

Community Reinvestment Act (CRA) Public File

Introduction

Fidelity Bank is committed to serving the needs of our communities in compliance with the **Community Reinvestment Act (CRA)**. The CRA encourages financial institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods.

As part of our commitment, we maintain a **CRA Public File** that includes information about our efforts to meet these obligations. This file is available for public inspection and includes key data, policies, and reports that demonstrate our performance.

Contents of the CRA Public File

The CRA Public File includes:

1. **CRA Performance Evaluation** – The most recent CRA Performance Evaluation issued by the regulatory agency.
2. **Branch and ATM Locations** – A list of our branches, including those opened or closed in the past two years, and ATM locations.
3. **Retail Banking Services** – Information about the products and services we offer, including those designed for low- and moderate-income individuals.
4. **Assessment Areas** – Maps and descriptions of the geographic areas we serve.
5. **Loan-to-Deposit Ratio** – Our bank's loan-to-deposit ratio for the past two years.
6. **HMDA Disclosure Statement (if applicable)** – The most recent Home Mortgage Disclosure Act (HMDA) data.
7. **Public Comments** – Any written CRA-related public comments received in the past two years and our responses.

COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Comptroller; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from the Federal Reserve Bank of St. Louis, PO BOX 442, St. Louis, MO 63166-0442.

You may send written comments about our performance in helping to meet community credit needs to:

Crista Swanner, Compliance Officer
Fidelity Bank
330 W. Broadway
West Memphis, AR 72301

and to the Federal Reserve Bank of St. Louis, PO BOX 442, St. Louis, MO 63166-0442. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of Carlson Bancshares, Inc., a bank holding company. You may request from the Federal Reserve Bank of St. Louis, PO BOX 442, St. Louis, MO 63166-0442, an announcement of applications covered by the CRA filed by bank holding companies.

PUBLIC DISCLOSURE

May 5, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Fidelity Bank
RSSD #848248**

**330 West Broadway
West Memphis, Arkansas 72301**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

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, nor should it be construed as, an assessment of the financial condition of the 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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INSTITUTION’S CRA RATING: This institution is rated SATISFACTORY.

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

Fidelity Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank’s lending and community development activities. The factors supporting the institution’s rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the institution’s size, financial condition, and credit needs of the assessment areas (AAs).
- A majority of loans and other lending-related activities are in the AAs.
- The distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels (including low- and moderate-income (LMI)) and businesses of different revenue sizes.
- The geographic distribution of loans reflects a reasonable dispersion throughout the AAs.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s overall community development performance demonstrates excellent responsiveness to the community development needs of its AAs, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AAs. The bank has responded to these needs through community development loans, qualified investments, and community development services.

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC) Intermediate Small Bank Procedures. The Intermediate Small Bank Examination Procedures entail two performance tests: the Lending Test and the Community Development Test. Bank performance under these tests is rated at the institution level.

The bank maintains operations in two delineated AAs within the state of Arkansas. The primary AA is located within the Memphis, Tennessee-Mississippi-Arkansas metropolitan statistical area (Memphis MSA) and is composed solely of Crittenden County. The second AA is located within a nonMSA portion of eastern Arkansas and is composed of Cross County in its entirety.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each AA completed as part of this evaluation. Deposit information in the

following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2024.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	\$ (000s)	%	
Crittenden County	4	80.0	503,273	98.6	Full Scope
Cross County	1	20.0	7,215	1.4	Limited Scope
TOTAL¹	5	100.0	510,488	100.0	1 – Full Scope

In light of branch structure, loan and deposit activity, and the bank’s CRA evaluation history, CRA performance in the Crittenden County AA was given primary consideration, as it contains the majority of the bank’s loan and deposit activity.

Furthermore, Home Mortgage Disclosure Act (HMDA) and small business loans were used to evaluate the bank’s lending performance, as these loan categories are considered the bank’s core business lines based on lending volume and the bank’s stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. However, as the bank has a greater lending volume for its HMDA loans, performance based on this loan category carried the most significance toward the bank’s overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	September 30, 2021 – March 31, 2025
Assessment Area Concentration	January 1, 2023 – December 31, 2023
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	August 23, 2021 – May 4, 2025
Community Development Activities	

Lending Test analyses often entail comparisons of bank performance to AA demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, AA demographics are based on 2020 American Community Survey (ACS) data, and certain business demographics are based on 2023 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank’s lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$429.3 million to \$567.1 million as of March 31, 2025.

¹ Note: In this table and others throughout this document, percentages may not total 100% due to rounding.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs:

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered.

To augment this evaluation, one community contact interview was conducted with a member of the local community to ascertain specific credit needs, opportunities, and local market conditions within the bank's AAs. Information from this interview also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from this community contact interview are included in the *Description of Assessment Area* section applicable to the AA in which it was conducted.

DESCRIPTION OF INSTITUTION

Fidelity Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Carlson Bancshares, Inc., a one-bank holding company. The bank and its holding company are both headquartered in West Memphis, Arkansas, and are certified community development financial institutions (CDFIs). The CDFI certification is awarded by the U.S. Department of the Treasury's CDFI Fund to financial institutions that specialize in serving low-income communities and individuals. The CDFI Fund's mission is to empower low-income and underserved people and communities to enter the financial mainstream.

The bank's branch network consists of five branches (including the main office), all of which are full-service with drive-up accessibility. In addition to these branches, the bank also operates a loan production office (LPO) in Greene County, Arkansas. Each of the Crittenden County branches maintains a cash-dispensing-only ATM on-site. The Cross County branch maintains three on-site deposit-accepting ITMs, while the bank's LPO includes one cash-dispensing-only ITM. During the review period, the bank opened the aforementioned LPO in Greene County and relocated and converted an existing LPO to a full-service branch in Cross County. Based on this branch network and other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities, the bank is well positioned to deliver financial services to most of its AAs.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its AAs based on its available resources and financial products. As of March 31, 2025, the bank reported total assets of \$546.5 million. As of the same date, loans and leases outstanding were \$265.7 million (48.6 percent of total assets), and deposits totaled \$510.0 million. The bank’s loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of March 31, 2025		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Commercial Real Estate	127,469	48.0
1-4 Family Residential	35,104	13.2
Farm Loans	27,200	10.2
Construction and Development	24,391	9.2
Farmland	21,898	8.2
Commercial and Industrial	20,621	7.8
Multifamily Residential	5,620	2.1
Loans to Individuals	3,413	1.3
Total Other Loans	12	0.0
TOTAL	265,728	100

As indicated by the table above, a significant portion of the bank’s lending resources is directed to commercial real estate loans and loans secured by 1-4 family residential properties.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on August 23, 2021.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Fidelity Bank meets the standards for a satisfactory Lending Test rating under the intermediate small bank procedures, which evaluate bank performance under the following five criteria, as applicable.

