



PUBLIC DISCLOSURE

April 15, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank
Charter Number 10004

200 West Court Street
Paragould, AR 72450

Office of the Comptroller of the Currency

1401 West Capitol Avenue, Suite 350
Little Rock, AR 72201

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

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Overall CRA Rating

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 the combination of each of the full-scope assessment areas (AAs).
- The Community Development (CD) Test rating is based on the combination of each of the full-scope AAs.
- The Loan to Deposit (LTD) ratio is more than reasonable.
- A substantial majority of the bank's loans were made inside its AAs.
- The geographic distribution of loans and distribution of loans to borrowers with different incomes and businesses of different sizes is reasonable.
- CD lending and investments is excellent.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. The bank's quarterly LTD ratio since the previous CRA evaluation averaged 103.14 percent. We compared the bank's LTD ratio to four similarly situated institutions operating in the areas. The aggregate average LTD ratio for the other institutions was 87.66 percent, with a low average of 57.01 percent and a high average of 108.81 percent.

Lending in Assessment Area

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

The bank originated and purchased 84.60 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank level 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	1,570	84.1	297	15.9	1,867	246,649	77.4	72,125	22.6	318,774
Commercial Loans	87	95.6	4	4.4	91	1,798	96.5	68	3.5	1,866
Total	1,657	84.6	301	15.4	1,958	248,447	77.5	72,193	22.5	320,640

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0

Description of Institution

First National Bank (FNB) is a \$1.625 billion institution headquartered in Paragould, AR. Paragould is located in Greene County in the northeastern part of the state. FNB operates in four AR market areas: northeast AR, northwest AR, north central AR, and central AR. The bank's presence in the northeastern part of the state includes Clay, Craighead, and Greene Counties. It has a presence in the northwestern part of the state including Benton and Washington Counties. The north central market presence is in Cleburne County, and the central market consists of Pulaski County. As of December 31, 2018, FNB had loans totaling \$1.289 billion, or 79.30 percent of total assets. Holding company First Paragould Bankshares, Inc. owns 100 percent of FNB. In July 2018, the holding company purchased One Bank and Trust, N.A. (One Bank) in Little Rock, AR and merged it into FNB. With the acquisition of One Bank, FNB made its first entry into the Little Rock, Pulaski County area. Given the acquisition occurred recently, we did not include performance in this area in the Performance Evaluation (PE).

FNB operates 14 full-service banking centers throughout AR. The main branch and two additional branches are located in Paragould, with other branches located in Jonesboro, Piggott, Corning, Heber

Springs, Rogers, Bentonville, Springdale, and Fayetteville. Bank lobby hours are 8:00 a.m. to 5:00 p.m. Monday through Friday at all locations. Four of the locations are open from 8:00 a.m. to 12:00 p.m. on Saturdays. The bank has not closed any branches and opened four new branches since the last CRA evaluation. These branches are in Fayetteville, Bentonville, and two in Springdale, and all opened in 2015. All branches provide a full range of products and services including drive-up facilities and automated teller machines (ATMs). The bank operates one stand-alone ATM inside the Arkansas Methodist Hospital in Paragould.

FNB entered the Benton and Washington Counties AA in 2014, with no prior penetration of the area. The bank now has five branches in this fast growing AA. Management projects continued deposit and lending opportunity growth in this market. As of June 30, 2018, FNB had \$85 million in deposits with a market share of less than one percent. To increase market share in this competitive market, management developed specialized deposit campaigns including its *You1st* program.

Loan products provided by the bank include home purchase/refinance, home improvement, agricultural, commercial, small business, and consumer loans. Loan officers in northeastern Arkansas originate a mix of agricultural, commercial, small business, consumer, and residential loans. Agricultural lending is less prevalent in the other three markets, where loan officers originate commercial, small business, consumer and residential loans primarily. There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs in its AAs. FNB received an overall rating of "Satisfactory" at the last CRA evaluation dated April 21, 2015.

FNB has three AAs.

