Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

June 23, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Eastern Arkansas
Charter Number: 13637

101 North Washington Street
Forrest City, AR 72335

Office of the Comptroller of the Currency

Victory Building
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: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on First National Bank of Eastern Arkansas's (FNBEA or bank) satisfactory lending performances within the Memphis Multistate Metropolitan Statistical Area (MMSA) and the state of Arkansas. During the evaluation period, the bank's loan-to-deposit (LTD) ratio was reasonable, and a majority of loans originated were within the assessment areas (AAs).

- The Community Development (CD) Test rating is based on the bank's performance in each AA. The bank adequately responds to the CD needs in the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment areas (AAs), the bank's loan-to-deposit ratio was reasonable.

Over the last 12 quarters, the average LTD was 64 percent. The highest was 72.52 percent in the third quarter of 2025 and the lowest was 53.64 percent in the first quarter of 2023.

The bank's LTD ratio compares favorably with other financial institutions of similar size, location, and product offerings. First National Bank of Eastern Arkansas (FNBEA) ranks third among 10 similarly situated banks. The average LTD ratios for the other banks over the same 12 quarters range from 51.48 percent to 104.95 percent. Competition from other financial institutions is above average. The bank's competitors include several local community banks and branches of large regional and nationwide institutions.

Lending in Assessment Area

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

The bank originated and purchased 93.26 percent 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.

Table 1: Lending Inside and Outside of the Assessment Area										2023 - 2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	262	93.24	19	6.76	281	24,365	77.97	6,883	22.03	31,248
Small Business	56	93.33	4	6.67	60	3,022	98.02	61	1.98	3,083
Total	**318**	**93.26**	**23**	**6.74**	**341**	**27,387**	**79.77**	**6,944**	**20.23**	**34,331**
Source: 1/1/2023 - 12/31/2025 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

FNBEA is a $595.9 million, multi-state financial institution headquartered in Forrest City, Arkansas. FNBEA is a subsidiary of a single entity holding company, Bancshares of Eastern Arkansas, Incorporated located in Forrest City, Arkansas. FNBEA was chartered in 1886.

FNBEA has two AAs – the Memphis Multistate Metropolitan Statistical Area (MMSA) AA and the Arkansas Non-MSA AA. The Memphis MMSA includes select counties from the Memphis TN-MS-AR MMSA (Shelby, Desoto, and Crittenden Counties). The Arkansas Non-MSA AA in Arkansas consists of seven counties: St. Francis County, Mississippi County, Cross County, Woodruff County, Monroe County, Lee County, and Phillips County.

The bank operates 15 full-service banking centers in Arkansas and Tennessee. The main branch is in Forrest City, AR, with other branches located throughout the northeastern part of the state of Arkansas. The bank has two branches in Tennessee. The most recent branch addition is in Collierville, Tennessee, which opened in 2020 as a loan production office. This branch was converted to a full-service branch and moved to a new location in June 2023 All branch locations offer drive-in banking and lobby hours on Monday through Friday. There are two stand-alone automated teller machines (ATMs) in Forrest City (Forrest City Machine Works) and Wynne (Exxon Circle N).

Management's primary lending activities are real estate and commercial loans. As of December 31, 2025, net loans totaled $357.6 million and represented 60.0 percent of total assets. Real estate secured loans totaled $242.0 million and represented 67.7 percent of total loans. The remainder of the loan portfolio consists of $61.1 million (17.1 percent of total loans) in commercial loans, $40.1 million (11.2 percent) in agricultural loans, and $12.5 million (3.5 percent) in loans to individuals.

No mergers or acquisitions occurred within the evaluation period. No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AA during the evaluation period. The bank received an overall rating of "Satisfactory" at the last Community Reinvestment Act (CRA) evaluation dated April 10, 2023.

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 January 1, 2023, through December 31, 2025. Examiners sampled

business loans in both AAs. Home Mortgage Disclosure Act (HMDA) data gathered during the evaluation period was also evaluated during the period and reported within this Public Evaluation.

Selection of Areas for Full-Scope Review

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

Ratings

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

The call report was used to determine the top two loan categories. Primary lending includes real estate and commercial lending.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those 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) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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.

Multistate Metropolitan Statistical Area Rating

Memphis MMSA

CRA rating for the Memphis MMSA[1]: Satisfactory

The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- The bank exhibits adequate responsiveness to the CD needs in its AA.