Loan-to-Deposit (LTD) Ratio

One indication of the bank’s overall level of lending activity is its LTD ratio. The table below displays the bank’s average LTD ratio in comparison to those of regional peers. The average LTD ratio represents a 15-quarter average, dating back to the bank’s last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size \$ (000s) as of March 31, 2025	Average LTD Ratio (%)
Fidelity Bank	West Memphis, Arkansas	546,524	49.8
Regional Banks	Forrest City, Arkansas	567,061	58.7
	Helena, Arkansas	429,333	99.6
	Wynne, Arkansas	553,354	93.9

Based on data from the previous table, the bank’s level of lending is lower than that of other banks in the region. During the review period, the bank’s quarterly LTD ratio experienced varying trends, with a high and low of 55.0 and 44.8 percent, respectively. However, roughly 32.5 percent of the bank’s deposits, as of March 31, 2025, were public funds deposited by state and political subdivisions, which the bank is not permitted to lend against. After adjusting for these deposits, the bank’s LTD ratio, as of March 31, 2025, is 76.1 percent, which is more comparable to the other banks in the region, reflecting reasonable performance given the bank’s size, financial condition, and credit needs of its AAs.

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank’s AAs.

Lending Inside and Outside the Assessment Areas								
January 1, 2023 through December 31, 2023								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
HMDA	51	83.6	6,205	42.3	10	16.4	8,479	57.7
Small Business	36	63.2	3,756	64.9	21	36.8	2,034	35.1
TOTAL LOANS	87	73.7	9,961	48.7	31	26.3	10,513	51.3

A majority of loans and other lending-related activities were made in the bank’s AAs. As shown above, 73.7 percent of the total loans were made inside the AAs, accounting for 48.7 percent of the dollar volume of total loans. Two multifamily housing loans made outside of the bank’s AAs contributed to a majority of loans by dollar volume being outside the bank’s AAs.

Borrower and Geographic Distribution

Overall, performance by borrower’s income/revenue profile is reasonable, based on the analyses of lending in the full-scope AA, as displayed in the following table.

Full-Scope Assessment Area	Loan Distribution by Borrower’s Profile
Crittenden County	Reasonable

Limited-Scope Assessment Area	Loan Distribution by Borrower’s Profile
Cross County	Consistent

As displayed in the following table, the bank’s overall distribution of lending by income level of census tract reflects reasonable penetration based on the analyses of lending in the full-scope AA.

Full-Scope Assessment Area	Geographic Distribution of Loans
Crittenden County	Reasonable

Limited-Scope Assessment Area	Geographic Distribution of Loans
Cross County	Consistent

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (August 23, 2021 through May 4, 2025).

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test is rated outstanding. Considering the bank’s capacity and the need and availability of such opportunities for community development in the full-scope AA, the bank demonstrates excellent responsiveness to the community development needs of its full-scope AA.

Full-Scope Assessment Area	Community Development Test Performance Conclusions
Crittenden County	Outstanding

Limited-Scope Assessment Area	Community Development Test Performance Conclusions
Cross County	Below

While performance varied between the full-scope AA and limited-scope AA, the overall Community Development Test rating was based on performance in the bank’s primary AA, Crittenden County.

Total Community Development Activities Inside Assessment Areas August 23, 2021 – May 4, 2025		
Community Development Component	#	\$
Loans	20	33.1 million
Investments, Current and Prior	13	6.3 million
Current Period	1	420,000
Prior Period, Still Outstanding	12	5.9 million
Donations	31	52,590
Services	18 services 475 hours	14 organizations

During the review period, the bank made 20 qualifying loans in its AAs totaling approximately \$33.1 million. Of those loans, 16 were for economic development, and 4 were related to community services.

The bank also made community development investments and donations in its AAs totaling \$6.4 million. This amount included 1 new qualified investment totaling \$420,000, 12 continuing investments made in a prior review period totaling \$5.9 million, and 31 donations totaling \$52,590. All of the investments were municipal bonds issued by qualifying school districts for community services.

During the review period, bank personnel used financial expertise to log 18 service activities to 14 different community development organizations within the bank's AAs, constituting 475 hours of community services. Service activities included delivering financial education in schools that primarily serve LMI families, providing financial expertise to community service organizations as board members, and assisting in fundraising efforts for local scholarships.

In addition to meeting the community development needs of its own AAs, the bank made 109 qualified investments totaling approximately \$44.5 million in the broader statewide region that includes the bank's AAs. These qualified investments were municipal bonds purchased in qualifying school districts.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CRITTENDEN COUNTY ASSESSMENT AREA

Bank Structure

The bank operates four of its five offices (80.0 percent) in this AA. Of the four offices, one is located in a low-income census tract, one is located in a moderate-income census tract, and two are located in a middle-income census tract. Since the last evaluation, the bank did not open or close any branches in this AA. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its AA.

General Demographics

The AA comprises Crittenden County in its entirety, which is one of five counties that make up the Memphis MSA. This is the bank's primary AA and is located adjacent to the Mississippi River in eastern Arkansas. Based on 2020 ACS data, the AA population was 48,163.

According to the FDIC Deposit Market Share Report data, as of June 30, 2024, there were eight FDIC-insured depository institutions in the AA operating 15 branches. Fidelity Bank ranked second in deposit market share, encompassing 25.2 percent of total deposit dollars.

Credit needs in the AA include a mix of residential real estate and business loan products. Other particular credit needs in the AA, as noted primarily from the community contact, include affordable housing options and down payment assistance programs for LMI families. Additional needs include restoration of aging homes in the AA.

Income and Wealth Demographics

The following table summarizes the distribution of AA census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	5	8	4	3	0	20
	25.0%	40.0%	20.0%	15.0%	0.0%	100.0%
Family Population	2,596	4,454	2,449	2,456	0	11,995
	21.7%	37.3%	20.5%	20.5%	0.0%	100.0%

As shown in the preceding table, 65.0 percent of the census tracts in the AA are LMI geographies, but only 59.0 percent of the family population resides in these tracts. Low-income areas are concentrated around West Memphis. Moderate-income areas are predominately located in the southern and western parts of the AA.

