. Charles Parish and the LaPlace branch is in St. John the Baptist Parish, with both parishes being part of the New Orleans-Metairie LA Metropolitan Statistical Area (MSA). Both branches are less than 30 miles away from New Orleans, the largest city in the MSA. Banking hours reasonably meet community needs with lobby hours being approximately Monday through Friday from 9:00 a.m. to 4:00 p.m., with extended branch hours on Friday and in the drive-thru. The drive-thru is also open on Saturday 9:00 a.m. to 12:00 noon. Management did not close any branches during the review period. FNB USA's headquarters are in a middle-income census tract (CT) and the LaPlace branch is in a moderate-income CT. FNB USA operates with an Internet web site that offers information on FNB USA's products and services, as well as account access.

FNB USA offers a wide range of deposit and loan products with no significant difference between branches. FNB USA primarily offers real estate, agricultural, commercial, home improvement, and consumer loans. FNB USA closes loans for secondary marketing purposes, and has no designated loan underwriters to make credit decisions. Management has not made changes to its corporate structure, including any merger or acquisition activities, since the previous PE. As illustrated in the table below, FNB USA focuses primarily on residential real estate. While commercial real estate (CRE) comprises 27.4 percent of the loan portfolio by dollar amount, there were only 53 commercial loans made during the review period. When analyzed by number, CRE is only 8.4 percent of the overall portfolio and was therefore not analyzed. As of December 31, 2022, the loan portfolio consisted of the following:

| FNB USA | | |
|------------------------------|----------------|--------------|
| Loan Category | Dollars (000s) | Percentage |
| Home Mortgage | 39,492 | 38.5 |
| Commercial Real Estate | 28,067 | 27.4 |
| Construction and Development | 19,109 | 18.7 |
| Multifamily | 8,395 | 8.2 |
| Consumer | 1,037 | 1.0 |
| Commercial and Industrial | 1,784 | 1.7 |
| Farm | 524 | 0.5 |
| Other | 4,148 | 4.0 |
| Total | 102,556 | 100.0 |

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

FNB USA's two branches operate in two AAs that are both part of the New Orleans-Metairie LA MSA and total 24 CTs, including two low-, six moderate-, eight middle-, and eight upper-income CTs. The AA meets regulatory requirements and does not arbitrarily exclude low- and moderate-income CTs. FNB USA has no affiliate or operating subsidiary activities considered when evaluating CRA performance. There were no legal or financial factors impeding FNB USA's ability to meet credit needs in its AA during the evaluation period. FNB USA's CRA performance was rated "Satisfactory" in the previous PE dated April 15, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated CRA performance of FNB USA using the Interagency Small Bank CRA procedures, which focus on an analysis of FNB USA's primary loan products. The evaluation period for the lending test covered January 1, 2020, through December 31, 2022. Conclusions regarding FNB USA's lending performance are based on a review of residential real estate loans. Since FNB USA is not a Home Mortgage Disclosure Act (HMDA) reporter, we selected a sample of 42 residential real estate loans to conduct our analysis.

During a portion of the review period, management responded to lending needs in the AA by participating in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). The bank originated 416 PPP loans totaling approximately \$21 million in 2020 and 2021. While we were unable to analyze these loans during this PE, we commend management for meeting the needs of their community during the historic pandemic.

Selection of Areas for Full-Scope Review

FNB USA operates in two AAs, with both being in the New Orleans-Metairie, LA MSA. As such, the AAs were combined for analysis purposes and this combined AA received a full-scope review. There were no additional limited-scope areas to review.

While there is only one AA for analysis purposes, the census bureau updated census data in 2022 and consequently there are two review periods during this evaluation. The first review period will analyze lending activity in the AA during 2020 and 2021, and the second evaluation will cover lending activity in the AA during 2022.

Ratings

The bank's overall rating is based on activity in the State of Louisiana, and focuses on mortgage lending in the bank's combined 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 CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by FNB USA, or in any AA by an affiliate whose loans have been considered as part of the 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that FNB USA (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 PE.

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

State Rating

State of Louisiana

CRA rating for the State of Louisiana: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- Having a reasonable geographic distribution of home mortgage loans.
- Having a reasonable distribution of loans to individuals of different income levels.
- Operating with an appropriate complaint management program.

Description of Institution's Operations in Louisiana

FNB USA serves its community through two branches, located in two AAs including St. John the Baptist Parish and St. Charles Parish, both of which are a part of the New Orleans-Metairie, LA MSA. Both AAs were combined for analysis purposes and the combined AA received a full-scope review. Due to census data changes, the full-scope AA evaluation will combine lending data from 2020 and 2021 and analyze it together and independently analyze 2022 lending data. FNB USA primarily offers real estate, agricultural, commercial, and consumer loans.

