



PUBLIC DISCLOSURE

August 1, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fifth District Savings Bank
Charter Number 700133

4000 General DeGaulle Drive
New Orleans, LA 70114-8211

Office of the Comptroller of the Currency

3850 North Causeway Blvd.
Suite 1330
Metairie, LA 70002

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The Lending Test is rated: Satisfactory.

The Community Development (CD) test is rated: Outstanding.

The major factors that support this rating include:

- A more than reasonable loan-to-deposit (LTD) ratio given the bank's size, competition, and economic environment.
- A majority of loans being originated in the assessment area (AA).
- A reasonable geographic distribution of home mortgage loans.
- A reasonable distribution of loans to individuals of different income levels given the demographics in the AA and product lines offered by the bank.
- An adequate responsiveness to CD lending in the AAs.
- An excellent responsiveness to CD investment needs.
- An excellent responsiveness to CD service needs.
- Management did not receive any complaints in the AAs during the review period.

LTD Ratio

Considering the bank's size, financial condition, and credit needs of the AA, Fifth District Savings Bank's (FDSB) LTD ratio is more than reasonable. The quarterly average LTD ratio for FDSB during the evaluation period was 89.4 percent. Since the prior examination, FDSB's quarterly LTD ranged from a low of 85.5 percent in the first quarter of 2021 to a high of 93.1 percent in the first quarter of 2020. The quarterly average LTD ratio for similarly-situated financial institutions located within or near the AA was 72.3 percent.

Institution	Assets – As of June 15, 2022 (in thousands)	Average LTD
FDSB	462,470	89.4%
Metairie Bank and Trust Company	630,659	75.8%
Citizens Bank and Trust Company	172,655	78.1%
American Bank and Trust Company	236,530	85.8%
Mississippi River Bank	127,552	59.6%
First National Bank USA	226,771	74.7%

Source: Bank Data

Lending in AA

A majority of FDSB's loans are inside its AA.

FDSB originated and purchased 66 percent of its total loans inside its AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This conclusion is based on the entire population of the institution's primary product during the evaluation period. The findings from the analysis factored into the overall analysis of the geographic distribution of lending by income level of the geography.

Lending Inside and Outside of the AA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans (000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	426	66.1	218	33.9	644	117,341	63.0	68,827	37.0	186,167
Total	426	66.1	218	33.9	644	117,341	63.0	68,827	37.0	186,167

Source: Bank Data. Due to rounding, totals may not equal 100.0%

Description of Institution

FDSB is a full-service, nationally-chartered, federal savings thrift headquartered in New Orleans, Louisiana. FDSB currently operates with seven branches in its AA including its headquarters and one branch located in Orleans Parish. There are an additional four branches located in Jefferson Parish and another branch located in St. Tammany Parish. FDSB's headquarters and one branch in Jefferson Parish are located in a moderate-income census tract (CT). As of June 30, 2022, total assets were \$463 million with total loans and leases of \$343 million. Total deposits were \$383 million and tier 1 capital was 17.5 percent.

Banking hours reasonably meet community needs with lobby hours consistent at all locations. Of the seven branches, four are open on Saturday including the main branch, which is located in a moderate-income CT. Since the previous evaluation, FDSB has added deposit-taking automated teller machines (ATMs) to its main branch and two additional branches. Additionally, FDSB has implemented iPay QuickPay which utilizes Alexa to set up bill payments; SmartPay, which allows customers to use automated clearing house to debit their accounts for loan payments; MyCardRules, which allows cardholders to sign up for notification and set restrictions on their debit cards through an accompanying phone application; and an updated website which is now ADA-compliant, increasing access for the community.

Since the previous performance evaluation (PE), FDSB has opened a new branch located in Orleans Parish, in an upper-income CT and closed a branch in St. Tammany Parish, also in an upper-income CT. All branches have the ability to originate share loans and receive mortgage loan applications. There are no significant differences between products offered at the various branches.

