

PUBLIC DISCLOSURE

June 3, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankPlus
Certificate Number: 5903

202 East Jackson Street
Belzoni, Mississippi 39038

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Dallas Regional Office

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The Lending Test is rated High Satisfactory.

- Lending levels reflect excellent responsiveness to assessment areas' credit needs.
- A high percentage of loans are made in the institutions assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes.
- The institution makes use of innovative or flexible lending practices in order to serve assessment area credit needs.
- The bank made a leader level of community development (CD) loans.
- The institution exhibits excellent responsiveness of serving the credit needs of the most economically disadvantaged areas of its assessment areas, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices

The Investment Test is rated Outstanding.

- The bank has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and CD needs.
- The institution does not use innovative and/or complex investments to support CD initiatives.

The Service Test is rated Low Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas.
- To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its retail delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals.
- Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies or individuals.
- The institution has an adequate level in providing CD services.

DESCRIPTION OF INSTITUTION

BankPlus operates as a state-chartered retail commercial bank headquartered in Belzoni, Mississippi. BancPlus Corporation, Ridgeland, Mississippi, a one-bank holding company, wholly owns the subject bank, as well as additional subsidiaries and affiliates that provide investment and financial services. This evaluation does not consider any affiliate or subsidiary activities. The bank received an "Outstanding" rating at its previous FDIC CRA Evaluation dated March 22, 2021, using Large Bank Examination Procedures.

BankPlus acquired First Bank and Trust, New Orleans, Louisiana with the acquisition effective March 1, 2022, resulting in the States of Florida and Louisiana as new rated areas since the last CRA evaluation. The bank opened 21 new branches and closed 18 branches, including 3 branch relocations, during the evaluation.

The bank operates 82 full-service offices and 119 Automated Teller Machines (ATMs) and Interactive Teller Machines (ITM) located throughout Alabama, Florida, Louisiana, and Mississippi. BankPlus' primary business focus is home mortgage and commercial lending. BankPlus offers a full line of loan products, deposit accounts, and other financial services. It also offers hours and days of service consistent with area and industry norms.

As of March 31, 2024, assets totaled \$7.8 billion, consisting primarily of net loans and leases of \$6.0 billion and securities of \$942.7 million. Total deposits equaled \$6.7 billion as of the same date. Since the previous evaluation, total assets increased 57.7 percent, net loans increased 77.4 percent, and total deposits increased 49.1 percent. As reflected in the following table, the bank's major loan products show commercial, 1-4 family and multifamily residential loans, and construction loans.

Loan Portfolio Distribution as of 3/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	672,113	11.1
Secured by Farmland	309,319	5.1
Secured by 1-4 Family Residential Properties	1,593,156	26.2
Secured by Multifamily (5 or more) Residential Properties	426,017	7.0
Secured by Nonfarm Nonresidential Properties	2,267,405	37.3
Total Real Estate Loans	5,268,010	86.8
Commercial and Industrial Loans	613,577	10.1
Agricultural Production and Other Loans to Farmers	88,290	1.5
Consumer Loans	94,987	1.6
Obligations of State and Political Subdivisions in the U.S.	3,065	0.0
Other Loans	10,068	0.2
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	5,519	0.1
Total Loans	6,072,478	100.0
<i>Source: Reports of Condition and Income; Due to rounding, totals may not equal 100.0 percent</i>		

Based on the information discussed in this section as well as other regulatory data, the institution's financial condition and constraints, size, product offerings, prior performance, and status of any legal impediments did not affect its ability to meet the assessment areas' credit needs.

DESCRIPTION OF ASSESSMENT AREAS

For this evaluation, BankPlus operates in four rated areas which include Alabama, Florida, Louisiana, and Mississippi. The bank currently has four assessment areas in Alabama, one in Florida, five in Louisiana, and four in Mississippi. Please refer to the rated areas and individual assessment areas for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated March 22, 2021, to the current evaluation dated June 3, 2024. To assess performance, examiners applied the Federal Financial Institutions Examination Council (FFIEC) Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. The appendices list the applicable tests' criteria.

Examiners reviewed all four rated areas. While the bank had operations in Alabama and Louisiana at the previous evaluation, examiners did not review activity in these rated areas at the prior evaluation; therefore, this will be the first evaluation that reviews activities in these rated areas. Additionally, due to the acquisition, this will be the first evaluation that reviews the new

rated area, in Florida. Please refer to the rated area sections for additional details regarding which assessment areas examiners evaluated within each rated area using full-scope procedures and limited-scope procedures.

The following table shows that the bank originated a majority of its loans, deposits, and branches in Mississippi. Consequently, examiners weighed records in Mississippi heaviest when arriving at applicable conclusions and ratings.

Rated Area Breakdown of Loans, Deposits, and Branches						
Rated Area	Loans		Deposits*		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Alabama	109,043	4.1	334,542	5.8	7	8.5
Florida	67,622	2.5	35,058	0.6	1	1.2
Louisiana	579,118	21.7	1,034,746	17.8	17	20.7
Mississippi	1,908,222	71.6	4,412,262	75.9	57	69.5
Total	2,664,005	100.0	5,816,608	100.0	82	100.0
<i>Source: 2021-2023 Home Mortgage Disclosure (HMDA) Reported Data; 2021-2023 CRA Reported Data; FDIC Summary of Deposits (6/30/2023); * Active full-service branches only as of the CRA evaluation date as BankPlus closed branches after the FDIC Summary of Deposits (6/30/2023); Due to rounding, totals may not equal 100.0 percent</i>						

Activities Reviewed

For the Lending Test, CRA Large Bank procedures require examiners to consider a bank's reported home mortgage, small business, and small farm loans since the previous evaluation, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the assessment areas) either according to the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans (Total loans reported inside and outside of the assessment areas)

- 2021: 3,096 loans totaling \$707,648,000
- 2022: 3,046 loans totaling \$917,163,000
- 2023: 2,556 loans totaling \$665,580,000

Small Business Loans (Total loans reported inside and outside of the assessment areas)

- 2021: 4,536 loans totaling \$309,770,000 (includes PPP loans)
- 2022: 2,038 loans totaling \$293,923,000
- 2023: 2,201 loans totaling \$298,483,000

Small Farm Loans (Total loans reported inside and outside of the assessment areas)

- 2021: 826 loans totaling \$62,167,000
- 2022: 688 loans totaling \$69,451,000
- 2023: 702 loans totaling \$65,353,000

CD Loans:

January 1, 2021 – December 31, 2023: 244 loans totaling \$515,809,000

This evaluation does not consider any affiliate lending. Examiners analyzed the universe of home mortgage, small business, and small farm loans since it represents a majority of the bank's loans by dollar volume. However, based on an analysis of the data above by rated area, small farm loans are a major loan product only for the State of Mississippi, with the exception of the Biloxi Metropolitan Statistical Area (MSA) assessment area. Examiners also analyzed small farm loans for the Assessment Area Concentration performance factor.

