



PUBLIC DISCLOSURE

December 2, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Relyance Bank, National Association
Charter Number 15482

912 South Poplar St.
Pine Bluff, Arkansas 71611

Office of the Comptroller of the Currency

Little Rock Field Office
1401 West Capitol Ave. Ste 350
Little Rock, Arkansas 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 (LMI) 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 **Satisfactory**.

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on a full scope review of the Little Rock metropolitan statistical area (MSA) and Pine Bluff MSA assessment areas (AAs) and limited scope reviews of the Hot Springs MSA and Dallas County non-MSA AAs in the state of Arkansas.
- The loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of loans originated inside the bank's AAs.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AAs.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.
- Community Development (CD) activities, including lending, investing, donating, and serving, reflect excellent responsiveness to the credit and CD needs of the bank's AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable.

Relyance Bank, National Association's (Relyance) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 95.27 percent over the last 14 quarters. We compared the bank's LTD ratio to five similarly situated banks in their market areas. The aggregate average LTD ratio for the competing banks was 84.24 percent, with a low average of 58.91 percent and a high average of 111.21 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 89.6 percent by number and 87.6 percent by dollar volume of its total loans inside the bank's AAs 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 Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	503	88.7	64	11.3	567	82,700	85.8	13,714	14.2	96,415
Small Business	56	93.3	4	6.7	60	15,860	97.6	396	2.4	16,256
Small Farm	53	88.3	7	11.7	60	8,280	88.7	1,053	11.3	9,333
Consumer	57	95.0	3	5.0	60	244	94.9	13	5.1	257
Total	669	89.6%	78	10.4%	747	\$107,084	87.6%	\$15,176	12.4%	\$122,261

*Source: Evaluation Period: 4/5/2016 – 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

Description of Institution

Relyance is a \$825 million bank headquartered in Pine Bluff, Arkansas and owned entirely by holding company, Jefferson Bancshares, Inc. Relyance operates 20 branches in Arkansas. The bank has no affiliates or subsidiaries.

Relyance has one rating area, the state of Arkansas, with four AAs: Pine Bluff MSA – Jefferson and Lincoln Counties; Little Rock MSA – Pulaski, Saline, and Grant Counties; Hot Springs MSA – Garland County; and the Dallas County non-MSA AA. The main office and seven branch locations are in the Pine Bluff MSA. The Little Rock MSA contains six branches; the Hot Springs MSA has five branches; and the Dallas County non-MSA AA has one branch.

In March 2018, Relyance closed a purchase and assumption transaction to acquire three branch facilities along with deposit accounts and certain loans of Heartland Bank in Bryant, Fordyce, and Sheridan, Arkansas. This transaction expanded the bank's AAs to include the non-MSA of Dallas County. Given the date of the transaction, lending and investments in the Dallas County AA were not reviewed for years 2016 or 2017.

The bank's business strategy focuses on real estate and commercial lending. As of year-end 2018, the loan portfolio represented approximately 78 percent of total assets and consisted of primarily real estate secured loans (76 percent of total loans); agricultural loans (13 percent of total loans); and commercial loans (8 percent of total loans). Agricultural lending is concentrated in the Pine Bluff MSA AA. The Little Rock MSA and Hot Springs MSA AAs reflect more commercial and consumer lending activities. Relyance offers various loan and deposit products along with traditional banking services to meet the needs of its AAs.

Relyance does not have any legal or financial impediments that limit its ability to meet the credits needs within its AAs. As of December 31, 2018, the bank reported total assets of \$825.62 million, including gross loans of \$653.84 million and investments of \$94.90 million. Deposits totaled \$689.41 million, and tier 1 capital was \$98.88 million, or 12.05 percent of adjusted average assets. The prior CRA performance evaluation was dated April 4, 2016, with a rating of Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners reviewed the bank's performance using the intermediate small bank examination procedures for CRA. The evaluation period was April 5, 2016, through December 31, 2018. For the years of 2016 and 2017, examiners sampled business loans in the three AAs at those times: Hot Springs MSA; Little Rock MSA; and Pine Bluff MSA. For 2018, examiners sampled business loans in all four AAs. Examiners sampled farm loans in the Pine Bluff MSA for all three years. Given the limited volume of agricultural lending in the Hot Springs and Little Rock MSA AAs, examiners sampled consumer originations for 2016, 2017, and 2018. Examiners reviewed the consumer originations within Dallas County non-MSA AA for 2018.

Selection of Areas for Full-Scope Review

Examiners selected the Pine Bluff MSA AA and the Little Rock MSA AA for full-scope reviews based on lending volume and market share of deposits. Examiners reviewed a spreadsheet containing all originations during the review period to identify the AAs with the largest volume of commercial and consumer lending. Each MSA is reviewed separately from the other, and non-MSA AAs are combined and evaluated as a single area. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the AA ratings within the state of Arkansas.