Description of Institution's Operations in Memphis MMSA

FNBEA operates four full-service branches within the Memphis MMSA. There are two branches in Arkansas, one is in Marion, and one is in Earle. There are two branches in Shelby County, one in Memphis and one in Collierville, Tennessee. The two branches in Tennessee are located in upper income census tracts (CTs) and surrounded by other upper and middle-income CTs. The primary business focus in the MMSA is home mortgages, business loans, and agricultural loans. Given the bank's branch network and business strategy, the AA excludes the remaining counties in the Memphis MMSA; these include Fayette, Tunica, Marshall, Tipton, and Tate Counties.

Given their limited presence and overall size of the Memphis market within the Memphis MMSA, FNBEA's market share is negligible. As of December 31, 2025, FNBEA's total deposits in the Memphis MMSA were $76.74 million or 0.2 percent of the total market. This ranks 36th out of 40 possible financial institutions in the MMSA. Major competitors in the MMSA include: First Horizon Bank, Regions Bank, and Pinnacle Bank.

The Memphis MMSA consists of three counties located in Arkansas, Mississippi, and Tennessee. As of the 2024 Census and 2025 Dun & Bradstreet SBSF Demographics, the Memphis MMSA consists of 310 CTs: 93 upper-income CTs, 64 middle-income CTs, 85 moderate-income CTs, 56 low-income CTs, and 12 CTs with no income information available. This MMSA is appropriate given the bank's branch locations and does not arbitrarily exclude any low- or moderate-income CTs.

To help identify the financial needs in the MMSA, the OCC held discussions with a couple of organizations within the area. Some of the main opportunities identified are financial education, small dollar loans for LMI consumers to build credit, microloans for new entrepreneurs, financing for affordable housing development and housing rehab projects, and first-time home buyer down payment assistance.

[1] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area(s) - Memphis MMSA						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	310	18.06	27.42	20.65	30.00	3.87
Population by Geography	1,163,221	13.21	26.11	22.67	36.88	1.13
Housing Units by Geography	496,227	15.51	27.23	22.77	33.58	0.91
Owner-Occupied Housing by Geography	254,234	7.54	22.11	22.86	47.19	0.30
Occupied Rental Units by Geography	185,818	21.89	32.43	23.85	20.16	1.68
Vacant Units by Geography	56,175	30.52	33.19	18.79	16.34	1.15
Businesses by Geography	40,097	9.28	24.27	21.10	43.17	2.18
Farms by Geography	1,198	7.43	22.79	19.78	49.17	0.83
Family Distribution by Income Level	278,931	23.51	15.89	17.79	42.82	0.00
Household Distribution by Income Level	440,052	25.35	15.35	16.62	42.68	0.00
Unemployment rate (%)	6.96	14.11	9.46	6.40	3.61	7.85
Households Below Poverty Level (%)	16.45	37.52	21.87	12.61	6.22	45.74
Median Family Income (32820 - Memphis, TN-MS-AR MSA)		$67,639			Median Housing Value	$110,150
Median Family Income (32820 - Memphis, TN-MS-AR MSA) for 2025		$90,500			Median Gross Rent	$947
					Families Below Poverty Level	13.23

FFIEC File - 2020 Census

FFIEC File - 2024 Census

2025 Dun & Bradstreet SBSF Demographics

Due to rounding, totals may not equal 100.0%

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

Scope of Evaluation in Memphis MMSA

The Memphis MMSA received a full-scope review. No limited-scope reviews were conducted. Refer to the table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MEMPHIS MMSA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Memphis MMSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the MMSA.

Home Mortgage Loans

Refer to Table 7 in the MMSA 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.

The geographic distribution of home mortgages by income level is excellent. The percentage of home mortgages in low-income CTs exceeds the percentage of owner-occupied housing units in the AA and the aggregate lending in the AA. The percentage of home mortgages in moderate-income CTs exceeds the percentage of owner-occupied housing units in the AA and the aggregate lending in the AA.

Small Loans to Businesses

Refer to Table 9 in the MMSA 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.

The geographic distribution of small loans to businesses by income geography in the Memphis MMSA is reasonable. The number of bank loans to small businesses located in the low-income CTs is below the percentage of businesses and aggregate lending in the AA. The loans to small businesses located in the moderate-income CTs exceed the percentage of businesses and aggregate lending in the AA.