Management operates with branches in both St. Charles Parish and St. John the Baptist Parish, both of which are in the New Orleans-Metairie MSA. The New Orleans-Metairie, LA MSA includes eight parishes, and management determined the entire MSA to be too large to serve. As such, management selected as their AA the parishes where their branches are located. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding low- and moderate-income areas. These parishes are locally termed the "river parishes", as they run along the Mississippi River between New Orleans and Baton Rouge. Major cities in the AA include Boutte, Luling, St. Rose, Destrehan, and LaPlace. Hahnville is the parish seat of St. Charles Parish, and Edgard is the parish seat of St. John the Baptist Parish.

The AA's economy is diverse, with a variety of businesses including, health care, construction, and manufacturing. Primary employers include the parish school system, Shell Norco Manufacturing Complex, Dow, Dupont, and local government. According to the Bureau of Labor Statistics, as of December 2022, the unemployment rate of the AA was approximately 3.5 percent, which was slightly lower than the Louisiana state average of four percent. During the review period, the unemployment rate varied significantly, ranging from an average high of 8.4 percent to 3.2 percent.

FNB USA's competition is considerable in the AA and 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 USA ranked fifth out of 10 institutions in its AA, holding 8.4 percent of market share. The top four largest competitors command 80.3 percent of the deposit market, which is evidence of significant competition in the AA.

In conjunction with this PE, we conducted an interview with a community leader in the MSA. The primary credit needs in the community were identified as small business lending and affordable housing. According to this contact, local banks have been active in helping meet the credit needs of the AA.

The following table depicts the demographic information for the AA for 2020 and 2021.

| Demographic Information of the AA | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: St Charles Parish and St John the Baptist Parish for 2020 and 2021 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 24 | 0.0 | 25.0 | 41.7 | 33.3 | 0.0 |
| Population by Geography | 96,800 | 0.0 | 18.4 | 47.1 | 34.6 | 0.0 |
| Housing Units by Geography | 37,793 | 0.0 | 19.8 | 45.7 | 34.4 | 0.0 |
| Owner-Occupied Units by Geography | 26,568 | 0.0 | 17.2 | 44.8 | 38.0 | 0.0 |
| Occupied Rental Units by Geography | 7,147 | 0.0 | 22.7 | 50.9 | 26.4 | 0.0 |
| Vacant Units by Geography | 4,078 | 0.0 | 32.1 | 42.9 | 24.9 | 0.0 |
| Businesses by Geography | 10,668 | 0.0 | 18.2 | 46.3 | 35.5 | 0.0 |
| Farms by Geography | 225 | 0.0 | 20.9 | 40.0 | 39.1 | 0.0 |
| Family Distribution by Income Level | 24,933 | 21.2 | 16.0 | 19.7 | 43.0 | 0.0 |
| Household Distribution by Income Level | 33,715 | 20.3 | 13.5 | 16.5 | 49.6 | 0.0 |
| Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA | | \$61,124 | Median Housing Value | | | \$166,273 |
| | | | Median Gross Rent | | | \$859 |
| | | | Families Below Poverty Level | | | 11.8% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

The AA consists of 24 CTs including six moderate-income CTs (25 percent), 10 middle-income CTs (41.7 percent), and 8 upper-income CTs (33.3 percent). There were no low-income CTs in the AA during the census period covering 2020 and 2021.

The Federal Financial Institutions Examination Council's (FFIEC) updated 2021 median family income for the AA was \$70,250. The following table depicts income categories:

| Median Family Incomes | Low <50% | Moderate 50% to <80% | Middle 80% to <120% | Upper ≥120% |
|--|------------------------|------------------------------------|-----------------------------------|------------------------|
| New Orleans-Metairie, LA MSA Median Family Income (35380) | | | | |
| 2020 & 2021 | <\$35,125 | \$35,125 to <\$56,200 | \$56,200 to <\$84,300 | ≥\$84,300 |
| <i>Source: FFIEC</i> | | | | |

Low-income families earning a median family income less than \$35,125 represented 21.2 percent of families in the AA, while moderate-income families earning between \$35,125 and \$56,199 comprised 16 percent of the AA population. According to 2021 ACS US census data, 11.8 percent of families in the AA earned wages below the poverty level.