FDSB primarily originates one- to four-family residential mortgages for its own portfolio, which are funded by depositors. FDSB offers home purchase, construction/permanent, vacant lot, home improvement, refinance, home equity lines of credit (HELOCs), and share loans. FDSB has not made

changes to its corporate structure, including any merger or acquisition activities, since the previous PE. As illustrated in the table below, FDSB focuses primarily on residential real estate lending. As of April 13, 2022, the loan portfolio consisted of the following:

FDSB Loan Portfolio		
Loan Category	Dollars (000)	Percentage
Home Mortgage	315,545	94.6
Construction and Land Development	17,060	5.1
Non-Farm and non-Residential	179	>1%
Other (Commercial & Industrial / Consumer)	909	>1%
Total	333,693	100

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

Management has designated portions of the New Orleans-Metairie Metropolitan Statistical Area (MSA) as its AA. The MSA encompasses a total of eight parishes and is too large to reasonably serve and consequently, FDSB has defined its AA as the portions of Orleans, Jefferson, and Plaquemines Parishes located on the west bank of the Mississippi River consisting of portions of Jefferson and Orleans Parishes north of Interstate 10 and Interstate 610 on the east bank of the Mississippi River, and the western portion of St. Tammany Parish. The Mississippi River bisects Orleans and Jefferson Parishes into two parts that are locally termed, the Eastbank and the Westbank. FDSB has chosen the Westbank of Jefferson and Orleans parishes as part of its AA. FDSB's AA is made up of 136 contiguous CTs. Of those, 12 are designated as low-income CTs; 33 as moderate-income CTs; 44 as middle-income CTs; 46 as upper-income CTs; and information was not available for one CT. The AA meets regulatory requirements and does not arbitrarily exclude low- to moderate-income (LMI) CTs.

FDSB has no affiliate or operating subsidiary activities considered when evaluating CRA performance. There were no legal or financial factors impeding FDSB's ability to meet the credit needs in its AA during the evaluation period. FDSB's CRA performance was rated "Satisfactory" in the previous PE dated May 20, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated CRA performance of FDSB using the Interagency Intermediate Small Bank CRA procedures, which focus on the analysis of both the bank's primary loan products and CD activity. The evaluation period for the lending test covered January 1, 2019, through December 31, 2021. Conclusions regarding FDSB's lending performance are based on a review of residential real estate loans. These loans represent all loans reported on the HMDA loan application register for 2019, 2020, and 2021. CD activities include qualifying loans, investments, and services covering the same review period.

We additionally evaluated loans made through the Paycheck Protection Program (PPP). While not a primary product for the review period, we nevertheless deemed it prudent to acknowledge management's activities in addressing the needs of borrowers in their AA during the COVID-19 pandemic.

Selection of Areas for Full-Scope Review

FDSB only operates in one AA in the state of Louisiana; therefore, it will receive a full-scope review.

Ratings

FDSB operates in one state and has one AA, with one primary loan product (one- to four-family residential mortgages) which received full consideration.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that FDSB (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this 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 FDSB's next PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

State Rating

State of Louisiana

CRA rating for the state of Louisiana: Satisfactory

The Lending Test is rated: Satisfactory

The CD Test is rated: Outstanding

The major factors that support this rating include:

- A reasonable geographic distribution of loans in the state.
- A reasonable distribution of loans to individuals of different income levels given the demographics in the AA.
- Adequate CD lending.
- An excellent level of CD investments.
- An excellent level of CD services.

Description of Institution’s Operations in Louisiana

FDSB operates seven locations in one AA within the state of Louisiana as discussed in the “Description of Institution” section of this PE.

FDSB’s primary business strategy focuses on real estate lending. FDSB originates one- to four-family residential mortgage loans, as well as construction/permanent loans, home improvement loans, HELOCs, and share loans. The bank does not originate commercial, small business, or CD secured loans.

FDSB’s competition is significant with the bank competing with several large and regional banks, credit unions, and mortgage banking companies with footprints across the AA. Based on the most recent Deposit Market Share Report, FDSB ranked 12th out of 41 institutions in its AA, holding 1.9 percent of market share. The largest five competitors Hancock Whitney (20.2), JP Morgan Chase (17.0), Capital One (16.0), Regions Bank (11.2), and Gulf Coast Bank (6.8) command approximately 71 percent of the deposit market, evidencing fierce competition in the AA.

The Federal Financial Institutions Examination Council’s (FFIEC) updated 2021 median family income for the AA was \$70,100. The following table depicts income categories:

Median Family Income Ranges				
Median Family Incomes	Low	Moderate	Middle	Upper
	<50%	50% to <80%	80% to <120%	≥120%
\$70,100	<\$35,050	\$35,050 to <\$56,080	\$56,080 to <\$84,120	≥\$84,120
<i>Source: FFIEC</i>				

Low-income families earning a median family income less than \$35,050 represented 21.0 percent of families in the AA, while moderate-income families comprised 15.1 percent of the AA population. According to 2015 ACS US census data, 11.7 percent of families in the AA earned wages below the poverty level.