- Craighead County AA – This AA consists of all 17 whole census tracts (CTs) within Craighead County. Craighead County makes up the northern part of the Jonesboro, AR Metropolitan Statistical Area (MSA).
- Benton and Washington Counties AA – This AA consists of all 32 whole CTs within Washington County and 18 CTs within Benton County. Benton and Washington Counties make up the southwestern portion of the Fayetteville, Springdale, Rogers, AR-MO MSA.
- Non-MSA AA – This AA consists of all whole CTs within Clay, Cleburne, and Greene Counties. There are a total of 22 CTs in these three counties.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of FNB's CRA activities in its AAs under the Intermediate Small Bank CRA procedures, which includes the Lending Test and the Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments and donations, and services.

Loan information used for this evaluation included a sample of small business loans from 2016, 2017, and 2018, and Home Mortgage Disclosure Act (HMDA) data from 2016, 2017, and 2018. Conclusions regarding the CD Test are based on the bank's CD activities during the same period.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multi-state ratings.

The bank's strategy focuses on growing the commercial loan portfolios. Mortgage loan products are limited to conventional loans. Therefore, performance in small business lending is weighted more heavily in the lending test than performance in home mortgage lending.

The state rating is based on performance in all bank AAs. Refer to the "scope" section under each state and MMSA 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 Arkansas¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank's LTD ratio is more than reasonable, reflecting strong responsiveness to credit needs in the communities.
- A substantial majority of the loans were originated inside the bank's AAs.
- The distribution of loans to individuals and businesses of different income levels is reasonable and meets the standard for satisfactory performance.
- The geographic distribution of loans in low- and moderate-income (LMI) areas is reasonable and meets the standard for satisfactory performance.
- CD activities including lending, investments, services, and donations reflect excellent responsiveness to CD needs within the bank's AAs.

Description of Institution's Operations in Arkansas

The bank operates only in Arkansas. The information provided in the Description of Institution section of this PE describes the institution's operations in Arkansas.

We conducted three community contacts in conjunction with this evaluation. Contacts included the director of an economic development organization in Greene County and representatives from community groups serving the other AA communities. Each of the contacts noted small business lending as a need in the communities. Affordable housing was identified as a need in Craighead, Clay, and Greene Counties. Basic consumer lending was identified as a credit need in Benton and Washington Counties. The contact for Benton and Washington Counties noted that the bank collaborated with community groups to provide consumer credit counseling for individuals who were denied credit.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Benton and Washington Counties AA

Table A - Demographic Information of the Assessment Area						
Assessment Area: Benton Washington Counties AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	2.0	24.0	44.0	30.0	0.0
Population by Geography	303,085	1.3	27.3	38.6	32.9	0.0
Housing Units by Geography	123,263	1.3	27.1	37.9	33.7	0.0
Owner-Occupied Units by Geography	62,286	0.7	19.5	40.4	39.4	0.0
Occupied Rental Units by Geography	50,762	2.1	36.2	34.3	27.4	0.0
Vacant Units by Geography	10,215	1.3	28.4	39.9	30.4	0.0
Businesses by Geography	18,083	1.5	20.8	44.2	33.5	0.0
Farms by Geography	587	1.9	14.5	47.9	35.8	0.0
Family Distribution by Income Level	73,080	20.5	18.4	19.2	41.9	0.0
Household Distribution by Income Level	113,048	24.4	17.2	17.6	40.8	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale-Rogers, AR-MO MSA		\$60,032	Median Housing Value			\$162,395
			Median Gross Rent			\$740
			Families Below Poverty Level			12.2%
<p>Source: 2010 U.S. Census & 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Craighead County AA

Table A - Demographic Information of the Assessment Area

Assessment Area: Craighead County AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	11.8	11.8	58.8	17.6	0.0
Population by Geography	101,409	10.4	12.8	55.7	21.1	0.0
Housing Units by Geography	42,600	10.1	15.1	55.1	19.8	0.0
Owner-Occupied Units by Geography	22,887	3.0	9.9	58.5	28.6	0.0
Occupied Rental Units by Geography	15,837	17.9	22.2	50.6	9.4	0.0
Vacant Units by Geography	3,876	19.8	16.6	53.2	10.4	0.0
Businesses by Geography	5,405	12.0	17.4	51.7	18.9	0.0
Farms by Geography	481	2.3	7.3	62.8	27.7	0.0
Family Distribution by Income Level	25,802	19.9	16.8	19.4	43.9	0.0
Household Distribution by Income Level	38,724	23.4	15.7	17.0	44.0	0.0
Median Family Income MSA - 27860 Jonesboro, AR MSA		\$49,928	Median Housing Value			\$121,112
			Median Gross Rent			\$687
			Families Below Poverty Level			14.6%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0