Opportunities for residential lending are limited within the six moderate-income CTs in the AA. Of the 37,793 housing units in the AA, approximately 17 percent of the units are owner-occupied housing units, 23 percent are rental units, and 32 percent of housing units are vacant. With average monthly rents of \$859 and the average medium housing price of \$166,273, there is limited demand for residential lending for low- or moderate-income borrowers due to the unaffordability and limited supply of housing.

The following table depicts the demographic information for the AA for 2022.

| Demographic Information of the AA | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| AA: St Charles Parish and St John The Baptist Parish 2022 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (CTs) | 24 | 8.3 | 25.0 | 33.3 | 33.3 | 0.0 |
| Population by Geography | 95,026 | 3.4 | 24.0 | 35.2 | 37.5 | 0.0 |
| Housing Units by Geography | 38,652 | 3.5 | 25.4 | 34.0 | 37.0 | 0.0 |
| Owner-Occupied Units by Geography | 27,768 | 2.8 | 23.4 | 33.4 | 40.5 | 0.0 |
| Occupied Rental Units by Geography | 6,791 | 3.9 | 31.1 | 35.7 | 29.3 | 0.0 |
| Vacant Units by Geography | 4,093 | 7.6 | 29.8 | 35.8 | 26.9 | 0.0 |
| Businesses by Geography | 12,022 | 3.0 | 26.1 | 36.0 | 34.9 | 0.0 |
| Farms by Geography | 268 | 2.2 | 26.5 | 34.0 | 37.3 | 0.0 |
| Family Distribution by Income Level | 25,263 | 22.5 | 16.0 | 18.1 | 43.4 | 0.0 |
| Household Distribution by Income Level | 34,559 | 20.9 | 14.9 | 16.1 | 48.0 | 0.0 |
| Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA | | \$72,053 | Median Housing Value | | | \$179,774 |
| | | | Median Gross Rent | | | \$930 |
| | | | Families Below Poverty Level | | | 9.9% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

The AA consists of 24 CTs including two low-income CTs (8.3 percent), six moderate-income CTs (25 percent), 8 middle-income CTs (33.33 percent), and 8 upper-income CTs (33.33 percent).

The FFIEC updated 2022 median family income for the AA was \$81,800. The following table depicts income categories:

| Table B – Median Family Income Ranges | | | | |
|--|------------------------|------------------------------------|-----------------------------------|------------------------|
| Median Family Incomes | Low <50% | Moderate 50% to <80% | Middle 80% to <120% | Upper ≥120% |
| New Orleans-Metairie, LA MSA Median Family Income (35380) | | | | |
| 2022 | <\$40,900 | \$40,900 to <\$65,440 | \$65,440 to <\$98,160 | ≥\$98,160 |
| <i>Source: FFIEC</i> | | | | |

Low-income families earning a median family income less than \$40,900 represented 22.5 percent of families in the AA, while moderate-income families earning between \$40,900 and \$65,440 comprised 16 percent of the AA population. According to 2022 ACS US census data, 9.9 percent of families in the AA earned wages below the poverty level.

Opportunities for residential lending are limited within the two low- and six moderate-income CTs in the AA. Of the 38,652 housing units in the AA, only 2.8 percent of the owner-occupied housing units are in low-income geographies and only 23.4 percent are in moderate-income geographies. With average monthly rents of \$930 and the average medium housing price of \$179,774, there is limited demand for residential lending for low- or moderate-income borrowers due to the unaffordability and limited supply of housing.

Scope of Evaluation in Louisiana

FNB USA operates in one AA in the State of Louisiana and has mortgage lending as its primary product. Consequently, the only AA received a full-scope review, and we selected a sample of 50 mortgage loans to conduct our analysis.

LENDING TEST

FNB USA'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 USA's performance in the combined AA is good.

Distribution of Loans by Income Level of the Geography

FNB USA exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the State of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of FNB USA's home mortgage loan originations and purchases.

2020-2021

FNB USA exhibits excellent geographic distribution of home mortgage loans in the moderate-income CTs, as lending exceeded both the demographic comparator and aggregate lending. There were no low-income CTs in the AA during the 2020 and 2021 review period.

2022

FNB USA exhibits reasonable geographic distribution in both the low- and moderate-income CTs during the review period. While FNB USA did not make any loans in the low-income CTs, it should be noted that only 2.8 percent of the owner-occupied housing units and only 3.4 percent of the population are in those three low-income CTs. Additionally, FNB USA faces competition in the AA, ranking fifth out of ten financial institutions. The percentage of loans in the moderate-income CTs are only slightly

less than aggregate lending and likewise the result of competition, and is therefore considered reasonable.