In addition to these borrowers lending constraints, opportunities for residential home mortgage lending are limited within the 45 low- and moderate-income CTs in the MSA. Of the 12,733 housing units within low-income CTs, approximately 2.3 percent of the units were owner occupied, and 10.4 percent were renter-occupied units with an average gross monthly rent of \$780, contrarily, 8.6 percent of the units were vacant. In moderate-income CTs, there were 52,523 housing units, of which approximately 35 percent of units were rental-occupied units with an average gross monthly rent of \$862, and another 29.6 percent were vacant. Only 14.8 percent of housing units in the moderate-income CTs were owner-occupied.

The average of median housing in the MSA has increased from \$229,356 in 2019 to \$283,876 in 2021 according to recent reports from the National Association of Realtors. The recent rise in home cost was prompted by the economic shutdown caused by the COVID-19 pandemic, which spurred an increase in the demand for home purchases as work from home became permanent and people looked to upsize their living space. Increased demand, low housing supply, and record low mortgage rates have caused the increase in median sales prices, further impeding homeownership for LMI borrowers.

Based on 2021 business demographic data, there were 82,796 non-farm businesses in the AA. Of these, 75,923 (91.7 percent) of the businesses had revenues of less than \$1 million, 2,038 (2.5 percent) had revenues greater than \$1 million, and 4,835 (5.8 percent) did not report revenue information. The AA's economy is dominated by tourism and the finance/insurance/real estate sector, which account for 48.2 percent of jobs in the AA. According to the Bureau of Labor Statistics, as of May 30, 2021, the unemployment rate of the MSA was 7.0 percent, which was slightly higher than the Louisiana state average of 6.1 percent.

The following table depicts the demographic information for the full-scope AA in Louisiana.

Demographic Information of the AA						
FDSB AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	136	8.8	24.3	32.4	33.8	0.7
Population by Geography	548,786	4.7	21.7	36.6	36.5	0.6
Housing Units by Geography	231,200	5.5	22.7	35.3	35.9	0.6
Owner-Occupied Units by Geography	133,743	2.3	14.8	39.4	43.2	0.3
Occupied Rental Units by Geography	71,987	10.4	35.0	29.5	24.0	1.1
Vacant Units by Geography	25,470	8.6	29.6	29.8	31.3	0.7
Businesses by Geography	82,796	4.7	17.6	30.8	46.2	0.7
Farms by Geography	1,424	2.4	13.1	46.5	37.7	0.3
Family Distribution by Income Level	137,597	21.0	15.1	17.8	46.1	0.0
Household Distribution by Income Level	205,730	22.3	14.8	15.5	47.4	0.0
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$70,100	Median Housing Value			\$194,259
			Median Gross Rent			\$934
			Families Below Poverty Level			11.7%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

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

Scope of Evaluation in Louisiana

As previously discussed, the institution has one AA, which received a full-scope review. Consistent with FDSB's primary lending focus, residential real estate loans were analyzed.

While not a primary product, we additionally analyzed loans made through the PPP, as they represent additional positive action management took to address the needs of borrowers in the AA during the COVID-19 pandemic. In total, management made 173 PPP loans during the review period, with 79 of those loans being in the AA. Of those 79, two were made in low-income CTs and 20 were made in moderate-income CTs. When reviewing management's PPP activity in the moderate-income CTs, it should be noted that the percentage of PPP loans made in those geographies exceeded the percentage of businesses and peer lending in those moderate-income geographies and would be considered excellent. Management should be commended for meeting the needs of borrowers in their AA during the COVID-19 pandemic, especially considering that such loan products were not the type of loans management normally offers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

FDSB's performance under the Lending Test in Louisiana is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, FDSB's lending performance in the state of Louisiana is reasonable.

Distribution of Loans by Income Level of the Geography

FDSB exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans within low- and moderate-income CTs in the AA is considered reasonable given FDSB's size, competition, and limited available housing. While the percentage of loans is less than the comparator in the low-income CTs, it is greater than peer and therefore considered reasonable.