Relyance does not operate in any multi-state AAs. Relyance designated four AAs – Pine Bluff MSA (Jefferson and Lincoln Counties); Little Rock MSA (Grant, Pulaski, and Saline Counties); Hot Springs MSA (Garland County); and Dallas County non-MSA AA. Relyance is a Home Mortgage Disclosure Act (HMDA) reporting institution. Examiners reviewed the bank's HMDA data submission for integrity and accuracy prior to the performance of this activity. To assess the bank's performance under the Lending Test, examiners reviewed a sample of small business loans for all AAs; small farm loans for the Pine Bluff MSA AA; and consumer loans for the Little Rock MSA AA, Hot Springs MSA AA, and Dallas County non-MSA AA.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution 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.

State Rating

State of Arkansas

CRA rating for the State of Arkansas: Satisfactory

The Lending Test is rated: Satisfactory :

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AAs.
- The distribution of loans to farms and businesses of different sizes is reasonable.
- CD lending reflects excellent responsiveness to the credit and CD needs of the bank's AAs.
- CD investments reflect adequate responsiveness to the credit and CD needs of the bank's AAs.
- CD services reflect excellent responsiveness to the credit and CD needs of the bank's AAs.

Description of Institution's Operations in Arkansas

Relyance operates 20 branches within the state of Arkansas and has four AAs: the Pine Bluff MSA AA; the Little Rock MSA AA; the Hot Springs MSA AA; and the Dallas County non-MSA AA. The bank was founded and operated several decades in the Pine Bluff MSA before entering the Hot Springs MSA via a bank acquisition in 2013. Relyance entered the Little Rock MSA via branch facility acquisitions in 2014 and the Dallas County non-MSA AA similarly in 2018.

Given the bank's history in the Pine Bluff MSA, deposit market share is most significant in this area. As of June 30, 2018, the bank's total deposits were \$664.39 million with 58.4 percent in the Pine Bluff MSA; 28.1 percent in the Little Rock MSA; 10.3 percent in the Hot Springs MSA; and 3.3 percent in the Dallas County non-MSA AA. As of June 30, 2018, the bank held the second largest share of deposits in the Pine Bluff market at \$387.73 million, or 11.53 percent of the market. As such, examiners chose these areas for full-scope reviews and assessed performance in the Hot Springs MSA and Dallas County non-MSA AA under limited-scope.

The bank's primary lending products within the Pine Bluff MSA are real estate lending, agricultural lending, and small business lending. The primary lending products within the Little Rock and Hot Springs MSAs are real estate lending, commercial lending, and consumer installment lending. The Little Rock MSA contains fewer agricultural purpose properties and borrowers in general. Although the bank is a HMDA reporting institution, 1-4 family residential real estate secondary market originations are not a primary product or strategic focus.

Pine Bluff MSA – Jefferson and Lincoln Counties

The Pine Bluff MSA consists of three counties: Cleveland, Jefferson, and Lincoln. The bank includes only two – Jefferson and Lincoln in its AA. As of the 2015 American Community Survey (ACS), the AA consisted of 28 census tracts (CTs) with a total population of 87,610 people. 2015 data shows one low-income CTs; eight moderate-income CTs; 15 middle-income CTs; three upper-income CTs; and one CT with no income available. The AA is appropriate given the bank's branch system; includes only whole CTs; and does not arbitrarily exclude any low or moderate income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Relyance - Pine Bluff MSA (2018)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	3.6	28.6	53.6	10.7	3.6
Population by Geography	87,610	2.3	23.4	54.9	17.3	2.1
Housing Units by Geography	38,018	3.4	21.8	57.6	17.2	0.1
Owner-Occupied Units by Geography	20,806	2.2	15.2	59.0	23.6	0.0
Occupied Rental Units by Geography	11,353	4.0	29.2	56.5	10.2	0.1
Vacant Units by Geography	5,859	6.2	30.8	54.6	8.2	0.2
Businesses by Geography	3,599	4.7	23.3	53.3	18.7	0.1
Farms by Geography	312	0.6	22.8	68.9	7.7	0.0
Family Distribution by Income Level	20,300	25.1	15.2	17.9	41.9	0.0
Household Distribution by Income Level	32,159	27.1	15.5	15.6	41.8	0.0
Median Family Income MSA - 38220 Pine Bluff, AR MSA		\$47,667	Median Housing Value			\$79,539
			Median Gross Rent			\$648
			Families Below Poverty Level			19.9%
<i>Source: 2015 ACS Census and 2018 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>						

Economic conditions in the AA are depressed with 19.9 percent of families and 23.3 percent of households below the poverty level. The 2015 ACS US Census indicates 6.8 percent and 28.5 percent of households within the LMI CTs, respectively, have income below the poverty level. Affordable housing opportunities within the AA are limited. Per data, the low-income CT consists of 2.2 percent owner-occupied residences; 3.9 percent renter-occupied residences; and 6.3 percent vacant units. Similarly, the moderate-income CTs contain 15.2 percent owner-occupied residences; 29.2 percent renter-occupied residences; and 30.8 percent vacant units. Notably, the middle-income CTs within this AA consist of 54.6 percent vacant units. Other demographic data indicates 36.1 percent of households receive Social Security; 10.3 percent receive public assistance; and 18.1 percent are retired. At 5.9 percent, the AA's unemployment rate is higher than the state-wide average of 3.5 percent and the nationwide average of 4.0 percent, both as of June 2018. This indicates that many residents live on fixed and/or limited incomes, reducing lending opportunity and demand for consumer credit within the AA. In addition, 14.4 percent of individuals are over 65 years of age. This demographic group does not generally have a high demand for credit.