Since no trends exist between the different years' data that materially affect applicable conclusions or ratings, unless otherwise noted, this evaluation only presents the 2022 HMDA, small business, and small farm data, the most recent year for which aggregate data exists as of this evaluation date. However, examiners included 2021-2023 HMDA and CRA data in the Assessment Area Concentration discussion. Examiners compared the bank's HMDA lending to aggregate data in 2021 and 2022, as well as 2020 U.S. Census data in 2023. Examiners compared the bank's small business lending to aggregate data in 2021 and 2022, as well as D&B data in 2023.

Examiners considered the universes of loans reviewed by number and dollar volume, as well as management's stated business strategy, to determine the weighting applied to the loan categories reviewed. The weightings for the specific loan categories vary for each of the assessment areas. As suggested by the above figures, examiners generally gave more weight to home mortgage loans when arriving at applicable conclusions given the higher dollar volume of loans.

The scopes for the Investment and Service Tests consider applicable current period CD activities, including qualified investments and CD services. Current period activities involve those generated since the previous evaluation. The Investment Test's scope further encompasses all prior period qualified investments. Prior period qualified investments involves those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period qualified investments.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings/closings during the evaluation period. The review evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the assessment area(s).

Given the institution's method and compilation of CD data, examiners reviewed all CD loans, qualified investments, and CD services from January 1, 2021, to December 31, 2023.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BankPlus demonstrated a high satisfactory record for the bank as a whole regarding the Lending Test. The bank originated a high percentage of loans in the assessment areas, demonstrated good geographic distribution and borrower profile records, and made use of innovative and flexible lending practices to primarily support this conclusion. In addition, the bank demonstrated

excellent responsiveness to lending levels and a leader in making CD loans. Conclusions regarding the institution's overall lending performance were consistent with the lending performance for Mississippi. Conclusions regarding the institution's overall lending performance were inconsistent with the lending performance for Alabama, Florida, and Louisiana, below the level noted for the overall institution. The appendices list the Lending Test's criteria.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. Excellent records regarding home mortgage, small business, and small farm lending supports this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the assessment areas' credit needs when arriving at this conclusion.

Home Mortgage Loans

Excellent responsiveness to assessment area credit needs. Excellent performance in Florida, Louisiana, and Mississippi outweighed good performance in Alabama to support this conclusion.

Home mortgage lending levels combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 2,434 total reportable home mortgage loans totaling approximately \$695.6 million. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 1.7 percent market share of the total number and a 1.8 percent market share of the total dollar volume of home mortgage loans.

This volume of activity ranks the bank 11th out of 1,095 total lenders in the bank's assessment areas. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent responsiveness to assessment area credit needs. Excellent performance in Mississippi outweighed adequate performance in Alabama and Louisiana to support this conclusion.

For 2022, the bank originated 1,378 total reportable small business loans totaling nearly \$176.0 million inside its assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 1.0 percent market share of the total number and a 3.1 percent market share of the total dollar volume of small business loans.

This volume of activity ranks the bank 18th out of 228 total lenders in the bank's assessment areas. This ranking lands the bank in the top 7.9 percent of lenders reporting such loans in the bank's assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent responsiveness to assessment area credit needs. Excellent performance in Mississippi supports this conclusion.

For 2022, the bank originated 460 total reportable small farm loans totaling nearly \$42.3 million inside its assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 20.5 percent market share of the total number of small business loans and a 29.1 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 1st out of 49 total lenders in the bank's assessment areas. This ranking lands the bank at the top of lenders reporting such loans in the bank's assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Assessment Area Concentration

The institution originated a high percentage of loans inside its assessment areas for the institution as a whole. High percentages of home mortgage, small business, and small farm loans originated in the assessment areas support this conclusion. Examiners considered the bank's asset size and office structure as well as the loan categories reviewed relative to the areas' combined size and economy when arriving at this conclusion.

Home Mortgage Loans

The institution originated a high percentage of home mortgage loans inside its assessment areas. The following table shows that, for home mortgage loans by both measures, the percentages of the number and dollar volume, the bank originated a high percentage inside its assessment areas.

Small Business Loans

The institution originated a high percentage of small business loans inside its assessment areas. The following table shows that, for small business loans by both measures, the percentages of the number and dollar volume, the bank originated a high percentage inside its assessment areas.

Small Farm Loans

The institution originated a high percentage of small farm loans inside its assessment areas. The following table shows that, for small farm loans the percentage of the number demonstrated a high percentage of loans, and the percentage of the dollar volume demonstrated an adequate percentage of loans. Considering both number and dollar amount, the bank originated a high percentage inside its assessment areas.

Lending Inside and Outside of the Assessment Area										
	Number of Loans					Dollar Amount of Loans \$(000s)				
Loan Category	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2021	2,780	89.8	316	10.2	3,096	615,522	87.0	92,126	13.0	707,648
2022	2,373	77.9	673	22.1	3,046	640,224	69.8	276,939	30.2	917,163
2023	2,099	82.1	457	17.9	2,556	518,485	77.9	147,095	22.1	665,580
Subtotal	7,252	83.4	1,446	16.6	8,698	1,774,231	77.4	516,160	22.6	2,290,391
Small Business										
2021	3,890	85.8	646	14.2	4,536	254,132	82.0	55,638	18.0	309,770
2022	1,784	87.5	254	12.5	2,038	243,634	82.9	50,289	17.1	293,923
2023	1,924	87.4	277	12.6	2,201	247,644	83.0	50,839	17.0	298,483
Subtotal	7,598	86.6	1,177	13.4	8,775	745,410	82.6	156,766	17.4	902,176
Small Farm										
2021	656	79.4	170	20.6	826	46,689	75.1	15,478	24.9	62,167
2022	532	77.3	156	22.7	688	50,661	72.9	18,790	27.1	69,451
2023	527	75.1	175	24.9	702	47,013	71.9	18,340	28.1	65,353
Subtotal	1,715	77.4	501	22.6	2,216	144,363	73.3	52,608	26.7	196,971
Total	16,565	84.1	3,124	15.9	19,689	2,664,004	78.6	725,534	21.4	3,389,538
Source: HMDA Reported Data; CRA Reported Data;. Due to rounding, totals may not equal 100.0 percent										

Geographic Distribution

Overall, the geographic distribution of loans reflects good penetration throughout the rated areas for the bank as a whole. Performance in Mississippi proved consistent with the overall conclusion. Performance in Alabama, Florida, and Louisiana proved inconsistent, falling below the overall conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts when arriving at conclusions for this performance factor. Refer to the rated area and assessment area sections for a complete discussion of the geographic distribution.