Lending Gap Analysis

Examiners evaluated the lending distribution in the bank's AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 8 in the MMSA 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 distribution of home mortgages by income level of the borrower is poor. The percentage of home mortgages made to low-income borrowers is lower than the percentage of low-income families in the AA but exceeds the aggregate lending in the AA. The percentage of home mortgages made to moderate-income borrowers is lower than the percentage of moderate-income families in the AA and aggregate lending area.

Small Loans to Businesses

Refer to Table 10 in the MMSA 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 distribution of small loans to businesses by income level of the borrower is excellent. The volume of loans to businesses with revenues less than $1 million exceeds the percentage of businesses with revenues less than $1 million and the aggregate lending in the AA. The volume of loans to businesses with revenues not available is below the percentage of businesses with revenues not available.

Responses to Complaints

There were no complaints related to the institution's CRA performance within the AA during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the Memphis MMSA is rated Satisfactory.

Based on a full-scope review, the bank exhibited adequate responsiveness to community development needs in the MMSA through community development (CD) 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 AA(s).

Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans

Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Memphis MMSA	0	0.00	0	0.00

There were no CD loans originated in the Memphis MMSA during the evaluation period. This performance is evaluated considering the bank's limited market presence (0.2 percent deposit market share) and the competitive banking environment in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Memphis MMSA	4	1,120	4	226	8	100.00	1,346	100.00	-	-

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. This table includes all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

The bank's level of qualified investments and donations demonstrates adequate responsiveness to the CD needs of its AA. The qualified investments for the current period in the Memphis MMSA include three donations and an Arkansas school bond with 50 percent or more students qualifying for free and reduced lunch.

The following are examples of qualified investments in the MMSA:

- Donation to Earle Alumni Cardinal Club, a non-profit community service organization, that goes towards supporting student academic and athletic programs in a moderate-income tract in which 50 percent or more students qualify for free and reduced lunch.
- School municipal bond issued to finance capital improvements for schools with 50 percent or more students qualifying for free and reduced lunch.

Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of CD services within its AA. Bank employees provide financial expertise and knowledge to various local non-profits focused on CD activities. For example, a bank employee is a member of a local rotary club and assists with planning and budgeting for various projects throughout the year.

State Rating

State of Arkansas

CRA rating for the State of Arkansas[2]: Satisfactory
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.
- The bank exhibits adequate responsiveness to the CD needs in its AA.

Description of Institution's Operations in Arkansas

FNBEA operates 11 full-service branches in the Arkansas Non-MSA AA. There are seven branches in St. Francis County and one branch in Mississippi, Cross, Monroe, and Lee Counties. Management did not open any new branches in the non-MSA AA during the evaluation period. There are also two stand-alone ATMs in the AA, one is in St. Francis County, and the other is in Cross County. The primary business focus within the non-MSA AA is home mortgages, business loans, and agriculture loans.

FNBEA has a larger market share in the non-MSA AA than in the Memphis MMSA. As of May 2026, total deposits in the Arkansas non-MSA AA totaled $425.58 million, or 14.56 percent of the total market share. The bank ranks second out of 16 possible financial institutions. Major competitors in the AA include Cross Bank, Farmers Bank and Trust Company, and Southern Bancorp Bank.

The Arkansas non-MSA AA consists of seven counties in the northeastern region of the state. As of the 2024 Census and 2025 Dun & Bradstreet SBSF Demographics, the AA consists of 43 CTs: 12 upper-income CTs, 16 middle-income CTs, 14 moderate-income CTs, and one low-income CT. Given that there is only one low-income CT in the non-MSA AA, the opportunity to lend in those low-income areas is limited.

To help identify the financial needs in the non-MSA AA, the OCC held discussions with a few organizations within the area. Some of the main opportunities identified are small dollar loans and credit repair for low-and moderate-income (LMI) individuals, microloans for small businesses, affordable multifamily rental housing, grants to local food banks, and grants to organizations that provide utility and healthcare assistance to LMI individuals.