Based on 2020 ACS data, the median family income for the AA was \$52,606. At the same time, median family incomes for Arkansas and the Memphis MSA were \$62,067 and \$68,008, respectively. More recently, the FFIEC estimates the 2023 median family income for Arkansas and the Memphis MSA to be \$63,400 and \$79,200, respectively. The following table displays population percentages of AA families by income level compared to Arkansas and Memphis MSA family populations.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	3,830	2,144	1,980	4,001	11,955
	32.0%	17.9%	16.6%	33.5%	100.0%
Memphis MSA	77,459	52,873	59,386	137,452	327,170
	23.7%	16.2%	18.2%	42.0%	100.0%
Arkansas	165,087	136,380	155,142	313,502	770,111
	21.4%	17.7%	20.2%	40.7%	100.0%

As shown in the table above, 49.9 percent of families within the AA were considered LMI, which is greater than LMI family percentages for both the state of Arkansas and the Memphis MSA, which were 39.1 percent and 39.9 percent, respectively. In addition, the percentage of families living below the poverty threshold in the AA (17.0 percent) is above the level in the Memphis MSA (13.1 percent) and the state of Arkansas (11.8 percent). Considering these factors, the AA appears less affluent than the Memphis MSA and Arkansas as a whole.

Housing Demographics

Based on housing values, income levels, and rental costs, housing in the AA appears to be more affordable than the Memphis MSA but less affordable than the state of Arkansas as a whole.

Housing Cost Burden (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Assessment Area	78.8	22.8	45.3	49.4	28.9	16.8
Memphis MSA	79.6	51.3	46.4	64.3	33.7	19.2
Arkansas	69.8	35.3	37.3	53.0	25.2	15.3

Cost burden is housing cost that equals 30 percent or more of household income.

According to the table above, the cost burden for all renters in the AA is less than the Memphis MSA and greater than the state of Arkansas. Similarly, the cost burden of all owners in the AA is less than the Memphis MSA and greater than the state of Arkansas. In addition, the cost burden for LMI renters and owners is less in the AA than in the Memphis MSA. This is further supported by the AA having a median rental rate (\$734/month) and median housing value (\$122,700) that are less than the median rental rate (\$944/month) and median housing value (\$161,311) in the Memphis MSA.

Industry and Employment Demographics

The AA supports a large and diverse business community, including a strong small business sector, as evidenced by the Dun & Bradstreet data indicating that 92.4 percent of AA businesses have gross annual revenues of \$1 million or less. Furthermore, according to the U.S. Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, there are 13,632 employees in the AA (including 2,569 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the AA are manufacturing (16.7 percent), followed by accommodation and food services (15.0 percent) and healthcare and social assistance (13.9 percent). The table below details BLS unemployment data (not seasonally adjusted) for the AA, the Memphis MSA, and the state of Arkansas.

Unemployment Levels (%)				
Dataset	Time Period (Annual Average)			
	2021	2022	2023	2024 (Jan.– Nov.)
Assessment Area	5.5	3.9	4.2	4.4
Memphis MSA	6.3	4.2	4.0	4.1
Arkansas	4.0	3.2	3.3	3.4

As shown above, the unemployment levels for the AA declined to a low in 2022 and then slowly began rising. The low unemployment rate in 2022 can be partially explained by an improvement in employment following the end of the COVID-19 pandemic. The unemployment rates in the AA during the review period have been consistently higher than the state of Arkansas, and while unemployment rates in the AA were lower than the Memphis MSA during the beginning of the review period, they are now higher.

Community Contact Information

Information from one community contact was used to help shape the performance context in which the bank's activities in this AA were evaluated. The community contact interview was with an individual specializing in small business development. The contact categorized the overall economic conditions in the area as challenging due to high poverty rates and increased cost of living. However, the contact stated that Crittenden County is better than other parts of the Arkansas Delta economically due to its geographic proximity to Memphis, with many individuals commuting across the Mississippi River for better opportunities.

The community contact cited the need for affordable housing in the area. According to the contact, in recent years new construction was built in West Memphis; however, most of this construction was built in middle- and upper-income areas and is unaffordable to LMI families. Further, the contact indicated that the current stock of affordable housing is dated and likely needs repairs that some families would seek to avoid. In addition to the lack of affordable housing, the contact cited that poor credit characteristics of borrowers and the inability to afford mortgage down payments as other barriers preventing homeownership in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CRITTENDEN COUNTY ASSESSMENT AREA

LENDING TEST

The bank’s overall distribution of loans by borrower’s income/revenue profile reflects reasonable penetration among borrowers of different income levels and businesses of different revenue sizes. Furthermore, the overall geographic distribution of loans reflects reasonable penetration throughout Crittenden County.

Loan Distribution by Borrower’s Profile

Overall, the bank’s loan distribution by borrower’s profile is reasonable, based on performance from both loan categories reviewed. The bank’s performance in making HMDA loans to LMI borrowers is poor, while lending to small businesses in the assessment area is excellent.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$79,200 for the Memphis MSA as of 2023). The following table shows the distribution of HMDA-reported loans by borrower income level in comparison to family population income demographics for the AA. Additionally, 2023 aggregate data for the AA is displayed.

Borrower Distribution of HMDA Loans Assessment Area: Crittenden County								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	6.4	0	0.0	3.2	32.0
	Moderate	2	9.5	22.4	142	5.7	17.7	17.9
	Middle	3	14.3	20.1	355	14.3	20.9	16.6
	Upper	8	38.1	19.5	1,453	58.6	25.9	33.5
	Unknown	8	38.1	31.6	531	21.4	32.2	0.0
	TOTAL	21	100.0	100.0	2,481	100.0	100.0	100.0
Refinance	Low	0	0.0	8.1	0	0.0	3.9	32.0
	Moderate	1	14.3	22.6	150	12.1	15.1	17.9
	Middle	0	0.0	21.8	0	0.0	22.2	16.6
	Upper	6	85.7	25.8	1,087	87.9	30.3	33.5
	Unknown	0	0.0	21.8	0	0.0	28.4	0.0
	TOTAL	7	100.0	100.0	1,237	100.0	100.0	100.0