Borrower Profile

Overall, the distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes for the bank as a whole. Performance in Mississippi proved consistent with the overall conclusion. Performance in Alabama, Florida, and Louisiana proved inconsistent, falling below the overall conclusion. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses and farms gross annual revenue of \$1 million or less when arriving at conclusions for this performance factor. Refer to the rated area and assessment area sections for a complete discussion of the borrower profile.

Innovative or Flexible Lending Practices

The institution makes use of innovative or flexible lending practices for the bank as a whole in order to serve assessment area credit needs. The number and dollar volume of innovative loan products and flexible lending practices augmented by the bank's lending responsiveness to credit needs during the Coronavirus (COVID-19) Pandemic supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion.

The tables below show that, since the previous evaluation, the bank originated 5,352 innovative or flexible loans totaling \$119.8 million. This dollar figure equates to 1.8 percent of average total assets of \$6.5 billion since the previous evaluation and 2.4 percent of average net loans of \$5.0 billion for the same period, thereby reflecting an adequate level.

As the table illustrates, the bank's small dollar consumer loan program, CreditPlus, offers several products with flexible terms and criteria. The bank promotes the CreditPlus program in its outreach efforts to expand access to the unbanked or underbanked through greater awareness of the product's availability. The program requires completion of a financial literacy course to qualify for the loan component. Other small dollar consumer loans offer loan amounts of \$2,500 or less, which can help meet consumer needs for emergency funds due to unforeseen circumstances.

The Affordable Housing Program (AHP) provides flexible loan terms by loan applicants receiving grant funds through the Federal Home Loan Bank of Dallas (FHLB) for down payment or closing costs assistance. The Home Ownership Stabilization Program (HOSP) helps BankPlus customers avoid foreclosure through flexible loan terms and lower interest rates for low- and moderate-income borrowers.

As the table illustrates, a portion of the bank's flexible home mortgage loan products consist of loans granted through government programs, such as the Federal Housing Administration (FHA), Veterans Administration (VA) and United States Department of Agriculture (USDA).

The bank also offers various small business and farm financing through Small Business Administration (SBA), other federal government, and state government programs with flexible features to help small businesses and farms obtain financing and small dollar loans that they may not have otherwise been eligible through normal lending channels. Examples of flexible features for these loan programs include higher guaranties, lower down payments, and no repayment for the first year of the loan.

Given the bank's capacity and the needs in its assessment areas, the level of innovative and flexible lending reflects adequate responsiveness to the credit needs of its assessment areas. The table below displays the bank's innovative or flexible loans by rated area.

Innovative or Flexible Lending Programs Institution										
Rated Area	Credit Plus/ Other Small Dollar Loans		AHP/HOSP		FHA/USDA/VA		SBA/SBB/FSA/ MS and USDA Small Business Programs		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama	69	98	0	0	17	5,532	4	6,904	90	12,534
Florida	0	0	0	0	5	2,850	0	0	5	2,850
Louisiana	128	163	9	1,493	27	6,704	2	6,767	166	15,127
Mississippi	4,814	6,035	50	5,232	166	35,259	61	42,722	5,091	89,248
Total	5,011	6,296	59	6,725	215	50,345	67	56,393	5,352	119,759
<i>Source: Bank Data</i>										

Though not reflected in the prior table, examiners noted the following additional bank activity as it relates to the COVID-19 Pandemic.

COVID-19 Pandemic Lending Activities – The bank received favorable CRA consideration for its willingness to offer various flexible options for borrowers impacted financially by the COVID-19 pandemic. The bank assisted small business borrowers with Paycheck Protection Program (PPP) loans through the SBA. The SBA offered the PPP to provide a direct incentive for small businesses to keep their workers on the payroll. The bank originated 3,461 PPP loans totaling approximately \$152.0 million during the evaluation period. In addition, the bank offered various payment deferment options to its commercial and consumer loan customers during the evaluation period and provided 1,213 payment deferrals, extensions, and payment modifications totaling over \$416.0 million for customers impacted financially by the pandemic. This total excludes loans that paid out during the evaluation period. Fees waived on loan extensions included the loan extension fee and, after March 16, 2020, late charges.

The bank's grant programs through various federal and city government entities, particularly the FHLB, provides grants to individuals, small businesses, and community-based organizations totaling over \$2.4 million using programs, such as: AHP, Special Needs Assistance Program (SNAP), Partnership Grant Program (PGP), Capital Magnet Fund, and an economic development/disaster grant program. Of the \$2.4 million total grant amount, BankPlus contributed its own funds of \$30,600. The AHP grants provide down payment and closing cost assistance to individuals and organizations. For SNAP and PGP grant programs, the FHLB provides matching funds to the bank's funds up to a dollar limit.

The level of the bank's innovative and flexible loan programs declined since the prior evaluation, which reported 9,147 innovative or flexible loans totaling \$147.2 million. However, the level of innovative or flexible loan programs at the current evaluation remained good when considering the dollar volume.

Community Development Loans

The institution is a leader in making CD loans for the bank as a whole. BankPlus's excellent level of CD loans and its excellent responsiveness to CD needs support this conclusion. The bank demonstrated inconsistent performance in Alabama, Florida, Louisiana, and Mississippi, where

performances fell below the overall institution level.

Regarding the overall level of CD loans, the following table shows that, since the previous evaluation the bank granted 244 CD loans totaling over \$515.8 million. This level equates to 7.9 percent of average total assets of \$6.5 billion since the previous evaluation and 10.3 percent of average net loans of \$5.0 billion for the same period, thereby reflecting leader levels. These levels reflect an increase from the 7.0 percent of average total assets and a relatively stable percentage to the 10.1 percent of average net loans reported at the previous evaluation.