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

Arkansas Non-MSA AA

Assessment Area(s) – Arkansas Non-MSA 2025						
2023 - 2025						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	43	2.33	32.56	37.21	27.91	0.00
Population by Geography	118,844	2.06	34.89	34.69	28.36	0.00
Housing Units by Geography	62,454	2.49	32.85	35.76	28.89	0.00
Owner-Occupied Housing by Geography	28,423	1.81	24.73	38.67	34.79	0.00
Occupied Rental Units by Geography	21,080	3.07	42.23	31.51	23.19	0.00
Vacant Units by Geography	12,951	3.06	35.40	36.31	25.23	0.00
Businesses by Geography	2,752	2.25	42.26	31.18	24.31	0.00
Farms by Geography	501	0.20	19.76	46.91	33.13	0.00
Family Distribution by Income Level	32,045	27.31	16.07	17.88	38.74	0.00
Household Distribution by Income Level	49,503	29.83	15.17	15.85	39.15	0.00
Unemployment rate (%)	8.83	17.93	14.07	7.01	5.34	0.00
Households Below Poverty Level (%)	24.45	53.06	33.37	20.87	16.87	0.00
Median Family Income (Non-MSAs - AR)		$53,596			**Median Housing Value**	$73,700
Median Family Income (Non-MSAs - AR) for 2025		$67,100			**Median Gross Rent**	$599
					Families Below Poverty Level	20.05

FFIEC File - 2020 Census

FFIEC File - 2024 Census

2025 Dun & Bradstreet SBSF Demographics

Due to rounding, totals may not equal 100.0%

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

Scope of Evaluation in Arkansas

The Arkansas non-MSA received a full-scope review. No limited-scope reviews were conducted. 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.

Conclusions for Area Receiving a Full-Scope Review

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 exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 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.

The geographic distribution of home mortgages by income level is reasonable. The percentage of home mortgages in low-income CTs is below the percentage of owner-occupied housing units and the aggregate lending in the AA; however, there is only one low-income CT in the AA. The percentage of home mortgages in moderate-income CTs exceeds the percentage of owner-occupied housing units and the aggregate lending in the AA.

Small Loans to Businesses

Refer to Table 9 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.

The geographic distribution of small loans to businesses by income geography is reasonable. The number of small bank loans to businesses located in the low-income CTs is below the percentage of businesses and aggregate lending in the AA. The loans to small businesses located in the moderate-income CTs are below the percentage of businesses and aggregate lending in the AA. The number of small loans to businesses located in middle-income CTs exceeds the percentage of businesses and aggregate lending in the AA and all the loans in the middle-income CTs originated in distressed or underserved areas.

Lending Gap Analysis

Examiners evaluated the lending distribution in the bank's AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 8 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 distribution of home mortgages by income level of the borrower is poor. The percentage of home mortgages made to low-income borrowers is lower than the percentage of low-income families and aggregate lending in the AA. The percentage of home mortgages made to moderate-income borrowers is lower than the percentage of moderate-income families and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table 10 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 distribution of small loans to businesses by income level of the borrower is excellent. The volume of loans to businesses with revenues less than $1 million is near to the percentage of businesses with revenues less than $1 million and exceeds aggregate lending in the AA. The volume of loans to businesses with revenues not available is below the percentage of businesses with revenues not available.

Responses to Complaints

There were no complaints related to the institution's CRA performance within the AA during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited adequate responsiveness to community development needs in the state 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 AA(s).

Number and Amount of Community Development Loans

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

Table 3: Community Development Loans

Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Arkansas Non-MSA	4	100.00	1,037	100.00

The bank's level of CD lending demonstrates adequate responsiveness to the CD needs within the AA. During the evaluation period, the bank originated or renewed four CD loans in the AA totaling approximately $1.04 million.

The following are examples of CD loans the bank originated or purchased in this AA:

- Three loans to anchor businesses in moderate-income CTs.
- One loan to a local government to revitalize/stabilize a distressed middle-income tract.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Arkansas Non-MSA	13	3,870	64	584	77	40.10	4,454	11.22	-	-
Broader Statewide or Regional Area	110	34,114	5	1,115	115	59.90	35,229	88.78	-	-
Total	123	37,984	69	1,699	192	100.00	39.683	100.00	-	-

The bank's level of qualified investments and donations demonstrates adequate responsiveness to the CD needs of its AA. The qualified investments are concentrated in school municipal bonds in the AA and broader statewide area. The qualified investments for the current period in the Arkansas non-MSA include two school bonds and 62 donations.

The following are examples of qualified investments in the AA:

- The bank made a total of 62 donations totaling $24,164 to qualified organizations that promote economic development and community services.
- The bank purchased a school municipal bond issued to finance capital improvements for schools with 50 percent or more students qualifying for free and reduced lunch.

Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of CD services within its AA. Bank employees provide financial expertise and knowledge to various local non-profits focused on CD activities. For example, a bank employee taught a financial literacy class to students in LMI geographies.