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

Non-MSA Counties AA

Table A - Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	0.0	4.5	68.2	27.3	0.0
Population by Geography	84,493	0.0	2.7	69.0	28.3	0.0
Housing Units by Geography	42,214	0.0	2.3	71.4	26.4	0.0
Owner-Occupied Units by Geography	23,380	0.0	1.5	68.6	29.9	0.0
Occupied Rental Units by Geography	10,070	0.0	4.7	72.1	23.2	0.0
Vacant Units by Geography	8,764	0.0	1.4	77.9	20.7	0.0
Businesses by Geography	3,945	0.0	2.6	73.9	23.4	0.0
Farms by Geography	405	0.0	0.7	66.4	32.8	0.0
Family Distribution by Income Level	22,729	17.2	16.1	20.5	46.1	0.0
Household Distribution by Income Level	33,450	21.6	14.9	16.2	47.3	0.0
Median Family Income Non-MSAs - AR		\$45,060	Median Housing Value			\$103,399
			Median Gross Rent			\$639
			Families Below Poverty Level			12.3%
<p><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></p>						

Scope of Evaluation in Arkansas

We performed full-scope reviews of each of the bank's three AAs.

- Benton and Washington Counties AA – This AA consists of all 32 whole CTs within Washington County and 18 CTs within Benton County. Benton and Washington Counties make up the southwestern portion of the Fayetteville Springdale Rogers AR-MO MSA.
- Craighead County AA – This AA consists of all 17 whole CTs within Craighead County. Craighead County makes up the northern part of the Jonesboro, AR MSA.
- Non-MSA AA – This AA consists of all whole CTs within Clay, Cleburne, and Greene Counties. There are a total of 22 CTs in these three counties.

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 a full-scope review, 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

The overall geographic distribution of home mortgage loans is excellent.

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

Benton and Washington Counties AA

There are 50 CTs in the Benton and Washington Counties AA. Of these, only one CT is low-income and 12 CTs are moderate-income. Because only one low-income CT is represented in this AA, but the demographic and aggregate data reflects the whole MSA, analysis would not be meaningful and therefore is not included in this PE. Additionally, this analysis weighed the bank's performance in 2017 and 2018, more heavily due to the bank's recent entry into the market resulting in limited activity in 2016.

In 2016, the bank's mortgage lending in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units and somewhat lower than the aggregate lending in low-income geographies. However, in 2017 and 2018, the bank's mortgage lending in moderate-income geographies exceeds the owner-occupied housing and exceeds the aggregate lending in moderate-income geographies.

Craighead County AA

There are 17 CTs in the Craighead County AA. Out of these CTs, two are low-income and two are moderate-income.

For 2016, the bank's mortgage lending in low-income geographies exceeds the owner-occupied housing and exceeds the aggregate lending in low-income. For moderate-income geographies, the bank's mortgage lending exceeds the owner-occupied housing units and exceeds the aggregate lending in moderate-income geographies.

In 2017-2018, the bank's mortgage lending in low-income geographies exceeds the owner-occupied housing units and exceeds the aggregate lending in low-income geographies. For moderate-income geographies, the bank's mortgage lending exceeds the owner-occupied housing and exceeds the aggregate lending in moderate-income geographies.

Non-MSA AA

Three counties make up the Non-MSA AA: Greene, Clay, and Cleburne. There are 22 CTs within the Non-MSA AA. Out of these CTs, there are no low-income CTs and only one moderate-income CT. While the analysis is limited with only one moderate-income CT in the AA, it is notable that the bank's lending exceeded both the owner-occupied housing units in the AA and the aggregate lending level for all three years in the evaluation period.