Community Development Lending Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	12	10,420	1	5,750	22	100,670	45	98,783	80	215,623
2022	23	32,175	5	14,639	21	66,868	49	75,762	98	189,444
2023	14	26,962	2	4,633	15	25,695	35	53,452	66	110,742
Total	49	69,557	8	25,022	58	193,233	129	227,997	244	515,809
<i>Source: Bank Data</i>										

In addition to reflecting a leader level of CD loans, the CD loans reflect excellent responsiveness to the assessment areas' CD needs. As seen in the previous table, 37.5 percent of the dollar volume of all CD loans promotes economic development, and 44.2 percent help to revitalize or stabilize low- and moderate-income geographies. Additionally, 4.9 percent benefits community services for low- and moderate-income individuals and 13.5 percent promotes affordable housing.

As noted under the applicable Description of Institution's Operations sections, activities that revitalize or stabilize qualifying geographies reflect a primary CD need in the assessment areas. In addition, activities that provide affordable housing, support community services for low- and moderate-income individuals, and promote economic development by financing small businesses or farms also represent CD needs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its assessment areas, the bank exhibits a leader level in originating CD loans.

Community Development Loans By Rated Area Institution										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama	0	0	1	3,033	14	21,965	5	12,381	20	37,379
Florida	1	4,972	0	0	0	0	0	0	1	4,972
Louisiana	28	53,470	1	1,600	11	50,729	6	32,302	46	138,101
Mississippi	20	11,115	3	4,281	31	105,169	118	183,314	172	303,879
Regional Activities	0	0	3	16,108	2	15,370	0	0	5	31,478
Total	49	69,557	8	25,022	58	193,233	129	227,997	244	515,809
<i>Source: Bank Data</i>										

The following are notable examples of the bank's regional CD activities.

- ***Community Service*** – The bank originated 3 loans for \$16.1 million to a wireless service provider to increase internet speed and capacity to rural and other areas to enhance access to banking, social services, healthcare, and educational activities, primarily benefiting low- and moderate-income individuals located in the Delta Region, Gulf Region, and central Mississippi as well as Alabama. The wireless service provider also participates in a government income-based program to help low- and moderate-income individuals obtain a phone.
- ***Economic Development*** – The bank originated 2 SBA PPP loans with \$15.4 million funding small business restaurant franchises located in 2 states (Alabama and Florida) during the pandemic for the businesses to continue paying employees and operating expenses.

INVESTMENT TEST

BankPlus demonstrated an outstanding record for the bank as a whole regarding the Investment Test. The excellent level of qualified investments combined with the excellent responsiveness to CD needs outweighed no use of complex investments to support this conclusion. Conclusions regarding the institution's overall Investment Test performance proved inconsistent in Alabama, Florida, Louisiana, and Mississippi, where performance fell below the overall level. The appendices list the criteria considered under this test.

Investment and Grant Activity

The investment activity for the bank as a whole reflects an excellent level. As seen in the following table, the bank made use of 826 qualified investments totaling approximately \$321.2 million. The total dollar amount equates to 4.9 percent of average total assets of \$6.5 billion since the previous evaluation and 43.2 percent of average securities of \$742.4 million for the same period, thereby reflecting an excellent level. The bank's investments for the current evaluation period compare favorably to similarly situated institutions. These levels reflect a significant increase over the 1.3 percent of average total assets and the 9.9 percent of average securities reported in the previous evaluation.

Qualified Investments by Rated Area Institution										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama	6	268	50	96	5	12	2	5	63	381
Florida	2	6	5	25	0	0	0	0	7	31
Louisiana	20	7,611	64	726	5	17	3	15	92	8,369
Mississippi	48	2,837	454	20,204	96	20,920	11	89	609	44,050
Regional Activities	23	104,780	0	0	29	163,076	3	511	55	268,367
Total	99	115,502	573	21,051	135	184,025	19	620	826	321,198
<i>Source: Bank Data; Total number of investments in rated areas include single investments benefiting multiple rated areas</i>										

The following illustrates a notable example of the bank's regional qualified investment activities:

- ***Affordable Housing*** –The bank invested \$102.8 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

BankPlus shows excellent responsiveness to credit and CD needs using qualified investments that directly address identified needs in the rated areas where the bank operates. The above table shows responsiveness to a variety of CD needs as illustrated by the dollar amount in all four CD purpose categories. In addition, the bank demonstrates responsiveness through the higher dollar amounts within affordable housing and economic development.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record for the bank as a whole regarding the Service Test. The reasonably accessible delivery systems to essentially all portions of the bank's assessment areas, the changes in branch locations has generally not adversely affected the accessibility of its delivery systems, the services do not vary in a way that inconveniences portions of the assessment areas, and adequate levels regarding the institution's CD services support this conclusion. The Service Test performance is consistent in Alabama, Louisiana, and Mississippi, but inconsistent for Florida where the performance was below the overall level.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas for the bank as a whole. Reasonably accessible branch distribution and reasonably accessible alternative delivery systems support this conclusion.

The bank makes its full-service offices reasonably accessible to essentially all portions of the institution's assessment areas for the bank as a whole. Adequate accessibility of branches in low- and moderate-income geographies supports this conclusion.

The bank's branch distribution in low-income census tracts rises 5.0 percentage points above the population in low-income census tracts, reflecting an adequate level. The bank's branch distribution rises 6.3 percentage points above the population percentage in moderate-income census tracts, also reflecting an adequate level.

Branch and ATM Distribution by Geography Income Level Institution												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open* Branches		Closed* Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	151	10.6	414,585	8.4	11	13.4	13	10.9	2	9.5	2	11.1
Moderate	323	22.7	1,012,694	20.5	22	26.8	28	23.5	4	19.0	3	16.7
Middle	452	31.8	1,717,581	34.7	17	20.7	25	21.0	2	9.5	4	22.2
Upper	451	31.7	1,739,390	35.2	32	39.0	53	44.5	13	61.9	9	50.0
NA	44	3.1	60,600	1.2	0	0.0	0	0.0	0	0.0	0	0.0
Totals	1,421	100.0	4,944,850	100.0	82	100.0	119	100.0	21	100.0	18	100.0
Source: 2020 U.S. Census Data; Bank Data; Due to rounding, totals may not equal 100.0 percent												
*Includes three branch relocations												

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the bank's assessment areas for the bank as a whole. Reasonably accessible ATMs/ITMs and adequate digital channel alternative delivery systems to low- and moderate-income census tracts support this conclusion. These alternative delivery systems remain consistent throughout all assessment areas.