Home Improvement	Low	0	0.0	5.3	0	0.0	2.9	32.0
	Moderate	2	18.2	7.9	232	28.6	12.5	17.9
	Middle	2	18.2	26.3	118	14.5	15.7	16.6
	Upper	5	45.5	52.6	296	36.5	61.0	33.5
	Unknown	2	18.2	7.9	165	20.3	8.0	0.0
	TOTAL	11	100.0	100.0	811	100.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	N/A
	Moderate	0	0.0	0.0	0	0.0	0.0	N/A
	Middle	0	0.0	0.0	0	0.0	0.0	N/A
	Upper	0	0.0	0.0	0	0.0	0.0	N/A
	Unknown	1	100.0	100.0	632	100.0	100.0	N/A
	TOTAL	1	100.0	100.0	632	100.0	100.0	N/A
Other Purpose Closed/Exempt	Low	1	14.3	4.8	31	11.2	1.5	32.0
	Moderate	3	42.9	19.0	108	39.1	6.5	17.9
	Middle	0	0.0	28.6	0	0.0	34.8	16.6
	Upper	3	42.9	42.9	137	49.6	53.0	33.5
	Unknown	0	0.0	4.8	0	0.0	4.3	0.0
	TOTAL	7	100.0	100.0	276	100.0	100.0	100.0
HMDA TOTALS	Low	1	2.1	6.6	31	0.6	3.1	32.0
	Moderate	8	17.0	21.3	632	11.6	16.4	17.9
	Middle	5	10.6	20.3	473	8.7	20.2	16.6
	Upper	22	46.8	22.4	2,973	54.7	26.3	33.5
	Unknown	11	23.4	29.4	1,328	24.4	34.0	0.0
	TOTAL	47	100.0	100.0	5,437	100.0	100.0	100.0

As the preceding table indicates, the bank's lending to low-income borrowers (2.1 percent) is substantially below the low-income family population figure (32.0 percent) and below the aggregate lending level to low-income borrowers (6.6 percent), reflecting poor performance. The bank's lending to moderate-income borrowers (17.0 percent) is approaching the aggregate lending level to such borrowers (21.3 percent) and the moderate-income family population (17.9 percent) residing in the AA, reflecting reasonable performance. Nevertheless, on a combined basis, the bank's overall distribution of loans by borrower's profile is deemed poor.

Small business loans were reviewed to determine the bank’s lending levels to businesses of different sizes. The following table shows the distribution of 2023 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size								
Assessment Area: Crittenden County								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	27	96.4	45.9	3,099	89.9	35.4	92.4
	Over \$1 Million/ Unknown	1	3.6	54.1	350	10.1	64.6	7.6
	TOTAL	28	100.0	100.0	3,449	100.0	100.0	100.0
Loan Size	\$100,000 or Less	21	75.0	91.8	761	22.1	30.7	
	\$100,001– \$250,000	1	3.6	4.6	160	4.6	20.4	
	\$250,001–\$1 Million	6	21.4	3.7	2,528	73.3	48.8	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	28	100.0	100.0	3,449	100.0	100.0	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	21	77.8		761	24.6	
		\$100,001–\$250,000	1	3.7		160	5.2	
		\$250,001–\$1 Million	5	18.5		2,178	70.3	
		Over \$1 Million	0	0.0		0	0.0	
		TOTAL	27	100.0		3,099	100.0	

As the table shows, a substantial majority of the bank’s originated small business loans (96.4 percent) were made to businesses with revenues of \$1 million or less. Although demographic data indicates that 92.4 percent of businesses within the AA had revenues of \$1 million or less, aggregate data shows that less than half of all business loans were made to small businesses (45.9 percent). Therefore, the institution’s lending to small businesses is excellent.

Geographic Distribution of Loans

As previously noted, the Crittenden County AA contains five low-income and eight moderate-income census tracts, representing 65.0 percent of all AA census tracts. Overall, the bank’s geographic distribution of loans in this AA reflects reasonable penetration throughout these LMI census tracts, based on the HMDA and small business loan categories. Performance in the HMDA loan category carried the most significance in the overall conclusion. Furthermore, based on reviews from both loan categories, the bank had loan activity in 90.0 percent of the AA census tracts, and there were no conspicuous lending gaps noted in LMI areas. This information supports the conclusion that the bank’s overall geographic distribution of loans is reasonable. The following table displays the geographic distribution of 2023 HMDA loans compared to owner-occupied housing demographics for the AA and aggregate data.

Geographic Distribution of HMDA Loans Assessment Area: Crittenden County								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	8	38.1	9.5	868	35.0	5.9	14.9
	Moderate	8	38.1	29.3	821	33.1	23.5	36.5
	Middle	2	9.5	22.9	255	10.3	23.0	20.6
	Upper	3	14.3	38.3	537	21.6	47.7	28.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	21	100.0	100.0	2,481	100.0	100.0	100.0
Refinance	Low	0	0.0	7.3	0	0.0	2.9	14.9
	Moderate	4	57.1	29.0	774	62.6	28.9	36.5
	Middle	0	0.0	23.4	0	0.0	23.0	20.6
	Upper	3	42.9	40.3	463	37.4	45.3	28.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	7	100.0	100.0	1,237	100.0	100.0	100.0
Home Improvement	Low	3	27.3	15.8	220	27.1	15.7	14.9
	Moderate	7	63.6	39.5	565	69.7	46.6	36.5
	Middle	1	9.1	23.7	26	3.2	21.0	20.6
	Upper	0	0.0	21.1	0	0.0	16.7	28.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	11	100.0	100.0	811	100.0	100.0	100.0
Multifamily	Low	1	100.0	25.0	632	100.0	9.3	29.6
	Moderate	0	0.0	50.0	0	0.0	82.0	38.6
	Middle	0	0.0	25.0	0	0.0	8.7	30.7
	Upper	0	0.0	0.0	0	0.0	0.0	1.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	1	100.0	100.0	632	100.0	100.0	100.0
Other Purpose Closed/Exempt	Low	1	14.3	9.5	31	11.2	2.7	14.9
	Moderate	1	14.3	28.6	65	23.6	43.4	36.5
	Middle	2	28.6	14.3	75	27.2	6.8	20.6
	Upper	3	42.9	47.6	105	38.0	47.1	28.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	7	100.0	100.0	276	100.0	100.0	100.0

HMDA TOTALS	Low	13	27.7	9.4	1,751	32.2	5.7	14.9
	Moderate	20	42.6	30.1	2,225	40.9	27.5	36.5
	Middle	5	10.6	23.1	356	6.5	22.3	20.6
	Upper	9	19.1	37.4	1,105	20.3	44.6	28.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	47	100.0	100.0	5,437	100.0	100.0	100.0

The bank’s total penetration of low-income census tracts by number of loans (27.7 percent) is nearly double the percentage of owner-occupied housing units in low-income census tracts (14.9 percent) and nearly triple that of other lenders in the AA (9.4 percent). Therefore, the bank’s geographic performance in low-income census tracts is deemed excellent. The bank’s total penetration of moderate-income census tracts by number (42.6 percent) is above the percentage of owner-occupied housing units in moderate-income census tracts (36.5 percent) and the performance of other lenders based on aggregate data (30.1 percent), reflecting excellent performance. Overall, 70.3 percent of the bank’s HMDA loans were made to individuals in LMI census tracts. This is well above the aggregate lending data reported for these areas (39.5 percent) and the percentage of owner-occupied units in these LMI geographies (51.4 percent). Therefore, the bank’s geographic distribution of HMDA loans in LMI areas is excellent.