Management's lending in the moderate-income CTs is less than both the demographic comparator and peer but is nevertheless considered reasonable. Management's lending in moderate-income CTs is only slightly less than peer and given the significant competition in the AA and management's market share, lending performance is reasonable.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Lending to borrowers of different income levels for residential real estate loans in the bank's AA is reasonable, considering the high cost of homes, limited housing stock, and elevated poverty levels in the AA. FDSB's lending to low- and moderate-income borrowers was less than the percentage of low- and moderate-income families in the AA and less than peer, but is nevertheless considered reasonable.

FDSB's competition in the AA is significant and management operates with 1.9 percent of the deposit market share. More importantly, the average median housing value in the MSA has increased from approximately \$229,356 in 2019 to \$283,876 in 2021 according to recent reports from the National Association of Realtors. Not only is affordability an issue, but so is availability of housing units.

A low-income family earning \$35,562 could qualify for a \$88,200 property, assuming a maximum mortgage payment of \$790 per month amortizing a 95 percent loan of \$83,700. A search of the web site Realtor.com found only four units available at that price in April 2022. A moderate-income family with income of \$48,899 could afford a \$166,900 home, which was still significantly less than the median housing value of \$275,000. According to the Realtor.com web site in April 2022, there were 16 homes with prices ranging from approximately \$127,000 to \$167,000. Even when available, homes that are listed well below the average median housing value in the AA often require significant improvements before they are habitable.

In addition to the lack of affordable homes in the AA, cost-burdened renters are unable to save for the down payment required to purchase a residence. Approximately 12.3 percent of renters in low-income CTs and 38.8 percent of renters in moderate-income CTs have rental costs greater than 30 percent of their income. Furthermore, approximately 12.8 percent of families in low-income CTs and nearly 37 percent of families in moderate-income CTs live below the poverty line. All these factors make lending difficult for low- and moderate-income families in the AA.

Responses to Complaints

There were no complaints related to FDSB's CRA performance during the evaluation period.

CD TEST

FDSB's performance under the CD Test in the state of Louisiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of CD Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate FDSB's level of CD lending.

Community Development Loans				
AA:	#	% of Total #	\$(000's)	% of Total \$
New Orleans AA	1	100	1,281	100

The level of CD lending demonstrates adequate responsiveness to the CD needs in the AA, which had a positive impact on the Lending Test performance in the AA.

While FDSB is primarily a single-family residential lender and therefore does not routinely originate commercial or loans to small businesses, during the review period FDSB made one PPP loan for \$1.3 million to a local high school. While the high school is outside the bank's AA, CD credit is nevertheless assessed due to the unusual circumstances surrounding the COVID-19 pandemic. The

PPP loan allowed the school to maintain and employ 112 employees throughout the greater New Orleans metropolitan area.

Number and Amount of Qualified Investments

Qualified Investments										
AA:	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portions of New Orleans MSA	3	1,195	4	5,072	7	100	6,267	100	0	0

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

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

FDSB demonstrates excellent responsiveness to the needs of the AA through CD investments, considering FDSB's capacity and the need and availability of such opportunities for CD in the AA. FDSB provided the following investments in the AA during the review period:

- Invested \$526,157 in one prior period CRA mortgage pool where a majority of the apartment units were rented to LMI borrowers.
- Invested \$668,718 in two prior period Small Business Administration (SBA) participation pools when the loans were made to SBA-qualified entities.
- Invested \$3,010,000 in a mortgage pool where 97.2 percent of the apartment units are under 50 percent of the median income; therefore, easily rented to low-income borrowers.
- Invested \$2,061,872 in three SBA participation pools when the loans were made to SBA qualified entities.
- Contributed \$149,458 to various charities and organizations who promote community and targeted economic development.

Extent to Which the Bank Provides CD Services

FDSB has provided an excellent level of CD services. FDSB has seven locations, of which two are in moderate-income CTs and four additional branches are adjacent to one LMI CT. FDSB's service delivery systems are accessible to all geographies and individuals of different income levels. Business hours are convenient to all segments of the AA and all offices have expanded hours on Friday afternoons. Five of the seven ATMs can accept deposits. FDSB is a member of the PULSE, PLUS, and AllPoint ATM networks, which gives customers access to 55,000 surcharge-free ATMs worldwide. Customers may access their accounts through online/mobile banking with mobile deposit and bill payment.