Distribution of Loans by Income Level of the Borrower

FNB USA exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered.

Home Mortgage Loans

Refer to Table P in the State of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

2020-2021

FNB USA exhibits reasonable distribution of loans to low-income borrowers as the percentage of loans exceeded aggregate lending in the AA. FNB USA's lending to moderate-income borrowers is likewise reasonable. FNB USA faces stiff competition in the AA, ranking fifth out of ten financial institutions in the AA. Additionally, with a median housing price of \$166,273 and a median gross rent of \$859, moderate-income borrower may be unable to save for the necessary down payment and may be unable to find affordable housing in the AA to purchase.

2022

FNB USA exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered. FNB USA's distribution of mortgage loans to both low- and moderate-income borrowers is reasonable as the percentage of loans to low-income borrowers exceeded aggregate lending and the percentage of loans to moderate-income borrowers exceeded the percentage of families (the comparator) in the AA.

Responses to Complaints

There were no lending related complaints filed during the review period.

Appendix A: Scope of Examination

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

| | | |
|--|-------------------------------|--------------------------|
| Time Period Reviewed: | 01/01/2020 to 12/31/2022 | |
| Bank Products Reviewed: | Home mortgage | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| Not applicable | Not applicable | Not applicable |
| List of AA and Type of Examination | | |
| Rating and AA | Type of Exam | Other Information |
| Louisiana | | |
| Combined AA (St. Charles Parish and St. John the Baptist Parish) | Full-Scope | None |
| | | |
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Appendix B: Summary of AA and State Rating

| FNB USA | |
|------------------|---------------------|
| Overall Bank: | Lending Test Rating |
| | Satisfactory |
| State: Louisiana | |
| | Satisfactory |
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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.

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 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- or 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): 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, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A CT with a median family income that is less than 50 percent.

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 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.

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.

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 CD.

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

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 multistate MSA/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 PE.

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

- Table O. 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 P. 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 multistate MSA/AA. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each AA may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|--------------|------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|
| AA: | 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 |
| Combined AA | 17 | 3,227 | 100 | 3,346 | 0.0 | 0.0 | 0.0 | 17.2 | 17.7 | 12.5 | 44.8 | 23.5 | 41.8 | 38.0 | 58.8 | 45.7 | 0.0 | 0.0 | 0.0 |
| Total | 17 | 3,227 | 0.0 | 3,346 | 0.0 | 0.0 | 0.0 | 17.2 | 17.7 | 12.5 | 44.8 | 23.5 | 41.8 | 38.0 | 58.8 | 45.7 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2022 |
|--|---------------------------|--------------|------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|
| AA: | 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 |
| Combined AA | 15 | 2,532 | 100 | 2,028 | 2.8 | 0.0 | 3.0 | 23.4 | 20.0 | 21.8 | 33.4 | 33.3 | 36.5 | 40.5 | 46.7 | 38.7 | 0.0 | 0.0 | 0.0 |
| Total | 15 | 2,532 | 100 | 2,028 | 2.8 | 0.0 | 3.0 | 23.4 | 20.0 | 21.8 | 33.4 | 33.3 | 36.5 | 40.5 | 46.7 | 38.7 | 0.0 | 0.0 | 0.0 |

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each AA may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|--------------|------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| AA: | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Combined AA | 17 | 3,227 | 100 | 3,346 | 21.2 | 5.9 | 5.0 | 16.0 | 11.8 | 16.5 | 19.7 | 52.9 | 19.5 | 43.0 | 29.4 | 35.8 | 0.0 | 0.0 | 23.2 |
| Total | 17 | 3,227 | 100 | 3,346 | 21.2 | 5.9 | 5.0 | 16.0 | 11.8 | 16.5 | 19.7 | 52.9 | 19.5 | 43.0 | 29.4 | 35.8 | 0.0 | 0.0 | 23.2 |

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2022 |
|--|---------------------------|--------------|------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| AA: | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Combined AA | 15 | 2,532 | 100 | 2,028 | 22.5 | 13.3 | 5.4 | 16.0 | 20.0 | 22.6 | 18.1 | 33.3 | 25.0 | 43.4 | 33.3 | 25.7 | 0.0 | 0.0 | 21.2 |
| Total | 15 | 2,532 | 100 | 2,028 | 22.5 | 13.3 | 5.4 | 16.0 | 20.0 | 22.6 | 18.1 | 33.3 | 25.0 | 43.4 | 33.3 | 25.7 | 0.0 | 0.0 | 21.2 |

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each AA may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.