BankPlus operates 119 ATMs/ITMs, of these, 89 or 74.8 percent are full-service (deposit taking and cash dispensing). The preceding table shows that the bank's ATMs/ITMs in low-income census tracts rises 2.5 percentage points above the population in low-income census tracts, thereby reflecting an adequate level. The bank's ATMs/ITMs in moderate-income census tracts rises 3.0 percentage points above the population in moderate-income census tracts, also reflecting an adequate level.

In addition, the 39 ITMs, whether at branches or standalone machines, provide video remote banker access to a live person on video screen for extended hours of operation during weeknights and Saturdays. Personal account customers can conduct transaction types at ITMs, including making cash and check deposits, withdrawals, account transfers, and check cashing. Business account customers can do simple transactions using video tellers at ITMs. Outside of ITM hours, the ITM functions as an ATM machine. Loan services are currently limited to loan payments at ITMs.

The following digital delivery systems are available to individuals and small business customers

for access to retail banking services remotely at any time. The range of retail banking services through digital delivery systems as noted in the below bullet points provides responsiveness to the bank's assessment areas, including low- and moderate-income individuals. The range of retail banking services through digital delivery systems for online loan applications is limited to online mortgage applications as of the CRA evaluation date. Online non-mortgage loan applications could provide greater ease of access by a quicker process to submit a loan application. By reducing time in receiving the loan application, individuals would have faster access to loan funds.

- **Personal Online Banking, Mobile Banking and Mobile Deposit** – This digital delivery system provides the following as primary features:
 - Money Management Guidance and Tools: Fraud and transaction alerts; external account and debt connection to track spending transactions, balances, and debts in one place, and tools for budgeting categories and for tracking financial goals.
 - Digital Transactions: Person-to-person payments in near real time through Zelle, card controls, mobile check deposit, bill pay, text banking, and online deposit account opening.
- **Business Online Banking, Mobile Banking and Mobile Deposit** – This digital delivery system provides the following as primary features: balances & transaction activity, mobile check deposit, loan payment and transaction alerts, bill pay, account software connectivity, and secure digital payment link to receive customer payments directly into a deposit account.
- **Debit Card and Mobile Wallets** – Cards are instantly issued and can be used immediately. Debit cards can be used for secure payments through mobile wallets, integrated with Apple Pay, Google Pay, Samsung Pay, Fitbit Pay, and Garmin Pay.
- **Online Mortgage Applications, Secure Document Upload** – Apply online through an electronic device for a home purchase or home refinancing loan. This service includes the capability to upload financial documents through a secure portal.
- **Self Service Payment Options** – Choices available for payment options include pay from a BankPlus account, pay by automatic transaction from another bank/credit union, pay using bill payment, or automated phone system. The bank charges nominal fees for self-service payments via text or through automated phone system.
- **Automated Savings by Round Up Feature** – The Savings Made Simple free service after enrollment lets customers round up the amount from any debit card purchase to the next whole dollar amount and automatically transfer that amount to a BankPlus savings account.
- **Account Information and Transfer Funds by Toll-Free Phone Number** – A computerized telephone answering system allows customers to obtain 24-hour deposit account information, transfer funds between accounts, determine the last items to clear their account, and order checks. The bank provides this service in English only.

- **Financial Literacy App** – This mobile app integrates financial education into the bank’s mobile banking application on iPhone smartphones, iPads, or Apple Watches. The app contains some educational content found in CreditPlus seminars, financial calculators, and alerts. This app helps anyone build and maintain a healthy financial status by giving them practical advice anytime and anywhere.

The following digital delivery system is available to individuals and small business customers for access to retail banking services through contact with a live agent:

- **Web Chat to a Live Agent** – Representatives remain available from 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 4:00 p.m. on Saturday.

Online banking is adequately effective in providing access to banking services to low- and moderate-income census tracts during the evaluation period for the bank as a whole. This access to banking services proved essential during the pandemic’s effect on bank accessibility. BankPlus provided internal statistics to support this data compared to 2020 U.S. Census data.

- The percentage of all active online banking users in low- and moderate-income census tracts at 24.6 percent compares reasonable to the population percentage in low- and moderate-income census tracts for the bank as a whole at 28.9 percent.

The following in person alternative delivery systems expand access to banking services to individuals and small business customers in non-English languages:

- **Bilingual and Translation Services** – Bilingual employees in branches located in low- and moderate-income census tracts provide assistance where needed to inform customers speaking different languages about digital features that make banking easier. This is particularly beneficial in Louisiana where individuals speak a number of different languages.

BankPlus did not introduce any new products with a focus on affordability to low- and moderate-income people since the previous evaluation.

BankPlus continues to offer two other affordable and safe consumer deposit accounts with a minimum opening balance of \$100 or less and no minimum balance. Low-cost features include no monthly maintenance fee charged on one account and no monthly maintenance fee charged on the other account with a monthly e-statement.

BankPlus continues to offer one affordable and safe commercial deposit account with a minimum opening balance of \$50 and no minimum balance.

The bank continues to offer consumer secured credit cards with 17 accounts opened during the 36-month review period, with a 0.5 percent account opening rate per month in the review period. This product helps individuals with credit building for those without credit histories or those with adverse banking histories. The secure credit card product is not marketed on the bank’s website.

Last, in response to the COVID-19 pandemic, the bank implemented several relief efforts including participating in the SBA's PPP loan program and deferring loan payments.

Changes in Branch Locations

The institution's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals for the bank as a whole.

The bank increased its total full-service branch presence by a net of 3 offices, with 21 branches opened and 18 branches closed. Of the branch openings, two occurred in low-income census tracts and four occurred in moderate-income tracts. Of the branch closings, two occurred in low-income census tracts and three occurred in moderate-income census tracts. The net impact of branch openings and closings in low- and moderate-income census tracts, resulting in one additional branch in a moderate-income census tract.

Of the five branch closings in low- and moderate-income census tracts (four in Mississippi and one in Louisiana), the bank installed an ITM at one location in rural Mississippi. The bank considers many factors in deciding on whether to close a branch and/or replace with alternative delivery systems, such as ITMs and other digital channels.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies or individuals, for the bank as a whole. The bank's branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly based on the areas' needs.