Major industries in the AA are services; retail trade; agricultural, forestry, & fishing; and finance, insurance, and real estate. Agriculture is a significant portion of the local economy at 7.9 percent of businesses. The services industry is the largest at 40.9 percent of businesses.

Banking competition within the AA is moderate. There are seven banks in the Pine Bluff MSA AA: four Arkansas based community banks; one locally based mid-size bank; and one nation-wide large bank. As of June 30, 2018, Relyance had the second largest share of deposits at 11.53 percent.

Examiners consulted the Assistant Executive Director of the Pine Bluff Housing Authority to better understand the general credit and community development needs and local economic conditions. The

contact noted many commercial sectors needing improvement with the most depressed sectors being retail, residential housing, and dining establishments. As these sectors are the primary needs in the area, types of credit that would assist the community's improvement efforts include new/existing housing loans and loans to small businesses. These types of credit are currently available at many financial institutions in the area. In addition, the City of Pine Bluff Economic and Community Development Department (PB ECDD) and the Arkansas Development Finance Authority (ADFA) offer programs to meet these needs. The ADFA administers several programs for LMI individuals and community development including: home rental housing; homeless permanent housing; and the Model Block Commercial program. The ADFA promotes economic growth throughout the state of Arkansas. No discriminatory practices were noted in the area.

Little Rock MSA – Grant, Pulaski, and Saline Counties

The Little Rock MSA consists of six counties: Faulkner, Grant, Lonoke, Perry, Pulaski, and Saline. Relyance includes three of the six counties in its AA: Grant, Pulaski, and Saline. According to the 2015 ACS Census, the total population of the AA was 522,350 people. The AA includes 120 CTs, of which ten are low-income; 31 are moderate-income; 41 are middle-income; 36 are upper-income; and two do not have income information available. The AA is appropriate given the bank's branch system; includes only whole CTs; and does not arbitrarily exclude any low-or moderate-income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Relyance - Little Rock MSA (2018)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	120	8.3	25.8	34.2	30.0	1.7
Population by Geography	522,350	5.6	21.9	38.8	33.1	0.6
Housing Units by Geography	234,091	6.0	22.9	37.6	32.8	0.6
Owner-Occupied Units by Geography	130,737	3.1	18.2	41.4	36.9	0.4
Occupied Rental Units by Geography	72,661	9.2	28.6	32.6	28.7	1.0
Vacant Units by Geography	30,693	11.1	29.4	33.2	25.2	1.1
Businesses by Geography	36,867	5.5	20.7	28.8	44.8	0.2
Farms by Geography	956	2.3	14.5	36.2	47.0	0.0
Family Distribution by Income Level	128,224	21.8	17.7	19.2	41.2	0.0
Household Distribution by Income Level	203,398	24.7	16.3	18.2	40.8	0.0
Median Family Income MSA - 30780 Little Rock-North Little Rock-Conway, AR MSA		\$61,339	Median Housing Value			\$147,423
			Median Gross Rent			\$777
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS Census and 2018 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>						

Economic conditions in the AA are moderate with 10.7 percent of families and 14.2 percent of households below the poverty level. More specifically, the 2015 ACS Survey indicates 37.3 percent of households within the low-income CTs and 21.3 percent of households within the moderate-income CTs have incomes

below the poverty level. There is a low number of owner-occupied housing properties within the LMI geographies. This could potentially cause greater difficulty for LMI borrowers to find affordable ownership opportunities. Demographic data indicates a higher unemployment rate in the area compared to nation-wide and state levels in 2018. The MSA's 2018 unemployment rate of 4.5 percent is higher than the nation-wide unemployment rate of 4.0 percent and state-wide of 3.5 percent, both as of June 2018. Demographic data also indicates 17.9 percent of households are retired; 30.9 percent of households receive Social Security; and 13.9 percent of the population is over 65 years of age. These demographic groups generally do not have a high demand for credit.

Major industries for the AA are services; retail trade; and finance, insurance, and real estate. Agriculture is not a significant part of the economy at only 2.5 percent of businesses.

Banking competition within the AA is strong. As of June 30, 2018, there were 31 banks represented through 217 branch locations in the AA. The 31 banks include two large, nation-wide banks (Bank of America and US Bank); eight mid-size, regional banks; and 21 small regional or community banks. As of June 30, 2018, Relyance held \$186.75 million in deposits, or 1.09 percent of the Little Rock market deposits.