Small Loans to Businesses

The overall geographic distribution of small business loans is reasonable.

Refer to Table Q in the state of Arkansas section of 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. More weight was given to the Craighead County AA and the non-MSA AA than the Benton and Washington Counties AA due to the bank's recent entry into the Benton and Washington Counties AA. The majority of the bank's deposit and lending activity centered in the Craighead County AA and non-MSA AA during the evaluation period.

Benton and Washington Counties AA

There are 50 CTs in the Benton and Washington Counties AA. Of these, only one CT is low-income and 12 CTs are moderate-income. Because only one low-income CT is represented in this AA, but the demographic and aggregate data reflects the whole MSA, analysis of lending in low-income areas would not be meaningful and therefore is not included in this PE. Additionally, for 2016, the bank did not originate enough loans to perform meaningful analysis. We identified only 11 loans originated in the AA during 2016. While the analysis is limited, the bank's lending in the moderate-income CT exceeded the aggregate lending for moderate-income CTs in the MSA.

In 2017 and 2018, the bank's lending in moderate-income CTs was lower than both the percent of businesses located in moderate-income CTs and the aggregate lending to small businesses located in moderate-income CTs.

Craighead County AA

There are 17 CTs in the Craighead County AA. Out of these CTs, two are low-income and two are moderate-income.

For 2016, the bank did not originate enough loans to perform meaningful analysis. We identified only 15 loans in the AA for 2016. For 2017-2018, the bank's small business lending in low-income geographies was near to the aggregate lending to small businesses in low-income geographies although it was lower than the percent of small businesses in low-income CTs. However, for moderate-income CTs, the bank's lending exceeds both the aggregate lending to small businesses in moderate-income CTs and the percent of businesses within the moderate-income CTs.

Non-MSA AA

Three counties make up the Non-MSA AA: Greene, Clay, and Cleburne. There are 22 CTs within the Non-MSA AA. Out of these CTs, there are no low-income CTs and only one moderate-income CT.

While the analysis is limited with only one moderate-income CT in the AA, it is notable that in all three years of the evaluation period, the bank's lending performance exceeds both the percent of businesses and the aggregate lending level in the moderate-income CT.

Lending Gap Analysis

There are no unexplained, conspicuous gaps in lending.

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 of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

The overall distribution of home loans to borrowers with different income levels is reasonable.

Benton and Washington Counties AA

The bank's performance in lending to low- and moderate-income borrowers in the AA is poor but adequate when considering performance context. The bank's strategic focus is commercial lending; however, the bank offers traditional home mortgages that do not involve subsidized lending, low down payment, or

other flexible terms. The bank's mortgage lending competitors are larger regional or nationwide banks and non-bank mortgage lenders that can offer a broader range of mortgage products. Furthermore, low-income and some moderate-income borrowers have difficulty purchasing homes without subsidized lending considering the median price of a home in the AA is \$162,395. Taxes and insurance also add to the cost of owning a home. The poverty level is high at 12.2 percent for the AA. The median family income for the AA is \$60,032. Low-income is considered less than 50 percent of the median family income, or less than \$30,016, and moderate-income is 50 percent to less than 80 percent of the median family income, or \$30,016 to less than \$48,026.

For this analysis, more weight was given to the performance in 2017 and 2018, because of the bank's recent entry into the market resulting in limited activity in 2016.

For 2016, the bank had no mortgage lending to low-income borrowers although 20.8 percent of the families in the AA were low-income. The aggregate lending to low-income borrowers was 5.5 percent. The bank's lending to moderate-income borrowers is lower than the percent of moderate-income families in the AA and lower than the aggregate lending to moderate-income borrowers.

For 2017-2018, the bank had no lending to low-income borrowers although 20.5 percent of the families in the AA were low-income. The aggregate lending to low-income borrowers was 6.5 percent. The bank's lending to moderate-income borrowers is lower than the amount of moderate-income families and lower than the aggregate lending to moderate-income borrowers.