The institution maintains reasonable hours relative to the areas served and the industry. Most locations operate at least seven lobby hours Monday thru Friday. Approximately 35.4 percent (total 29 of 82 branches; 27 in Mississippi and 2 in Alabama) of the bank's locations have 7:00 a.m. to 7:00 p.m. drive-up hours Monday through Friday, in addition to Saturday drive-up hours. ITMs extend weekday and Saturday hours at low-income and moderate-income census tracts with these machines. See the individual discussion of assessment areas' sections for additional details on specific service hours offered in each assessment area.

The bank's Pickens, Mississippi branch operates with the addition of an ITM since the last CRA evaluation, with the benefits to the community mentioned above such as extended hours and the ability to communicate with remote bankers on digital screens.

Community Development Services

The institution providing an adequate level of CD services for the bank as a whole. Adequate performance regarding the extent of CD services outweighed good responsiveness of CD services to available opportunities support this conclusion.

The following table shows that the bank provided 387 CD services since the previous evaluation. This number equates to an average of 1.5 CD services, per office, per year, since the previous evaluation, thereby reflecting an adequate level. The bank averaged 95 full-service offices for the 2.7 years on average since the previous evaluation. The average figure reflects a decrease from the 559 CD services recorded at the prior evaluation. The current level reflects adequate performance regarding the extent, or number, of CD services provided.

Due to the COVID-19 pandemic, the bank suspended many in-person financial education classes. In response, BankPlus employees performed virtual classes through Microsoft Teams and Zoom to meet the financial literacy needs in 2021 to mid-year 2022.

The CD services demonstrate good responsiveness in addressing community needs, given the opportunities in the bank's significantly larger geographic rated area size since the last CRA evaluation. The qualitative impact of the services received favorable weight in elevating the bank's responsiveness resulting in good responsiveness of CD services.

BankPlus teaches financial literacy programs on a variety of financial topics to help adults, business owners, and youth understand financial options and improve their financial health. In particular, a number of CD services on financial education include a series of modules or lessons with real world scenarios to help further comprehension and implementation of the information into the attendee's daily lives, such as CreditPlus, BusinessPlus, and FDIC Money Smart courses. After attending some seminars, participants may be eligible to apply for banking products, including some products with flexible underwriting to help qualify.

BankPlus also provides technical assistance and processes grant applications through different FHLB grant programs to provide down payment, closing cost, or matching funds assistance to individuals and community partner organizations. Organizations have used these funds to finance programs helping address the most crucial CD purposes in all four rated areas, including disaster recovery, housing needs for the most impoverished low- and moderate-income areas, and educational programs to help at-risk youth learn different paths for a better life. Other financial institutions turned down some of these community organizations for financing requests before BankPlus worked with the organization to help them obtain financing.

As a certified Community Development Financial Institution (CDFI), BankPlus received Bank Enterprise Awards in 2021 and 2023 totaling \$608,049 for providing access to financial products and services to residents of distressed communities.

As a certified CDFI, BankPlus received an Equitable Recovery Award in 2023 totaling \$2,478,839 for providing to expand lending and investment activities in low- and moderate-income communities.

BankPlus continues the Banzai program to continue outreach efforts in the community through virtual, free financial literacy courses to students at 20 schools throughout the assessment areas where a majority of students qualify for free or reduced lunch. The modules cover financial topics relating to borrowing, budgeting, setting goals, spending, and building credit. Learners practice and develop healthy financial habits through real world scenarios and engaging educational

interactions.

Community Development Services by Year Institution					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021	19	31	4	2	56
2022	21	98	35	3	157
2023	23	128	17	6	174
Total	63	257	56	11	387
<i>Source: Bank Data (1/1/2021-12/31/2023)</i>					

The following table shows qualified investments by rated area and type.

Community Development Services by Rated Area Institution					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Alabama	0	3	0	2	5
Florida	0	0	0	0	0
Louisiana	9	21	10	1	41
Mississippi	40	200	31	0	271
Regional	14	33	15	8	70
Total	63	257	56	11	387
<i>Source: Bank Data (1/1/2021-12/31/2023)</i>					

The following lists examples of the bank's notable CD services in regional areas.

- **Community Service** – Employees provided 31 virtual financial education classes to individuals as part of the bank's small dollar loan program to encourage individuals to develop a regular savings plan. Approximately 80.0 percent of the individuals attending these financial education sessions are low- and moderate-income individuals. Small dollar loan programs are a less costly alternative to payday and other higher cost lenders. The financial education sessions covered multiple rated areas.
- **Economic Development** – Employees provided eight virtual or in-person financial education classes to small business owners to increase their knowledge of business finances, with some participants not having a previous business relationship with a bank. The program's goal is to improve the financial earnings of businesses to expand employment, including jobs for low- and moderate-income individuals. This financial education training educates the small business owner at the time of obtaining a short-term business loan. The financial education sessions covered multiple rated areas.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

ALABAMA

CRA RATING FOR LOUISIANA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

BankPlus designated four assessment areas in the State of Alabama as noted in the table below. All of the bank's assessment areas in Alabama conform to the CRA regulatory requirements.

Description Assessment Areas Alabama			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Alabama Non-MSA	Coffee	16	1
Dothan MSA	Genova and Houston	32	3
Huntsville MSA	Madison	95	1
Mobile MSA	Mobile	135	2
Source: Bank Data; 2020 U.S. Census Data			

SCOPE OF EVALUATION – ALABAMA

Of the four assessment areas in Alabama, examiners applied full-scope procedures to the Mobile MSA assessment area since it generated the largest percentage of the bank's loans in this rated area and has not been reviewed under full-scope procedures in prior evaluations. Examiners applied limited-scope procedures to the other Alabama assessment area. Major loan products in Alabama are home mortgage and small business loans.

Examiners considered the following loans granted inside the bank's Alabama assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:

- 2021: 93 loans totaling \$18,332,749
- 2022: 87 loans totaling \$17,724,118
- 2023: 106 loans totaling \$28,880,084

Small Business Loans:

- 2021: 155 loans totaling \$15,536,000
- 2022: 74 loans totaling \$15,872,000
- 2023: 72 loans totaling \$10,641,000

The weightings for the specific loan categories vary for each of the assessment areas. As suggested by the above figures, examiners generally gave more weight to home mortgage loans when arriving at applicable conclusions given the higher dollar volume of loans. For the Huntsville MSA, examiners gave more weight to small business loans when arriving at applicable conclusions given the higher dollar volume of loans.