Examiners consulted one contact in the AA to better understand the general credit and community development needs as well as local economic conditions. The contact stated the Little Rock downtown district is back to life with new restaurants and night spots. The contact indicated a desire to see economic development spread through the city so as to benefit all residents and reports banks having a high level of involvement in the community. The banks continue to compete for commercial deposit and loan customers. The contact identified a shortage of affordable housing opportunities for both ownership and rental and noted several vacant houses with potential for rehabilitation throughout the city.

Scope of Evaluation in Arkansas

Examiners identified two AAs receiving full-scope reviews – Pine Bluff MSA and Little Rock MSA. The Hot Springs MSA and Dallas County non-MSA AA received limited-scope reviews. For purposes of this evaluation, MSAs are reviewed separately, and all non-MSA AAs within the same state are combined, analyzed, and presented as one AA. Refer to the table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arkansas

LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated Satisfactory.

Based on full-scope reviews for the Pine Bluff MSA AA and the Little Rock MSA AA and limited-scope reviews for the Hot Springs MSA AA and the Dallas County non-MSA AA, the bank's lending performance in the state of Arkansas is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of Arkansas.

Home Mortgage Loans

Refer to table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of loans across geographies of different income levels is reasonable relative to the performance context of the bank's AAs.

The geographic distribution of loans across geographies of different income levels reflects reasonable distribution in the Pine Bluff MSA AA. In 2016, the bank did not originate or purchase home mortgage loans in the low-income CT. The percentage of home mortgages originated or purchased in moderate-income CTs was somewhat lower than the percentage of owner-occupied housing units in the AA, though bank lending exceeded aggregate lending to moderate-income CTs. In 2017-2018, the percentage of home mortgages originated or purchased in low-income CTs exceeded both the percentage of owner-occupied housing units and aggregate lending in low-income CTs. In the same year, the percentage of home mortgages originated or purchased in moderate-income CTs was near to the percentage of owner-occupied housing units and exceeded aggregate lending to moderate-income CTs.

The geographic distribution of loans across geographies of different income levels reflects reasonable distribution in the Little Rock MSA AA. In 2016, the bank did not originate or purchase home mortgage loans in low-income CTs within the AA. The percentage of home mortgages originated or purchased in moderate-income CTs was near to the percentage of owner-occupied housing units in the AA and exceeded aggregate lending to moderate-income CTs in the AA. In 2017-2018, the percentage of home mortgages originated or purchased in low-income CTs was somewhat lower than the percentage of owner-occupied housing units in the AA, though bank lending exceeded aggregate lending to low-income CTs. In the same time, the percentage of home mortgages originated or purchased in moderate-income CTs was lower than the percentage of owner-occupied housing units in the AA. The high poverty level; elevated unemployment rate; and low level of affordable housing options within LMI CTs mitigate the bank's performance.

Small Loans to Businesses

Refer to table Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of loans to small businesses reflects good distribution within the Pine Bluff MSA AA. In 2016, the bank's percentage of loans to businesses exceeded both the percentage of AA businesses and the aggregate distribution of loans in low-income CTs. In the same year, the bank's percentage of loans to businesses was near to the percentage of AA businesses and exceeded the aggregate distribution of loans in moderate-income CTs. In 2017-2018, the bank's percentage of loans to businesses exceeded both the percentage of AA businesses and the aggregate distribution of loans in low-income CTs. In the same time, the bank's percentage of loans to businesses was adequate relative to the percentage of AA businesses and was near to the aggregate distribution of loans in moderate-income CTs.

The geographic distribution of loans to small businesses reflects poor distribution within the Little Rock MSA AA. In 2016, the bank did not lend to businesses in low-income CTs. In the same year, the bank's percentage of loans to businesses was lower than both the percentage of AA businesses and the aggregate distribution of loans in moderate-income CTs. In 2017-2018, the bank's percentage of loans to businesses was lower than the percentage of AA businesses and somewhat lower than the aggregate distribution of

loans in low-income CTs. In the same time, the bank's percentage of loans to businesses was somewhat lower than both the percentage of AA businesses and the aggregate distribution of loans in moderate-income CTs.

Small Loans to Farms

Refer to table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of loans to small farms reflects good distribution for the Pine Bluff MSA AA. In 2016, the bank's percentage of loans to farms exceeded both the percentage of AA farms and the aggregate distribution of loans in low-income CTs. In the same year, the bank's percentage of loans to farms was adequate relative to the percentage of AA business and aggregate distribution of loans in moderate-income CTs. In 2017-2018, the bank did not lend to farms in low-income CTs. In the same time, the bank's percentage of loans to farms exceeded both the percentage of AA farms and the aggregate distribution of loans in moderate-income CTs.