Craighead County AA

The bank's performance in lending to low- and moderate-income borrowers in the AA is poor but adequate when considering performance context. Many of the same factors affecting the performance in the Benton and Washington Counties AA also contributed to performance in this AA. The bank's strategic focus is commercial lending although it offers conventional mortgage loans in the AA. Low-income and some moderate-income borrowers have difficulty purchasing homes without subsidized lending considering the median price of a home in the AA is \$121,112. Taxes and insurance also add to the cost of owning a home. The poverty level is high at 14.6 percent for the AA. The median family income for the AA is \$49,928 with low-income being less than \$24,964 and moderate-income being \$24,964 to less than \$39,942.

For 2016, the bank's mortgage lending to low-income borrowers is significantly lower than the amount of low-income families and somewhat lower than the aggregate lending to low-income borrowers. The bank's lending to moderate-income borrowers is lower than the amount of moderate-income families and is somewhat lower than the aggregate lending to moderate-income borrowers.

For 2017-2018, the bank's mortgage lending to low-income borrowers exceeds the aggregate lending to low-income borrowers and is somewhat lower than the aggregate lending to moderate-income borrowers although it is significantly lower than the amount of low- and moderate-income families.

Non-MSA AA

For 2016, the bank's mortgage lending to low-income borrowers is somewhat lower than the amount of low-income families, but exceeds the aggregate lending to low-income borrowers. The bank's lending to moderate-income borrowers is lower than the amount of moderate-income families, but is near to the aggregate lending to moderate-income borrowers.

In 2017-2018, the bank's mortgage lending to low-income borrowers is lower than the amount of low-income families, but exceeds the aggregate lending to low-income borrowers. The bank's lending to moderate-income borrowers is near to the amount of moderate-income families and exceeds the aggregate lending to moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Arkansas section of 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 overall distribution of loans to businesses of different sizes is excellent.

Benton and Washington Counties AA

For 2016, all the loans in our sample were made to businesses with revenues less than or equal to \$1 million (small businesses). This exceeds both the percent of businesses identified as having revenues less than or equal to \$1 million and the aggregate lending to small businesses.

For 2017-2018, the bank's lending to small businesses is lower than the percent of businesses identified as having revenues less than or equal to \$1 million, but exceeds the aggregate lending to small businesses.

Craighead County AA

For 2016, all the loans in our sample were to small businesses. This exceeds both the percent of businesses identified as having revenues less than or equal to \$1 million and the aggregate lending to small business.

For 2017-2018, the bank's lending to small businesses exceeds both the percent of businesses identified as having revenues less than or equal to \$1 million and the aggregate lending to small business.

Non-MSA AA

For 2016, the bank's lending to small businesses exceeds the percent of businesses identified as having revenues less than \$1 million and exceeds the aggregate lending to small businesses.

For 2017-2018, the bank's lending to small businesses exceeds the percent of businesses identified as having gross annual revenues less than or equal to \$1 million and exceeds the aggregate lending to small businesses.

Responses to Complaints

The bank received one complaint during the assessment period. The bank responded to the complaint timely with accurate information.

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 community development needs through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development 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.

During the CD Test evaluation period, FNB originated 27 CD loans totaling \$34.9 million.

Benton and Washington Counties AA

The level of qualified CD loans in the Benton and Washington Counties AA represents excellent responsiveness to the needs of the community. The bank originated four CD loans totaling \$6 million during the evaluation period. Key lending in the AA included loans to finance community services and revitalization and stabilization projects and loans to promote economic development.

Significant loans included a \$1.3 million purchased participation in a larger loan to revitalize the North Walton Boulevard area of Bentonville. The bank also originated a \$4 million loan to construct 58 units of affordable housing.

Craighead County AA

The level of qualified CD loans in the Craighead County AA reflects excellent responsiveness to the needs of the community. The bank originated or renewed 13 CD loans totaling \$20.9 million during the evaluation period. Key lending in the AA included loans to finance community services, revitalization and stabilization projects, and loans to promote economic development.

Significant loans included two loans to finance operations of an organization providing childcare and educational services for children in LMI families within the AA. The bank also provided two loans totaling \$13.8 million to a regional hospital in the AA providing healthcare services to LMI individuals in the AA.