The following table shows 2023 small business loan activity by geography income level compared to the location of businesses throughout the bank’s AA and 2023 small business aggregate data.

Geographic Distribution of Small Business Loans							
Assessment Area: Crittenden County							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	1	3.6	19.6	22	0.6	26.4	21.9
Moderate	8	28.6	38.6	1,010	29.3	42.3	41.0
Middle	9	32.1	17.9	1,241	36.0	12.0	18.1
Upper	10	35.7	23.5	1,176	34.1	19.0	18.9
Unknown	0	0.0	0.5	0	0.0	0.2	0.0
TOTAL	28	100.0	100.0	3,449	100.0	100.0	100.0

The bank’s lending in low-income census tracts (3.6 percent) is significantly below the estimated percentage of businesses operating inside the census tract (21.9 percent) and aggregate lending levels in low-income census tracts (19.6 percent) reflecting very poor performance. The bank’s small business lending in moderate-income census tracts (28.6 percent) is lower than the aggregate small business lending percentage in moderate-income census tracts (38.6 percent) and the percentage of small businesses in moderate-income census tracts (41.0 percent). Thus, the bank’s performance in moderate-income geographies is deemed poor. Overall, 32.2 percent of the bank’s small business loans are made to businesses in LMI census tracts. This level of lending is below the aggregate (58.2 percent) and the percentage of small businesses located in LMI census tracts

(62.9 percent). As a result, the bank's geographic distribution of small business loans in LMI geographies is poor.

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to community development needs within the Crittenden County AA, considering the bank's capacity and the need and availability of such opportunities for community development. The bank addressed these needs through community development loans, qualified investments, and community development services.

During the review period, the bank extended 14 community development loans totaling \$32.2 million in this AA. Of those loans, ten were made for economic development, and four funded community services targeted to LMI individuals or geographies.

Community development investments in the AA totaled \$5.4 million. The amount was composed of 12 qualified investments in the form of municipal bonds purchased in school districts with a majority of students eligible for free or reduced lunches through the USDA National School Lunch Program. In addition, the bank made 26 donations totaling \$47,415 to local community service organizations and qualifying schools.

Finally, five employees contributed 17 community services to 13 organizations, totaling 469 hours, inside the Crittenden County AA. These services were primarily performed by bank employees leading financial literacy classes for students at qualifying schools and LMI individuals in the bank's AA.

CROSS COUNTY NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CROSS COUNTY ASSESSMENT AREA

This AA includes the entirety of Cross County. The bank operates one office in this AA. During the review period, the bank converted an LPO to a full-service branch and relocated to a new location less than one mile from the previous address. Additionally, two middle-income census tracts were considered distressed from 2021–2023 due to population loss. The tables below detail key demographics relating to this AA.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	957	763	764	2,101	4,585
	20.9%	16.6%	16.7%	45.8%	100.0%
Household Population	1,367	1,316	955	2,930	6,568
	20.8%	20.0%	14.5%	44.6%	100.0%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	2	2	2	0	6
	0.0%	33.3%	33.3%	33.3%	0.0%	100.0%
Family Population	0	1,256	1,418	1,911	0	4,585
	0%	27.4%	30.9%	41.7%	0.0%	100.0%
Household Population	0	2,114	1,924	2,530	0	6,568
	0%	32.2%	29.3%	38.5%	0.0%	100.0%
Business Institutions	0	188	117	223	0	528
	0%	35.6%	22.2%	42.2%	0.0%	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CROSS COUNTY ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in this AA is consistent with the bank's Lending Test performance in the AA that was reviewed using full-scope procedures, as detailed in the following table. For more detailed information relating to the bank's Lending Test performance in this AA, see the tables in *Appendix B*.

Lending Test Criteria	Performance
Geographic Distribution of Loans	Consistent
Distribution of Loans by Borrower's Profile	Consistent
OVERALL	Consistent

COMMUNITY DEVELOPMENT TEST

The bank's Community Development Test performance in this AA is below the bank's Community Development Test performance in the Crittenden County AA, which was reviewed using full-scope procedures.

During the review period, the bank made six community development loans totaling \$990,250. All six loans were made for economic development purposes. Additionally, the bank made one investment of \$930,000, which was a municipal bond purchased in a school district where the majority of students were eligible for free or reduced lunches. The bank also made five donations totaling \$5,174. Finally, one employee participated in a community service activity, accounting for six hours of service at Wynne High School, during the review period.