Consumer Loans

Refer to table U in appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of loans to consumers reflects poor distribution within the Little Rock MSA AA. In both 2016 and 2017-2018, the bank did not lend to consumers in low-income CTs. In 2016, the bank's percentage of loans to consumers in moderate-income CTs was somewhat lower than the percentage of AA moderate-income households. In 2017-2018, the bank's percentage of loans was lower than the percentage of AA moderate-income households.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans in the Pine Bluff MSA AA reflects reasonable distribution relative to the performance context of the geography. In 2016, the bank's percentages of mortgage loans originated to LMI borrowers are significantly lower than the percentages of low- and moderate-income families in the AA. In 2017-2018, the bank's percentage of mortgage loans originated to low-income borrowers is significantly less than the percentage of low-income families in the AA. For the same time, the percentage of mortgage loans originated to moderate-income borrowers is near to the percentage of moderate-income families in the geography. The percentage of originations to both LMI borrowers is near to the aggregate lending level for the AA. The high level of poverty, elevated unemployment rate, and low level of owner-occupied housing units mitigate the low percentages of lending to LMI individuals.

The borrower distribution of home mortgage loans in the Little Rock MSA AA reflects reasonable distribution relative to the performance context of the geography. In 2016, the bank did originate any home mortgage loans to low-income borrowers in the geography. The percentage of mortgage loans originated to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The percentage of originations to both LMI borrowers is lower than the aggregate. In 2017 – 2018, the percentages of mortgage loans originated to low-income and moderate-income borrowers are significantly less than the percentages of LMI families in the geography. The low level of owner-occupied housing in LMI geographies along with the high level of poverty and elevated unemployment rate mitigate the bank's distribution of mortgage loans to LMI borrowers.

Small Loans to Businesses

Refer to table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of business loans in the AA reflects excellent distribution within the Pine Bluff MSA AA. In 2016, the bank's percentage of lending to AA small businesses was near to the percentage of reporting AA small businesses with gross annual revenue (GAR) of less than \$1 million. In 2017-2018, the bank's percentage of lending to AA small businesses substantially met the percentage of reporting AA small businesses with GAR of less than \$1 million. For both 2016 and 2017-2018, the bank's percentage of lending exceeded the aggregate percentage of lending in the AA.

The borrower distribution of business loans in the AA reflects excellent distribution for the Little Rock MSA AA. In both 2016 and 2017-2018, the bank's percentage of lending to AA small businesses substantially met the percentage of reporting AA small businesses with GAR of less than \$1 million. For both 2016 and 2017-2018, the bank's percentage of lending exceeded the aggregate percentage of lending in the AA.

Small Loans to Farms

Refer to table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of farm loans in the AA reflects good distribution within the Pine Bluff MSA AA. In 2016, the bank's percentage of lending to AA small farms was somewhat lower than the percentage of reporting AA small farms with GAR of less than \$1 million. In 2017-2018, the bank's percentage of lending to AA small farms substantially met the percentage of reporting AA small farms with GAR of less than \$1 million. For both 2016 and 2017-2018, the bank's percentage of lending exceeded the aggregate percentage of lending in the AA.

Consumer Loans

Refer to table V in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans in the AA reflects excellent distribution within the Little Rock MSA AA. In 2016, the bank's percentage of lending to low-income AA consumers exceeded the percentage of reporting low-income households. In the same year, the bank's percentage of lending to

moderate-income AA consumers was significantly lower than the percentage of reporting AA moderate-income consumers. This is mitigated by the number of AA moderate-income census tracts as well as the number of loans in the Little Rock AA during the 2016 sample. In 2017-2018, the banks percentage of lending to LMI AA consumer exceeded both the percentage of reporting AA LMI consumers.

Responses to Complaints

Relyance has an appropriate and adequate process for receiving, responding, and tracking CRA related customer complaints. The OCC did not receive any CRA related complaints during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited scope review, the bank's performance under the Lending Test in the Hot Springs MSA AA and the Dallas County non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Arkansas is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in its AAs through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

Number and Amount of Community Development Loans

Refer to the Lending Activity tables below for the facts and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

In total, the bank originated 34 CD loans totaling \$37.3 million during the evaluation period.

The level of qualified CD loans in the Pine Bluff MSA AA represents a high level of community development. The bank originated 17 CD loans totaling \$19.8 million in the Pine Bluff MSA AA during the evaluation period. Key lending in the AA included loans for multi-family housing properties for LMI individuals and lending for general stores in underserved tracts. Significant lending activity included several loans financing the purchase of multi-family housing properties, rental properties, and the re-financing of an apartment complex in an LMI geography.

The level of qualified CD loans in the Little Rock MSA AA represents a high level of community development. The bank originated 12 CD loans totaling \$9.5 million in the Little Rock MSA AA during the evaluation period. Key lending in the AA included loans for multi-family housing properties for LMI individuals; loans for the renovation and construction of buildings that will improve LMI tracts; and lending for general stores in underserved tracts. Significant lending activity included financing of the construction of the Little Rock Technology park; financing the construction of Dollar General stores; and financing of the purchase of a building in a declining area of Little Rock.