The following table shows that the Mobile MSA assessment area generated the largest percentage of the bank's Alabama loans. Consequently, examiners weighed records in the Mobile MSA assessment area heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Alabama						
Assessment Area	Loans		Deposits *		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Alabama Non-MSA	22,565	20.7	32,800	9.8	1	14.3
Dothan MSA	31,607	29.0	188,819	56.4	3	42.9
Huntsville MSA	552	0.5	666	0.2	1	14.3
Mobile MSA	54,319	49.8	112,257	33.6	2	28.5
Total	109,043	100.0	334,542	100.0	7	100.0
<i>Source: 2021-2023 HMDA Reported Data; 2021-2023 CRA Reported Data; FDIC Summary of Deposits (6/30/2023); * Active full-service branches only as of the CRA evaluation date as BankPlus closed branches after the FDIC Summary of Deposits (6/30/2023); Due to rounding, totals may not equal 100.0 percent</i>						

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

BankPlus demonstrated a low satisfactory record in the State of Alabama regarding the Lending Test. Adequate performance records regarding geographic distribution and CD loans outweighed the poor borrower profile record primarily support this conclusion. The bank further made limited use of innovative and flexible lending levels and demonstrated good lending levels in this rated area. Conclusions regarding the institution's performance in the State of Alabama proved consistent in the Alabama Non-MSA, Huntsville MSA and Mobile MSA assessment areas and proved inconsistent in the Dothan MSA assessment area where performance rose above the rated area.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the State of Alabama. Good performance regarding home mortgage and adequate performance regarding small business loans support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to assessment area credit needs in the State of Alabama. For 2022, the bank originated 88 total reportable home mortgage loans totaling approximately \$18.2 million in its Alabama assessment areas. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 0.3 percent market share of the total number of home mortgage loans and 0.2 percent market share of the total dollar volume of home mortgage loans in the Alabama assessment areas.

This volume of activity ranks the bank 88th out of 576 total lenders in the bank's Alabama assessment areas. This ranking lands the bank in the top 15.3 percent of lenders reporting such loans in the bank's Alabama assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the State of Alabama. For 2022, the bank originated 59 total reportable small business loans totaling approximately \$12.8 million inside its Alabama assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 0.3 percent market share of the total number and a 1.1 percent market share of the total dollar volume of small business loans.

This volume of activity ranks the bank 45th out of 124 total lenders in the bank's Alabama assessment areas. This ranking lands the bank in the top 36.3 percent of lenders reporting such loans in the bank's Alabama assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the State of Alabama. The Mobile MSA assessment areas demonstrated consistent performance with the rated area. Performance in the Alabama Non-MSA and Dothan MSA assessments areas demonstrated inconsistent performance, above performance noted for the State of Alabama as a whole. Performance in the Huntsville MSA assessment area demonstrated inconsistent performance, below performance noted for the State of Alabama as a whole. Examiners placed the most weight on the bank's Mobile MSA assessment area.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different sizes. The Alabama Non-MSA and Mobile MSA assessment areas demonstrated consistent performance with the rated area. Performance in the Dothan MSA and Huntsville MSA assessments areas demonstrated inconsistent performance, above performance noted for the State

of Alabama as a whole. Examiners placed the most weight on the bank's Mobile MSA assessment area.

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in order to serve assessment area credit needs in the State of Alabama, considering the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion.

The table below shows that, since the previous evaluation, the bank originated 90 innovative or flexible loans totaling \$12.5 million in the State of Alabama. This dollar figure equates to 10.5 percent of the bank's overall innovative or flexible lending which is higher than the 4.1 percent dollar volume of home mortgage and CRA reportable loans for this rated area. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the State of Alabama.

Innovative or Flexible Lending Programs Alabama										
Assessment Area	Credit Plus/ Other Small Dollar Loans		AHP/HOSP		FHA/USDA/VA		SBA/SBB/FSA/ MS and USDA Small Business Programs		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama Non-MSA	7	12	0	0	6	2,289	0	0	13	2,301
Dothan MSA	57	81	0	0	1	462	4	6,904	62	7,447
Huntsville MSA	0	0	0	0	0	0	0	0	0	0
Mobile MSA	5	5	0	0	10	2,781	0	0	15	2,786
Total	69	98	0	0	17	5,532	4	6,904	90	12,534
<i>Source: Bank Data</i>										

Community Development Loans

The institution made an adequate level of CD loans in the State of Alabama. Its extent, or dollar volume, of CD loans support this conclusion. Performance in the Dothan MSA and Mobile MSA assessment areas demonstrated inconsistent performance rising above the state level. Performance in the Alabama Non-MSA and Huntsville MSA assessment areas demonstrated inconsistent performance falling significantly below the state level. Examiners placed the most weight on the bank's Mobile MSA assessment area.

The following table shows that, since the previous evaluation, the bank granted 20 CD loans totaling approximately \$37.4 million in this state. The dollar amount equates to 7.2 percent (or 7.7 percent of total CD loans less nationwide and regional activities) of the bank's overall excellent level of CD loans as compared to the 4.1 percent of overall HMDA and CRA data reportable loans attributed to this state.

Community Development Loans Alabama										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Alabama Non-MSA	0	0	0	0	0	0	0	0	0	0
Dothan MSA	0	0	0	0	1	1,885	4	6,381	5	8,266
Huntsville MSA	0	0	0	0	0	0	0	0	0	0
Mobile MSA	0	0	1	3,033	4	8,352	0	0	5	11,385
Statewide	0	0	0	0	9	11,728	1	6,000	10	17,728
Total	0	0	1	3,033	14	21,965	5	12,381	20	37,379
<i>Source: Bank Data</i>										

Besides their extent, the CD loans reflect adequate responsiveness to the state's CD needs given three of the four CD purpose represented. While there are no CD loans in the two assessment areas for the State of Alabama, refer to pages within the State of Alabama showing investments in the State of Alabama's two assessment areas to support responsiveness to CD needs.

The following points provides examples of the bank's CD lending activity in the broader statewide area of Alabama.