Non-MSA AA

The level of qualified CD loans in the Green Clay Cleburne Counties AA represents excellent responsiveness to the needs of the community. The bank originated ten CD loans totaling \$8 million during the evaluation period. Key lending in the AA included loans to finance community services, revitalization and stabilization projects, and loans to promote economic development.

Significant loans included two loans to municipal entities for essential infrastructure in LMI areas. The bank also originated a \$1.4 million loan to finance an anchor merchant providing stability in a retail area of a LMI area.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Benton and Washington Counties AA	0	0	12	2,480	12	6.45	2,480	5.51	0	0
Craighead County AA	0	0	10	2,650	10	5.38	2,650	5.88	0	0
Non-MSA AA	0	0	33	9,625	33	17.74	9,625	21.37	0	0
Statewide with no Purpose, Mandate, or Function	0	0	131	30,275	131	70.43	30,275	67.23	0	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.

Benton and Washington Counties AA

The level of qualified investments in the Benton and Washington Counties AA indicates excellent responsiveness to the needs of the AA, and the level of donations indicates excellent responsiveness to the needs of the community. FNB purchased school bonds from low-income school districts in the AA communities during the evaluation period. The Bank also purchased municipal bonds from distressed areas for improvement to critical infrastructure including electric and water service during the evaluation period.

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

Craighead County AA

The level of qualified investments in the Craighead County AA indicates excellent responsiveness to the needs of the AA, and the level of donations indicates excellent responsiveness to the needs of the community. FNB purchased school bonds from low-income school districts in the AA communities during the evaluation period. The bank also purchased municipal bonds from distressed areas for improvement to critical infrastructure during the evaluation period. The bank has significant market share in the AA. When opportunities to invest directly in the AA communities were not available, FNB invested funds in projects with broader regional or statewide impact such as water conservation and education.

Non-MSA AA

The level of qualified investments in the non-MSA AA indicates excellent responsiveness to the needs of the AA, and the level of donations indicates excellent responsiveness to the needs of the community. FNB purchased school bonds from low-income school districts in the AA communities during the evaluation period. The bank also purchased municipal bonds to fund improvements to critical infrastructure including water and sewer projects during the evaluation period.

Statewide with no Purpose, Mandate, or Function

Qualified investments that are located in the broader statewide or regional area that do not have a purpose, mandate, or function to serve the AAs may receive consideration if the bank has been responsive to the needs and opportunities of its AAs. Because the level of qualified investments in the bank's AAs is excellent, the investments with broader statewide impact receive consideration. The bank purchased school bonds from low-income school districts statewide during the evaluation period. The bank also purchased municipal bonds to fund improvements to critical infrastructure including water and sewer projects during the evaluation period.

Extent to Which the Bank Provides Community Development Services

Benton and Washington Counties AA

The level of qualified CD services provided by bank employees and officers within the Benton and Washington Counties AA indicates excellent responsiveness to the needs of the community. Bank employees and officers provide technical assistance and financial services to numerous community groups serving LMI individuals in the AA communities.

Junior Achievement of Arkansas – Bank employees volunteer to provide financial literacy programs to high school students through Junior Achievement of Arkansas.

Mission Outreach and LifeSource – Bank employees and officers volunteer to provide financial literacy programs to adults in the AA communities through Mission Outreach and LifeSource. Both organizations are non-profits committed to improving the lives of LMI individuals in the AA communities.

Craighead County AA

The level of qualified CD services provided by bank employees and officers within the Craighead County AA indicates excellent responsiveness to the needs of the community. Bank employees and officers provide technical assistance and financial services to numerous community groups serving LMI individuals in the AA communities.

Arkansas Dream Center – A bank officer serves on the board, and several employees volunteer with the Arkansas Dream Center, a non-profit organization serving LMI individuals and families in the AA communities. The Arkansas Dream Center focuses on LMI children and families. The organization provides summer youth activities and birthday cakes to children in need within the communities it serves. The center fed more than 150 thousand children in 2018.

Abilities Unlimited – A bank officer serves as the president of the board of Abilities Unlimited, a non-profit organization with the goal of improving the living and working conditions and opportunities of people with severe disabilities.