Number and Amount of Qualified Investments

Qualified Community Development Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Pine Bluff MSA	4	755	14	1,472	18	90.0	2,227	69.6
Hot Springs MSA	1	340	0	-	1	5.0	340	10.6
Dallas County non-MSA AA	-	-	1	635	1	5.0	635	19.8
Little Rock MSA AA	-	-	-	-	-	-	-	-
Total	5	1,075	15	2,105	20	100.00	3,200	100.0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Relyance demonstrated adequate responsiveness to CD needs through qualified investment activities within the Pine Bluff MSA and Little Rock MSA AAs during the evaluation period. During the evaluation period, Relyance purchased four municipal investments totaling \$1.47 million and benefitting the Pine Bluff MSA AA. In addition, three prior period purchases had outstanding balances totaling \$755 thousand. These seven instruments included funding for community services for LMI individuals or school district activities in LMI CTs within the Pine Bluff MSA AA. In 2018, the bank partnered with the Jefferson County CDC for the Partnership Grant Program Award with the Federal Home Loan Bank of Dallas. Ten persons received funds totaling \$62 thousand for improvements to their home through the Special Needs Assistance Program. The bank contributed services and \$1,800 in cash grants for this activity. During the evaluation period, the bank did not purchase any CD purpose investments in the Little Rock MSA AA.

Extent to Which the Bank Provides Community Development Services

Relyance demonstrated excellent responsiveness to CD needs by offering qualifying services to LMI individuals within its AAs during the evaluation period. Bank officers and employees routinely provide technical assistance and financial services through serving on boards, committees, or as members of organizations providing community services to LMI individuals. Examples are food banks, child advocacy organizations, homeless shelters, and LMI individual targeted medical care.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited scope review, the bank's performance under the CD Test in the Hot Springs MSA AA and Dallas County non-MSA AA is consistent with the bank's overall performance under the CD test in the full scope areas.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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:	April 5, 2016, to December 31, 2018	
Bank Products Reviewed:	Pine Bluff MSA: Home mortgage, small business, and small farm Little Rock MSA; Hot Springs MSA; and Dallas County non-MSA AA: Home mortgage, small business, and consumer loans All AAs: Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Arkansas		
Pine Bluff MSA	Full-scope	Jefferson and Lincoln counties
Little Rock MSA	Full-scope	Grant, Pulaski, and Saline counties
Hot Springs MSA	Limited-scope	Garland county
Non-MSA AA	Limited-scope	Dallas county

Appendix B: Summary of MMSA and State Ratings

RATINGS Relyance Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Relyance Bank, National Association	Satisfactory	Outstanding	Satisfactory
State:			
Arkansas	Satisfactory	Outstanding	Satisfactory

(*) The Lending Test and Community Development 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/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts 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 LMI 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.

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), 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 census tract 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/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. 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 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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 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 metropolitan statistical areas, 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th 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. 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 MMSA/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 that were 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) in those geographies. Because aggregate small business data are 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 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 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. 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 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 (loans less than or equal to \$500 thousand) 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 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 in 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 MMSA/assessment area.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Charter Number: 15482

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 \$(000s)	% 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
Hot Springs MSA AA	44	4,111	28.9	3,079	1.2	0.0	1.0	11.6	11.4	7.6	55.4	59.1	51.9	31.7	29.5	39.5	0.0	0.0	0.0
Little Rock MSA AA	36	8,011	23.7	18,960	3.6	0.0	1.7	18.7	16.7	10.5	44.7	36.1	45.6	33.0	47.2	42.2	0.0	0.0	0.0
Pine Bluff MSA AA	72	11,045	47.4	1,342	2.3	0.0	0.7	26.9	19.4	10.9	32.2	43.1	31.8	38.7	37.5	56.6	0.0	0.0	0.0
Total	152	23,167	100.0	23,381	3.0	0.0	1.5	18.8	16.4	10.4	45.1	46.1	45.6	33.1	37.5	42.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

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 (\$000s)	% 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
Dallas County AA	1	19	0.6	98	0.0	0.0	0.0	0.0	0.0	0.0	77.2	100.0	71.4	22.8	0.0	28.6	0.0	0.0	0.0
Hot Springs MSA AA	107	15,759	30.5	3,096	3.4	7.5	3.5	11.8	11.2	9.2	49.1	46.7	45.2	35.6	34.6	42.0	0.0	0.0	0.0
Little Rock MSA AA	83	17,592	23.6	16,118	3.1	2.4	1.7	18.2	8.4	12.5	41.4	34.9	41.9	36.9	54.2	43.9	0.4	0.0	0.1
Pine Bluff MSA AA	160	26,164	45.6	1,263	2.2	2.5	0.8	15.2	14.4	5.7	59.0	63.1	57.6	23.6	20.0	35.9	0.0	0.0	0.0
Total	351	59,533	100.0	20,575	3.0	4.0	1.9	16.7	12.0	11.5	45.0	51.6	43.5	35.0	32.5	43.0	0.3	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

2016																			
Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			
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 (\$000s)	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hot Springs MSA AA	44	4,111	28.9	3,079	20.8	0.0	5.9	17.3	6.8	14.1	21.1	13.6	20.1	40.9	54.5	40.6	0.0	25.0	19.3
Little Rock MSA AA	36	8,011	23.7	18,960	21.6	0.0	5.9	17.9	5.6	14.5	20.2	11.1	18.2	40.4	22.2	36.6	0.0	61.1	24.8
Pine Bluff MSA AA	72	11,045	47.4	1,342	22.6	1.4	3.1	17.1	8.3	14.1	18.5	16.7	18.9	41.9	51.4	35.8	0.0	22.2	28.1
Total	152	23,167	100.0	23,488	21.6	0.7	5.8	17.7	7.2	14.4	20.1	14.5	18.5	40.6	45.4	37.1	0.0	32.2	24.3