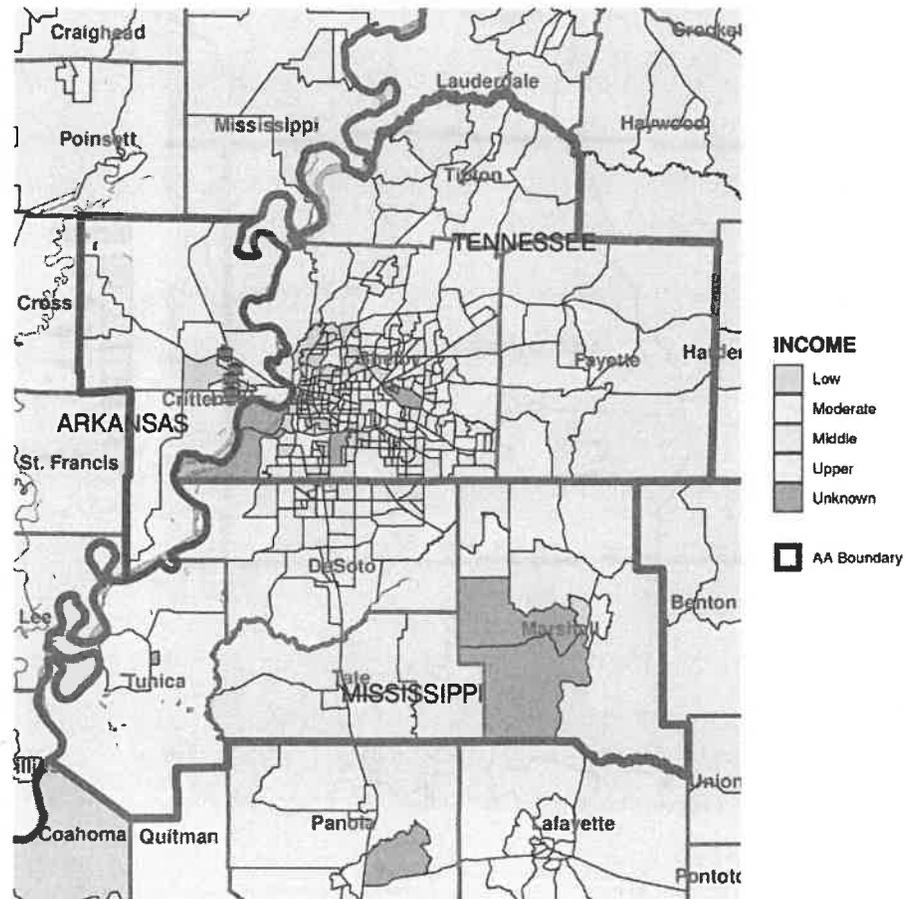
APPENDIX A – MAPS OF ASSESSMENT AREAS

ARKANSAS

Crittenden County Assessment Area

Fidelity Bank

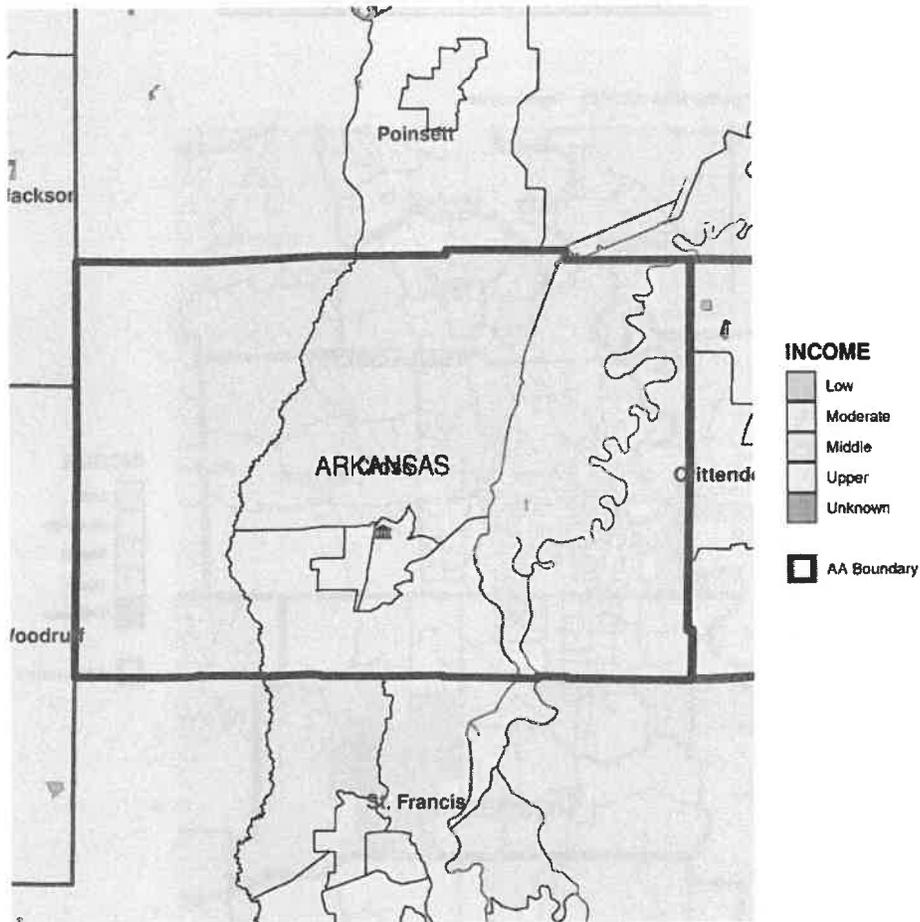
Memphis, TN-AR-MS partial MSA AA 2023 - Tract Income



Cross County Assessment Area

Fidelity Bank

Cross County, AR NonMSA AA 2023 - Tract Income



**APPENDIX B – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE
REVIEW ASSESSMENT AREAS**

Cross County Assessment Area

Borrower Distribution of HMDA Loans Assessment Area: Cross County								
Product Type	Borrower Income Levels	2023						
		Count			Dollars			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	5.9	0	0.0	2.9	20.9
	Moderate	0	0.0	9.5	0	0.0	6.9	16.6
	Middle	1	100.0	18.6	72	100.0	15.5	16.7
	Upper	0	0.0	33.9	0	0.0	44.6	45.8
	Unknown	0	0.0	32.1	0	0.0	30.0	0.0
	TOTAL	1	100.0	100.0	72	100.0	100.0	100.0
Refinance	Low	0	0.0	6.9	0	0.0	3.0	20.9
	Moderate	0	0.0	3.4	0	0.0	2.2	16.6
	Middle	0	0.0	8.6	0	0.0	5.8	16.7
	Upper	0	0.0	46.6	0	0.0	52.8	45.8
	Unknown	0	0.0	34.5	0	0.0	36.2	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement	Low	0	0.0	13.3	0	0.0	12.6	20.9
	Moderate	0	0.0	6.7	0	0.0	12.7	16.6
	Middle	0	0.0	20.0	0	0.0	11.7	16.7
	Upper	0	0.0	46.7	0	0.0	56.8	45.8
	Unknown	0	0.0	13.3	0	0.0	6.1	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	N/A
	Moderate	0	0.0	0.0	0	0.0	0.0	N/A
	Middle	0	0.0	0.0	0	0.0	0.0	N/A
	Upper	0	0.0	0.0	0	0.0	0.0	N/A
	Unknown	0	0.0	100.0	0	0.0	100.0	N/A
	TOTAL	0	0.0	100.0	0	0.0	100.0	N/A
Other Purpose LOC	Low	0	0.0	50.0	0	0.0	45.5	20.9
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	16.7
	Upper	0	0.0	50.0	0	0.0	54.5	45.8
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0

Other Purpose Closed/Exempt	Low	0	0.0	10.0	0	0.0	5.1	20.9
	Moderate	0	0.0	10.0	0	0.0	10.4	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	16.7
	Upper	1	33.3	60.0	40	5.7	26.0	45.8
	Unknown	2	66.7	20.0	656	94.3	58.6	0.0
	TOTAL	3	100.0	100.0	696	100.0	100.0	100.0
Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.9
	Moderate	0	0.0	0.0	0	0.0	0.0	16.6
	Middle	0	0.0	0.0	0	0.0	0.0	16.7
	Upper	0	0.0	0.0	0	0.0	0.0	45.8
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
HMDA TOTALS	Low	0	0.0	6.8	0	0.0	3.1	20.9
	Moderate	0	0.0	8.1	0	0.0	5.9	16.6
	Middle	1	25.0	15.9	72	9.4	12.7	16.7
	Upper	1	25.0	37.5	40	5.2	44.2	45.8
	Unknown	2	50.0	31.7	656	85.4	34.1	0.0
	TOTAL	4	100.0	100.0	768	100.0	100.0	100.0