Non-MSA AA

The level of qualified CD services provided by bank employees and officers within the non-MSA AA indicates excellent responsiveness to the needs of the community. Bank employees and officers provide technical assistance and financial services to numerous community groups serving LMI individuals in the AA communities.

Credit Counseling of Arkansas (CCOA) – A bank officer serves on the board of CCOA, a non-profit organization focused on increasing financial literacy and helping individuals and families become more creditworthy. The organization provides credit counseling, credit report reviews, and other financial literacy programs for LMI individuals. FNB also collaborates with CCOA to provide credit counseling at no charge for individuals who apply for and are denied credit with the bank.

Greene County Tech Educational Foundation - Bank officers and employees volunteer their time, and FNB provides resources for the foundation. This organization runs a pseudo bank in the Greene County Tech high school. Students learn about banking through operating and interacting with the pseudo bank. FNB employees volunteer to train and oversee the program, which includes a teller window, checking accounts, a vault, and other basic services for students of Greene County Tech high school. In 2016, 50 percent of the students enrolled in Greene County Tech received free or reduced price lunches. In 2017 and 2018, 51 percent and 48 percent of the students, respectively, received free or reduced price lunches.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home Mortgage Loans Small Business Loans Community Development Loans, Investments and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Arkansas		
Benton and Washington County AA	Full Scope	This AA consists of all 32 whole CTs within Washington County and 18 CTs within Benton County. The AA includes a total of 50 CTs. Benton and Washington Counties make up the southwestern portion of the Fayetteville, Springdale, Rogers AR-MO MSA.
Craighead County AA	Full Scope	This AA consists of all 17 whole CTs within Craighead County. Craighead County makes up the northern part of the Jonesboro, AR MSA.
Non-MSA AA	Full Scope	This AA consists of all whole CTs within Clay, Cleburne, and Greene Counties. There are a total of 22 CTs in these three counties

Appendix B: Summary of MMSA and State Ratings

RATINGS Arkansas			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank	Satisfactory	Outstanding	Satisfactory
MMSA or 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 secured either 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 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. 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Benton Washington Counties AA	51	10,549	9.9	12,532	2.8	3.9	2.0	9.4	5.9	8.1	56.1	27.5	49.5	31.7	62.7	40.4	0.0	0.0	0.0
Craighead AA	107	19,510	20.8	3,738	1.0	1.9	0.6	16.7	17.8	17.0	45.3	37.4	36.4	37.0	43.0	45.9	0.0	0.0	0.0
Non-MSA AA	356	31,461	69.3	2,499	0.0	0.0	0.0	1.5	2.2	1.2	83.8	79.8	81.8	14.7	18.0	17.0	0.0	0.0	0.0
Total	514	61,520	100.0	18,769	1.8	0.8	1.5	9.1	5.8	9.0	60.2	65.8	51.2	28.9	27.6	38.4	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 **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Benton and Washington Counties AA	85	65,098	8.0	11,622	0.7	1.2	0.4	19.5	30.6	15.7	40.4	32.9	34.9	39.4	35.3	48.9	0.0	0.0	0.0
Craighead County AA	347	53,504	32.9	3,795	3.0	7.8	4.1	9.9	11.0	7.7	58.5	57.1	53.5	28.6	24.2	34.6	0.0	0.0	0.0
Non-MSA AA	624	66,527	59.1	2,469	0.0	0.0	0.0	1.5	2.1	1.1	68.6	63.9	61.4	29.9	34.0	37.5	0.0	0.0	0.0
Total	1,056	185,129	100.0	17,886	1.0	2.7	1.2	13.6	7.3	12.0	50.3	59.2	42.5	35.1	30.9	44.3	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Benton and Washington Counties AA	51	10,549	9.9	12,532	20.8	0.0	5.5	17.8	5.9	13.5	20.4	3.9	16.7	41.0	35.3	45.4	0.0	54.9	18.9
Craighead County AA	107	19,510	20.8	3,738	22.8	1.9	3.1	15.7	6.5	10.7	18.2	12.2	18.4	43.3	46.7	45.4	0.0	32.7	22.4
Non-MSA AA	356	31,461	69.3	2,499	17.6	7.3	4.4	17.8	10.4	11.2	22.6	20.8	18.8	41.9	50.8	46.9	0.0	10.7	18.8
Total	514	61,520	100.0	18,769	20.6	5.4	4.9	17.4	9.1	12.7	20.4	17.3	17.3	41.7	48.4	45.6	0.0	19.7	19.6