Source: 2010 U.S Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

2017-2018																			
Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			
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 (\$000s)	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas County AA	1	19	0.6	98	18.1	0.0	7.1	19.0	100.0	15.3	22.6	0.0	12.2	40.3	0.0	44.9	0.0	0.0	20.4
Hot Springs MSA AA	107	15,759	30.5	3,096	23.2	1.9	6.0	16.8	7.5	13.6	19.6	9.3	17.9	40.4	47.7	44.5	0.0	33.6	18.1
Little Rock MSA AA	83	17,592	48.5	16,118	21.8	1.2	5.5	17.7	2.4	16.6	19.2	6.0	19.8	41.2	39.8	36.1	0.0	50.6	22.1
Pine Bluff MSA AA	160	26,164	45.6	1,263	25.1	1.9	2.7	15.2	10.0	13.9	17.9	10.0	18.4	41.9	41.9	37.7	0.0	36.3	27.3
Total	351	59,533	100.0	20,575	22.4	1.7	5.4	17.3	7.7	16.0	19.2	8.8	19.4	41.2	43.0	37.5	0.0	38.7	21.8

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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																				2016
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	Overall Market (\$000s)	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	
Hot Springs MSA AA	14	3,232	26.4	2,188	1.5	0.0	1.6	19.2	28.6	18.3	48.2	57.1	50.2	31.0	14.3	29.9	0.0	--	0.0	
Little Rock MSA AA	20	5,873	37.7	10,401	5.2	0.0	4.5	26.6	10.0	21.1	35.7	15.0	37.7	32.6	75.0	36.6	0.0	0.0	0.0	
Pine Bluff MSA AA	19	5,305	35.8	980	5.2	10.5	4.3	30.9	26.3	24.9	35.6	42.1	43.5	28.3	21.1	27.3	0.0	0.0	0.0	
Total	53	14,410	100.0	13,690	4.6	3.5	4.0	26.4	21.6	21.2	37.3	38.1	40.2	31.7	36.8	34.6	0.0	0.0	0.0	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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																				2017-2018
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	Overall Market	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	% Bus.	% Bank Loans	Aggregate	
Dallas County AA	4	233	3.3	116	0.0	--	0.0	0.0	0.0	0.0	87.2	100.0	81.0	12.8	0.0	19.0	0.0	--	0.0	
Hot Springs MSA AA	38	3,890	31.1	2321	6.6	5.3	5.9	19.5	7.9	19.1	45.6	60.5	41.8	28.3	26.3	33.2	0.0	--	0.0	
Little Rock MSA AA	40	11,638	32.8	10,388	5.5	2.5	4.6	20.7	12.5	19.5	28.8	30.0	29.2	44.8	55.0	46.6	0.2	0.0	0.1	
Pine Bluff MSA AA	40	3,755	32.8	914	4.7	5.0	5.0	23.3	17.5	19.9	53.3	57.5	54.2	18.7	20.0	20.9	0.1	0.0	0.0	
Total	122	19,516	100.0	13,739	5.5	3.2	4.8	20.6	9.5	19.3	33.3	62.0	33.4	40.4	25.3	42.4	0.2	0.0	0.1	

*Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 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											2016	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Hot Springs MSA AA	14	3,232	26.4	2,188	83.4	57.1	38.7	5.3	42.9	11.3	0.0	
Little Rock MSA AA	20	5,873	37.7	10,401	80.9	75.0	44.1	6.7	25.0	12.4	0.0	
Pine Bluff MSA AA	19	5,305	35.8	980	78.6	68.4	40.1	5.0	15.8	16.4	15.8	
Total	53	14,410	100.0	13,690	80.9	66.9	42.7	6.4	27.9	12.6	5.3	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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											2017-2018	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Dallas County AA	4	233	3.3	116	69.3	25.0	15.5	10.1	50.0	20.5	25.0	
Hot Springs MSA AA	38	3,890	31.1	2,321	82.9	76.3	42.3	5.4	13.2	11.8	13.2	
Little Rock MSA AA	40	11,638	32.8	10,388	80.5	72.5	44	6.8	20.0	12.7	20.0	
Pine Bluff MSA AA	40	3,755	32.8	914	77.4	72.5	37.6	5.6	17.5	17	17.5	
Total	122	19,516	100.0	13,739	80.5	61.6	43.1	6.6	25.2	12.9	18.9	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Hot Springs MSA AA	--	--	--	12	0.0	--	0.0	8.7	--	16.7	45.9	--	50	45.3	--	33.3	0.0	--	0.0
Little Rock MSA AA	--	--	--	120	3.4	--	3.3	16.1	--	15	40.4	--	44.2	40.1	--	37.5	0.0	--	0.0
Pine Bluff MSA AA	20	3,434	100.0	189	0.9	5.0	0.0	43.6	25.0	46	41.7	65.0	43.9	13.7	5.0	10.1	0.0	0.0	0.0
Total	20	3,434	100.0	322	2.4	5.0%	1.2	21.8	25.0	33.2	41.6	65.0	44.4	34.2	5.0	21.1	0.0	0.0	0.0