FDSB's branches offer a full line of banking services. The majority of checking account products offered (four of five) have no monthly service charge. Additionally, the minimum opening deposit required for both checking and savings account is \$50, making these products readily accessible to low- and moderate- income individuals. In addition to low-cost checking and savings products, FDSB offers free online banking, telephone banking, and toll-free customer service. Lending

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

products offered include mortgage loans, construction loans, lot loans, and HELOCs. Additionally, FDSB continues to offer its Advantage Plus Program, a program designed to assist LMI borrowers in the purchase of their first home.

FDSB's management and employees participated in a total of 30 services designed to stabilize communities and improve the quality of life in the AA. These services focused on the needs of LMI groups. Such activity enables FDSB to become aware of and participate in activities that satisfy the CD needs of the AA. Highlights of the various services include the following:

- During the COVID-19 pandemic, FDSB offered loan payment deferrals to borrowers by request. In the first round of deferrals, 233 borrowers were approved to defer their loan payments for up to three months. In the second round of deferrals, 55 customers were approved to defer their loans for up to an additional three months. In the third round of deferrals, 7 borrowers were approved to defer their loans payments for up to another three months.
- FDSB launched a partnership with the Finance Institute of Delgado Community College in the fall of 2019. This program helps students develop the skills and knowledge needed to enter a career in banking.
- FDSB assisted the New Orleans Mission (NOM) and the Ozanam Inn in receiving Affordable Housing Program grants from the Federal Home Loan Bank. The NOM (a 30,000 square foot facility) houses 300 men and women struggling with homelessness and addiction. In November of 2019, the NOM was awarded \$587,250 to assist in the final phase of its renovation. The Ozanam Inn is a non-profit that serves the homeless and underserved of the greater New Orleans area. The Ozanam Inn was awarded a \$750,000 grant to assist with relocating its shelter.
- FDSB has partnered with Second Harvest Food Bank on several occasions. Second Harvest leads the fight against hunger in south Louisiana by providing food access, advocacy, education, and disaster response. Since the previous PE, FDSB has collected 388 pounds of non-perishable food items that were donated to the food bank. In April of 2019, seven bank employees volunteered to pack and sort food items at Second Harvest Food Bank that were then distributed throughout south Louisiana.
- FDSB participated in several activities to assist LMI children in the bank's AA: Chalk It Up School Supply; Adopt-a-Family School Uniform Drive; Hands on Stem Day; Edna Karr Career Day; The Salvation Army's Adopt-a-Family Christmas Wish List; Volunteers of America's housing program for the homeless; Marine Corps Toys for Tots; and the Lions Eye Club "used eyeglass drive" (for the benefit of all ages, including children). Additionally, FDSB participated in St. Michael's Special School Joy Center, which employs adults with disabilities.
- FDSB and its employees participate in multiple walks to raise awareness and funds for several non-profit organizations; American Cancer Society, the Kidney Foundation of LA; and Autism Speaks.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	-Home mortgage -CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of AAs and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MSA		
New Orleans	Full-Scope	Analyzed PPP loans – Not primary product
State		
Louisiana	Full-Scope	Analyzed PPP loans – Not primary product

Appendix B: Summary of MSA and State Ratings

RATINGS FOR FIFTH DISTRICT SAVINGS BANK			
Overall Bank	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
State of Louisiana	Satisfactory	Outstanding	Outstanding

(*) The Lending Test and CD 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/AA.

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. CTs 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.

CD: Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies, distressed or underserved non-metropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MSAs, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the multistate MSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table O. AA Distribution of Home Mortgage Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. AA Distribution of Home Mortgage Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each multistate MSA/AA. The table also presents aggregate peer data for the years the data is available.

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21	
AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
New Orleans AA	426	117,341	100.0	26,494	2.3	1.6	1.1	14.8	8.2	10.2	39.4	26.1	32.1	43.2	62.0	56.1	0.3	2.1	0.5		
Total	426	117,341	100.0	26,494	2.3	1.6	1.1	14.8	8.2	10.2	39.4	26.1	32.1	43.2	62.0	56.1	0.3	2.1	0.5		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21	
AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
New Orleans AA	426	117,341	100.0	26,494	21.0	2.3	3.5	15.1	8.9	12.2	17.8	15.5	17.5	46.1	71.8	47.2	0.0	1.4	19.6		
Total	426	117,341	100.0	26,494	21.0	2.3	3.5	15.1	8.9	12.2	17.8	15.5	17.5	46.1	71.8	47.2	0.0	1.4	19.6		

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*