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Benton and Washington Counties AA	85	65,098	15.9	11,622	20.5	0.0	6.5	18.4	3.5	14.2	19.2	3.5	18.0	41.9	32.9	43.2	0.0	60.0	18.2
Craighead AA	347	53,504	32.9	3,795	19.9	3.7	2.8	16.8	7.8	10.5	19.4	11.0	18.3	43.9	47.0	44.4	0.0	30.5	23.9
Non-MSA AA	624	66,527	59.1	2,469	17.2	6.7	4.2	16.1	14.9	12.4	20.5	14.7	18.3	46.1	50.5	43.5	0.0	13.1	21.5
Total	1,056	185,129	100.0	17,886	19.8	5.2	5.4	17.6	11.6	13.2	19.5	12.6	18.1	43.1	47.9	43.5	0.0	22.6	19.9

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Benton and Washington Counties AA	11	303,160	31.5	6,322	5.1	0	4.7	20	18.2	17.4	45.5	18.2	44.1	29.4	63.6	33.7	0	0	0
Craighead County AA	15	367,415	49.6	2,602	2.9	0	1.5	36.1	13.3	26.5	25.5	60	34.2	35.5	26.7	37.9	0	0	0
Non-MSA AA	20	293,050	39.6	1,244	0	0	0	2.5	15.0	3.4	88	65.0	85.3	9.4	20.0	11.3	0	0	0
Total	46	963,626	100.0	10,168	3.9	0	3.3	20.6	15.5	18	48	47.7	46.6	27.5	36.8	32	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 **2017-18**

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	% Businesses	% Bank Loans in AA	Aggregate	% Businesses	% Bank Loans in AA	Aggregate	% Businesses	% Bank Loans in AA	Aggregate	% Businesses	% Bank Loans in AA	Aggregate	% Businesses	% Bank Loans in AA	Aggregate
Benton and Washington Counties AA	23	788,519	39.9	6,219	1.6	0	1.3	21	8.7	18.1	44.4	26.1	42.9	33.1	65.22	37.8	0	0	0
Craighead County AA	28	489,237	49.1	2,441	12.1	7.1	7.9	17.4	25.0	13.9	51.7	35.7	56.0	18.9	32.1	22.1	0.0	0.0	0.0
Non-MSA AA	24	698,466	42.1	1,149	0.0	0.0	0.0	2.7	8.33	3.4	73.8	79.1	66.4	23.6	12.6	30.2	0.0	0.0	0.0
Total	123	1,976,222	100.0	9,809	3.4	2.0	2.8	17.6	11.4	15.3	50.1	51.6	48.9	28.8	43.34	33	0	0	0

Source: 2018 D&B Data; 01/01/2017 - 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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans in AA	Aggregate	% Businesses	% Bank Loans in AA	% Businesses	% Bank Loans in AA
Benton and Washington Counties AA	11	79,643	11%	6,322	78.9	100.00	51.3	6.1	0	15	0
Craighead AA	15	367,415	50%	2,602	78.8	100.00	48.3	7	0	14.1	0
Non-MSA AA	20	293,050	40%	1,244	81.6	89.5	44.3	4.7	5.3	13.6	5.3
Total	46	740,109	100%	10,168	79.3	96.5	49.7	6.1	1.8	14.6	1.8

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 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Benton and Washington Counties AA	23	788,519	25.2	6,219	78.8	52.2	50.3	6.1	47.8	15.1	0
Craighead County AA	51	1,111,179	35.6	2,441	78.2	92.2	47.8	7.3	5.9	14.5	2.0
Non-MSA AA	49	1,224,852	39.2	1,149	80.4	85.7	46	5	4.1	14.6	10.2
Total	123	3,124,550	100.0	9,809	78.9	76.7	49.2	6.2	19.3	14.9	2.3

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