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas County AA	--	--	--	3	0.0	--	0.0	0.0	--	0.0	86.7	--	33.3	13.3	--	66.7	0.0	--	0.0
Hot Springs MSA AA	--	--	--	32	0.0	--	0.0	12.4	--	3.1	41.4	--	25	46.2	--	71.9	0.0	--	0.0
Little Rock MSA AA	--	--	--	111	2.3	--	1.8	14.5	--	9.9	36.2	--	60.4	47	--	27.9	0.0	--	0.0
Pine Bluff MSA AA	40	6,134	100.0	200	0.6	0.0	0.0	22.8	30.0	25	68.9	55.0	63.5	7.7	15.0	11.5	0.0	0.0	0.0
Total	40	6,134	100.0	346	1.6	0.0	0.6	15.9	30.0	17.9	44.3	55.0	58.7	38.2	15.0	22.8	0.0	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dallas County AA	--	--	--	3	100	--	66.7	0.0	--	0.0	--
Hot Springs MSA	--	--	--	32	97.8	--	75	1.6	--	0.5	--
Little Rock MSA	--	--	--	111	96.5	--	71.2	1.8	--	1.7	--
Pine Bluff MSA	40	6,134	100.0	200	96.8	87.5	55	1.6	2.5	1.6	10.0
Total	40	6,134	100.0	346	96.8	87.5	62.1	1.7	2.5	1.5	10.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dallas County AA	--	--	--	1	100	--	0.0	0.0	--	0.0	--
Hot Springs MSA AA	--	--	--	12	97.1	--	83.3	2.3	--	0.6	--
Little Rock MSA AA	--	--	--	120	96.7	--	57.5	1.8	--	1.5	--
Pine Bluff MSA AA	20	3,434	100.0%	189	97.8	50.0	41.8	0.6	30.0	1.6	20.0
Total	20	3,434	100.0%	322	97	50.0	49.1	1.6	30.0	1.4	20.0

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

Table U - Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Hot Springs MSA AA	20	277	74.1	2.0	0.0	15.8	15.0	52.8	45.0	29.4	29.6	0.0	0.0	
Little Rock MSA AA	7	694	25.9	6.2	0.0	22.1	14.3	42.4	42.9	29.4	11.1	0.0	0.0	
Pine Bluff MSA AA	--	--	--	3.1	--	31.6	--	34.0	--	31.2	--	0.0	--	
Total	27	971	100.0	5.1	0.0	22.6	14.6	43.0	43.9	29.3	20.4	0.0	0.0	

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

Table U - Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Dallas County AA	20	79	20.2	0.0	0.0	0.0	0.0	80.9	95.0	19.1	5.0	0.0	0.0	
Hot Springs MSA AA	39	437	39.4	5.8	0.0	15.5	7.7	46.8	38.5	31.9	53.8	0.0	0.0	
Little Rock MSA AA	40	390	40.4	5.3	0.0	21.9	7.5	38.3	50.0	33.9	42.5	0.6	0.0	
Pine Bluff MSA AA	--	--	--	2.8	--	20.1	--	58.1	--	18.9	--	0.0	--	
Total	99	906	100.0	5.0	0.0	20.5	5.1	42.3	61.2	31.7	33.8	0.4	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.
Due to rounding, totals may not equal 100.0

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Hot Springs MSA AA	20	277	74.1	23.1	5.0	16.5	5.0	18.5	15.0	41.8	35.0	0.0	40.0	
Little Rock MSA AA	7	694	25.9	23.6	42.9	16.6	0.0	18.0	28.6	41.7	14.3	0.0	14.3	
Pine Bluff MSA AA	--	--	--	26.8	--	14.0	--	17.6	--	41.5	--	0.0	--	
Total	27	971	100.0	24.0	23.9	16.3	2.5	18.1	21.8	41.6	24.6	0.0	27.1	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Dallas County AA	20	79	20.2	22.7	25.0	18.4	40.0	19.2	5.0	39.8	20.0	0.0	10.0	
Hot Springs MSA	39	437	39.4	24.5	28.2	15.7	12.8	16.8	7.7	43.0	33.3	0.0	17.9	
Little Rock MSA	40	390	40.4	24.8	25.0	16.3	25.0	18.2	22.5	40.8	25.0	0.0	2.5	
Pine Bluff MSA	--	--	--	27.1	--	15.5	--	15.6	--	41.8	--	0.0	--	
Total	99	906	100.0	25.0	26.1	16.1	25.9	17.7	11.7	41.2	26.1	0.0	10.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.
Due to rounding, totals may not equal 100.0