Small Business Loans by Revenue and Loan Size								
Assessment Area: Cross County								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	8	100.0	49.3	308	100.0	46.7	91.1
	Over \$1 Million/Unknown	0	0.0	50.7	0	0.0	53.3	8.9
	TOTAL	8	100.0	100.0	308	100.0	100.0	100.0
Loan Size	\$100,000 or Less	8	0.0	96.8	308	0.0	66.9	
	\$100,001-\$250,000	0	0.0	2.7	0	0.0	25.6	
	\$250,001-\$1 Million	0	0.0	0.5	0	0.0	7.6	
	Over \$1 Million	0	0.0	0.0	0	0.0	0.0	
	TOTAL	8	100.0	100.0	308	100.0	100.0	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	8	0.0		0	0.0		
	\$100,001-\$250,000	0	0.0		0	0.0		
	\$250,001-\$1 Million	0	0.0		0	0.0		
	Over \$1 Million	0	0.0		0	0.0		
	TOTAL	8	100.0		308	100.0		

Geographic Distribution of HMDA Loans Assessment Area: Cross County								
Product Type	Tract Income Levels	2023						
		Count			Dollars			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	25.8	0	0.0	18.2	24.1
	Middle	1	100.0	18.1	72	100.0	14.9	32.4
	Upper	0	0.0	56.1	0	0.0	66.9	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	1	100.0	100.0	72	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	34.5	0	0.0	23.2	24.1
	Middle	0	0.0	25.9	0	0.0	30.3	32.4
	Upper	0	0.0	39.7	0	0.0	46.6	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	40.0	0	0.0	28.6	24.1
	Middle	0	0.0	20.0	0	0.0	26.3	32.4
	Upper	0	0.0	40.0	0	0.0	45.1	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	50.0	0	0.0	10.7	54.8
	Middle	0	0.0	0.0	0	0.0	0.0	1.3
	Upper	0	0.0	50.0	0	0.0	89.3	43.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	24.1
	Middle	0	0.0	0.0	0	0.0	0.0	32.4
	Upper	0	0.0	100.0	0	0.0	100.0	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0

Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	10.0	0	0.0	5.1	24.1
	Middle	2	66.7	30.0	656	94.3	63.1	32.4
	Upper	1	33.3	60.0	40	5.7	31.8	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	3	100.0	100.0	696	100.0	100.0	100.0
Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	100.0	0	0.0	100.0	24.1
	Middle	0	0.0	0.0	0	0.0	0.0	32.4
	Upper	0	0.0	0.0	0	0.0	0.0	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	0	0.0	100.0	0	0.0	100.0	100.0
HMDA TOTALS	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	27.8	0	0.0	18.7	24.1
	Middle	3	75.0	19.7	728	94.8	18.5	32.4
	Upper	1	25.0	52.4	40	5.2	62.8	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	TOTAL	4	100.0	100.0	768	100.0	100.0	100.0

Geographic Distribution of Small Business Loans Assessment Area: Cross County							
Tract Income Levels	2023						
	Count			Dollars			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ (000s)	\$ %	\$ %	%
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	50.0	30.1	150	48.7	20.4	35.6
Middle	2	25.0	26.9	68	22.1	46.5	22.2
Upper	2	25.0	41.1	90	29.2	32.5	42.2
Unknown	0	0.0	1.8	0	0.0	0.5	0.0
TOTAL	8	100.0	100.0	308	100.0	100.0	100.0

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely, depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the

following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives 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 who do 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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



LOCATIONS

<u>Location Name</u>	<u>Address</u>	<u>Date Opened</u>	<u>Geography</u>
Main Office	330 W. Broadway West Memphis, AR72301	Nov-66	32820/05/035/0303.02
Mid Continent Office	350 W Service Rd West Memphis, AR 72301	Aug-96	32820/05/035/0302.01
Marion Office	330 W Military Road Marion, AR 72364	Oct-07	32820/05/035/0308.05
Midway Office	1200 SH 77 Marion, AR 72364	Jul-00	32820/05/035/0308.03
Wynne Office (LPO)	810 Hwy 64 Suite 9 Wynne, AR 72396	Aug-19	NA/05/037/9506.00
Paragould Office	4763 Hwy 135 N Paragould, AR 72450	4Q-22	NA/05/055/4802.00
Wynne Office (replacing LPO)	1015 Hwy 64 Wynne, AR 72396	1Q-24	NA/05/037/9506.00

Notes:

- **Automated Teller Machines are available at all offices.**
- **Safety Deposit Boxes are not available at the Mid-Continent and Midway Offices.**
- **Account Information is available by telephone from all offices. (Excluding Paragould)**
- **Loan Production is available at the Main, Marion, Wynne and Paragould offices.**
- **All other services, products and transaction fees are available from all offices. (Excluding LPO Paragould)**
- **Interactive Teller Machines available at Wynne location in 2024.**

OPENINGS AND/OR CLOSINGS OF LOCATIONS

<u>Location Name</u>	<u>Address</u>	<u>Date</u>	<u>Geography</u>
Wynne Office	810 Hwy 64 Suite 9 Wynne, AR 72396	Aug-2019	NA/05/037/9506.00
Paragould Office	4763 HWY 135 N Paragould, AR 72450	Oct-2022	NA/05/055/4802.00
Wynne Office (replacing LPO)	1015 Hwy 64 Wynne, AR 72396	1Q-24	NA/05/037/9506.00

FEE SCHEDULE

FIDELITY BANK
MAIN OFFICE
330 WEST BROADWAY
WEST MEMPHIS, Arkansas 72301
(870)735-8700
www.fidelitybanker.com

FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

An overdraft fee of \$32.00 will be charged per item for covering overdrafts created by check or draft, in-person withdrawal, ATM withdrawal, or other electronic means.