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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:	January 1, 2023, to December 31, 2025	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, and community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
No Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSA(s)		
Memphis MMSA	Full Scope	The MMSA consists of all CTs in Crittenden, Shelby, and Desoto Counties.
Arkansas		
Arkansas non-MSA	Full Scope	The non-MSA AA includes St. Francis, Lee, Cross, Monroe, Phiilips, Mississippi, and Woodruff Counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
First National Bank of Eastern Arkansas	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Memphis MMSA AA	Satisfactory	Satisfactory	Satisfactory
Arkansas non-MSA AA	Satisfactory	Satisfactory	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 the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of $1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a 'male householder' and no wife present) or 'female householder' (a family with a 'female householder' and no husband present).

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

Geography: A 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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate 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/AA. 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 7. **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 8. **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/AA. The table also presents aggregate peer data for the years the data is available.

Table 9. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's AA.

Table 10. **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.

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

MEMPHIS MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography — **2023 - 2025**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Memphis MSA	94	15,315	100.00	47,929	7.54	11.70	6.15	22.11	31.91	18.73	22.86	18.09	24.69	47.19	38.30	50.15	0.30	--	0.24
Total	**94**	**15,315**	**100.00**	**47,929**	**7.54**	**11.70**	**6.15**	**22.11**	**31.91**	**18.73**	**22.86**	**18.09**	**24.69**	**47.19**	**38.30**	**50.15**	**0.30**	**--**	**0.24**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower — **2023 - 2025**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Memphis MSA	94	15,315	100.00	47,929	23.51	5.32	4.86	15.89	2.13	14.11	17.79	8.51	18.61	42.82	34.04	38.25	--	50.00	24.18
Total	**94**	**15,315**	**100.00**	**47,929**	**23.51**	**5.32**	**4.86**	**15.89**	**2.13**	**14.11**	**17.79**	**8.51**	**18.61**	**42.82**	**34.04**	**38.25**	**--**	**50.00**	**24.18**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography — **2023 - 2025**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Memphis MSA	20	2,099	100.00	44,601	9.28	5.00	7.88	24.27	25.00	19.65	21.10	20.00	19.88	43.17	50.00	50.54	2.18	0	2.05
Total	**20**	**2,099**	**100.00**	**44,601**	**9.28**	5.00	**7.88**	**24.27**	**25.00**	**19.65**	**21.10**	**20.00**	**19.88**	**43.17**	**50.00**	**50.54**	**2.18**	**0**	**2.05**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2025
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Memphis MSA	20	2,099	100.00	44,601	84.03	85.00	47.82	4.40	10.00	11.57	5.00
Total	**20**	**2,099**	**100.00**	**44,601**	**84.03**	**85.00**	**47.82**	**4.40**	**10.00**	**11.57**	**5.00**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

ARKANSAS NON-MSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2025
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
Arkansas Non-MSA 2025	168	9,049	100.00	2,568	1.81	0.60	0.90	24.73	35.12	22.90	38.67	35.12	32.24	34.79	29.17	43.85	--	--	--
Total	**168**	**9,049**	**100.00**	**2,568**	**1.81**	**0.60**	**0.90**	**24.73**	**35.12**	**22.90**	**38.67**	**35.12**	**32.24**	**34.79**	**29.17**	**43.85**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2023 - 2025
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Arkansas Non-MSA 2025	168	9,049	100.00	2,568	27.31	3.57	4.87	16.07	10.71	12.15	17.88	16.07	18.61	38.74	52.98	35.98	--	16.67	28.39
Total	**168**	**9,049**	**100.00**	**2,568**	**27.31**	**3.57**	**4.87**	**16.07**	**10.71**	**12.15**	**17.88**	**16.07**	**18.61**	**38.74**	**52.98**	**35.98**	**--**	**16.67**	**28.39**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2023 - 2025**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Arkansas Non-MSA 2025	20	445	100.00	2,995	2.25	0.00	2.34	42.26	15.00	35.33	31.18	50.00	35.59	24.31	35.00	26.74	--	--	--
Total	**20**	**445**	**100.00**	**2,995**	**2.25**	**0.00**	**2.34**	**42.26**	**15.00**	**35.33**	**31.18**	**50.00**	**35.59**	**24.31**	**35.00**	**26.74**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2023 - 2025**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Arkansas Non-MSA 2025	20	445	100.00	2,995	75.98	75.00	52.42	4.25	10.00	19.77	15.00
Total	20	445	**100.00**	**2,995**	**75.98**	75.00	**52.42**	**4.25**	10.00	**19.77**	15.00

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%