MISCELLANEOUS FEES

Account Activity Printout	\$2.00
Account Early Closeout Fee (Closed within 6 months of opening)	\$25.00
Account Research Charge (Per Statement Copy)	\$5.00
Account Research Charge (Per Hour)	\$20.00
Cashier's Check(Customer Only)	\$5.00
Collection Fee	\$25.00
Commercial Account Credit Inquiry	\$5.00
Dormant Fee (One Year with no Activity; Charged Quarterly Until Active)	\$1.50
Night Deposit Lock Bag	\$30.00
Nonsufficient Funds (NSF)	\$32.00
Returned Check	\$5.00
Return Mail	\$5.00
Small Zip Deposit Bag	\$3.00
Statement Printout	\$5.00
Stop Payment	\$30.00
Temporary Check (Per Check)	\$1.00
Visa Gift Card	\$3.00
Wire Transfer (Customer)	\$15.00
Wire Transfer (Non Customer)	\$25.00
Wire Transfer (Foreign Wire)	\$75.00

LOCK BOX ANNUAL RENTAL FEES

3 X 5	\$30.00
3 X 10	\$45.00
5 X 5 1/2	\$30.00
5 X 10	\$55.00
7 X 10	\$55.00
10 X 10	\$60.00
Lock Box Drilling	\$350.00
Lock Box Replacement Key	\$50.00

OTHER FEES

Notary Fee Customer	\$5.00
Notary Fee Non Customer	\$20.00
Medallion Stamp Fee	\$100.00
Paper Statement Fee (Consumer Accounts)	\$2.00



Lending

Loan Processing Fees				
New Loans & Renewals				
Loan Amount	\$0-\$4,999	\$5000-\$24,999	25,000-\$99,999.00	\$100,000 +
Fee Amount	\$100	\$200	\$300	\$400

2024 FFIEC Census Report - Summary Census Demographic Information
State: 05 - ARKANSAS (AR)
County: 035 - CRITTENDEN COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
05	035	0301.01	Low	No	35.91	\$83,000	\$29,805	\$24,290	1991	94.73	1886	189	767
05	035	0301.02	Low	No	39.99	\$83,000	\$33,192	\$27,050	2805	94.26	2644	692	1382
05	035	0302.01	Moderate	No	73.81	\$83,000	\$61,262	\$49,926	5355	41.12	2202	1005	2040
05	035	0302.02	Upper	No	132.68	\$83,000	\$110,124	\$89,750	3400	33.00	1122	1309	1423
05	035	0303.01	Moderate	No	76.67	\$83,000	\$63,636	\$51,865	3034	77.52	2352	622	984
05	035	0303.02	Low	No	28.14	\$83,000	\$23,356	\$19,038	2741	88.18	2417	236	655
05	035	0305.03	Middle	No	84.70	\$83,000	\$70,301	\$57,292	1400	98.14	1374	204	824
05	035	0306.01	Moderate	No	65.60	\$83,000	\$54,448	\$44,375	759	60.21	457	148	390
05	035	0306.02	Moderate	No	56.05	\$83,000	\$46,522	\$37,917	3696	66.94	2474	733	1609
05	035	0307.01	Moderate	No	78.13	\$83,000	\$64,848	\$52,852	886	33.97	301	345	502
05	035	0307.02	Moderate	No	69.91	\$83,000	\$58,025	\$47,292	879	77.25	679	220	381
05	035	0307.03	Low	No	36.27	\$83,000	\$30,104	\$24,535	906	33.00	299	169	465
05	035	0308.03	Upper	No	137.47	\$83,000	\$114,100	\$92,988	1975	42.94	848	658	721
05	035	0308.04	Middle	No	118.29	\$83,000	\$98,181	\$80,016	4335	59.38	2574	1055	1473
05	035	0308.05	Middle	No	108.04	\$83,000	\$89,673	\$73,080	3396	41.67	1415	566	817
05	035	0308.06	Upper	No	178.40	\$83,000	\$148,072	\$120,673	4209	38.25	1610	1056	1254
05	035	0308.07	Middle	No	114.42	\$83,000	\$94,969	\$77,396	1682	53.27	896	399	640
05	035	0310.00	Moderate	No	69.89	\$83,000	\$58,009	\$47,273	1211	46.99	569	342	588
05	035	0311.00	Moderate	No	72.29	\$83,000	\$60,001	\$48,897	2080	82.36	1713	533	1105
05	035	0312.00	Low	No	34.40	\$83,000	\$28,552	\$23,269	1423	97.19	1383	325	685

* Will automatically be included in the 2025 Distressed or Underserved Tract List

2024 FFIEC Census Report - Summary Census Demographic Information
 State: 05 - ARKANSAS (AR)
 County: 037 - CROSS COUNTY
 Tract: All Tracts



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est. MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
05	037	9501.00	Moderate	No	63.38	\$64,800	\$41,070	\$33,973	1058	60.59	641	275	630
05	037	9502.00	Middle	Yes*	100.00	\$64,800	\$64,800	\$53,599	3150	11.14	351	967	1591
05	037	9503.00	Middle	Yes*	90.36	\$64,800	\$58,553	\$48,432	1355	5.39	73	448	766
05	037	9504.00	Upper	No	132.93	\$64,800	\$86,139	\$71,250	2451	12.24	300	722	1111
05	037	9505.00	Moderate	No	72.30	\$64,800	\$46,850	\$38,750	4408	54.38	2397	778	2008
05	037	9506.00	Upper	No	144.02	\$64,800	\$93,325	\$77,192	4411	22.76	1004	1173	1724
05	037	9999.99	Middle	No	108.46	\$64,800	\$70,282	\$58,133	16833	28.31	4766	4363	7830

* Will automatically be included in the 2025 Distressed or Underserved Tract List

Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	2	260000	0	0	0	0	0	0	1	105000	0	0
Crittenden County/Arkansas/030805														
Loans Originated	0	0	0	0	0	0	1	25000	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	1	25000	0	0	1	25000	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	2	50000	0	0	1	25000	0	0
Crittenden County/Arkansas/030806														
Loans Originated	0	0	1	245000	0	0	0	0	0	0	1	245000	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	1	245000	0	0	0	0	0	0	1	245000	0	0
Crittenden County/Arkansas/030807														
Loans Originated	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	1	295000	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	0	0	1	295000	0	0	0	0	0	0
Crittenden County/Arkansas/031000														
Loans Originated	0	0	0	0	1	155000	1	35000	0	0	1	155000	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	0	0	1	155000	1	35000	0	0	1	155000	0	0
Crittenden County/Arkansas/031200														
Loans Originated	0	0	1	45000	0	0	0	0	0	0	1	45000	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	1	45000	0	0	0	0	0	0	1	45000	0	0
DeSoto County/Mississippi/070830														
Loans Originated	0	0	1	135000	0	0	0	0	0	0	1	135000	0	0
Applications Approved but not Accepted	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Denied by Financial Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Withdrawn by Applicant	0	0	0	0	0	0	0	0	0	0	0	0	0	0
File Closed for Incompleteness	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Applications Received	0	0	1	135000	0	0	0	0	0	0	1	135000	0	0