- ***Economic Development*** – The bank originated a loan totaling \$770,000 to a small farm under a government guarantee program with loan purpose criteria to keep the farm operating or expand operations. The loan retains permanent jobs for low- and moderate-income workers employed by the small farm.
- ***Revitalize and Stabilize*** – The bank originated a loan totaling \$6.0 million to finance the construction of a renewable energy facility employing approximately 100 full employees after completion. The loan financing is part of a New Market Tax credit project. The facility is located in a distressed middle-income tract that will attract individuals to the area for employment.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the State of Alabama regarding the Investment Test. The adequate level of qualified CD investments and grants and good responsiveness to CD needs outweighed no use of complex investments to support this conclusion. This conclusion is further supported by the high volume of regional activities within the State of Alabama. The Huntsville MSA, Mobile MSA, and Alabama Non-MSA assessment areas reflect consistent performance with the overall State of Alabama; however, the Dothan MSA assessment area reflects inconsistent performance as it exceeded overall performance for the state.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants in the State of Alabama. The table below shows that BankPlus made 63 qualified investments totaling approximately

\$381,000 in the State of Alabama. By dollar volume, this equates to 0.1 percent (or 0.7 percent of total qualified investments less regional activities) of the bank's overall excellent level of qualified investments as compared to 5.8 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area Alabama										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Dothan MSA	3	256	17	30	0	0	0	0	20	286
Huntsville MSA	1	4	2	5	0	0	0	0	3	9
Mobile MSA	1	4	14	26	4	9	2	5	21	44
Alabama Non-MSA	1	4	17	35	1	3	0	0	19	42
Total	6	268	50	96	5	12	2	5	63	381
<i>Source: Bank Data</i>										

Responsiveness to Credit and Community Development Needs

BankPlus exhibits good responsiveness to credit and CD needs through use of qualified investments that directly address identified needs in the State of Alabama. While the above table shows responsiveness to CD needs by the dollar amount in all four CD purpose categories, most investment funds financed affordable housing.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record for the State of Alabama regarding the Service Test. The reasonably accessible delivery systems and reasonableness of hours and service offset by the limited levels regarding the bank's CD services support this conclusion. The Dothan MSA and Mobile MSA assessment areas reflect performance consistent with the state level. The Alabama Non MSA and Huntsville MSA assessment areas reflect inconsistent performance below the state level.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment areas in the State of Alabama. Reasonably accessible branch distribution outweighed accessible alternative delivery systems to support this conclusion. The State of Alabama reflects a consistent conclusion to the institution's Accessibility of Delivery System performance.

The bank makes its full-service offices reasonably accessible to essentially all portions of the institution's assessment areas in the State of Alabama considering performance context. The good

record of branches in moderate-income census tracts lifted the poor record of branches in low-income to support the reasonably accessible conclusion.

The bank's branch distribution in low-income census tracts falls 7.6 percentage points below the population in these tracts, typically reflecting a poor level. The bank's branch distribution rises 8.0 percentage points above the population percentage in the moderate-income census tracts, reflecting a good level.

Branch and ATM Distribution by Geography Income Level Alabama												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	26	9.4	75,589	7.6	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	69	24.8	204,279	20.6	2	28.6	3	42.9	0	0.0	0	0.0
Middle	96	34.5	371,089	37.5	2	28.6	2	28.6	1	33.3	0	0.0
Upper	83	29.9	333,368	33.7	3	42.9	2	28.6	2	66.7	1	100.0
NA	4	1.4	5,963	0.6	0	0.0	0	0.0	0	0.0	0	0.0
Totals	278	100.0	990,288	100.0	7	100.0	7	100.0	3	100.0	1	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0 percent</i>												

The bank makes its alternative delivery systems accessible to essentially all portions of the bank's assessment areas in the State of Alabama. The bank's good performance for ATMs/ITMs in low- and moderate-income census tracts outweighed adequate performance for digital banking channels in low- and moderate-income census tracts.

The excellent record of ATMs/ITMs in moderate-income census tracts lifted the poor record of branches in low-income to support the accessible conclusion. The bank's ATMs/ITMs in low-income census tracts falls 7.6 percentage points below the population in these tracts, typically reflecting a poor level. The bank's ATMs/ITMs in moderate-income census tracts rises 22.3 percentage points above the population percentage, reflecting an excellent level. Several of the bank's ATMs/ITMs are in close proximity to low-income census tracts allowing access to banking services to low- and moderate-income census tracts.

Refer to the Service Test section for the overall bank for details on digital banking as well as services that provide banking access to low- and moderate-income people and tracts. The bank's COVID-19 response extended financial assistance to help many people avoid serious financial consequences during the pandemic.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the State of Alabama on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 29.0 percent compares reasonable to the population percentage in low- and

moderate- income census tracts at 28.2 percent.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the State of Alabama has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. No branch changes occurred in low- and moderate-income census tracts in the State of Alabama. One branch opened in a middle-income census tract and two branches opened in upper-income census tracts since the prior evaluation. The bank also closed one branch in an upper-income census tract since the prior evaluation.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Alabama, particularly low- or moderate-income geographies or individuals. The State of Alabama reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

The bank's branches have the same product offerings and services, and branch locations have similar hours. Branch hours are generally at least Monday to Friday from 9:00 a.m. to 4:00 p.m. Approximately 28.5 percent (2 of 7 branches) of the bank's locations have 7:00 a.m. to 7:00 p.m. drive-up hours Monday through Friday, in addition to Saturday drive-up hours. Two ITMs (Mobile MSA and Dothan MSA assessment areas) extends weekday and Saturday hours at locations with these machines.

Community Development Services

The institution has a limited level of CD services for the State of Alabama. Poor performance regarding the extent of CD services and poor responsiveness of CD services to available opportunities primarily support this conclusion.

The following table shows that the bank provided five CD services since the previous evaluation. This number equates to an average of 0.3 CD services, per office, per year, thereby reflecting a poor level. The bank averaged 6 full-service offices for the 2.7 years on average since the prior evaluation.

In addition to the extent of services, CD services reflect poor responsiveness to available opportunities as illustrated by their level of addressing identified CD needs in the bank's assessment areas. Only one of the bank's four assessment areas in the State of Alabama have any CD services inside the assessment areas.

Of the 55 CD services in the Regional rated area covering two to four rated areas (including the State of Alabama), many are virtual financial education classes with up to 47 participants. However, CD service opportunities exist within individual assessment areas in the State of Alabama.

Community Development Services Alabama					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Dothan MSA	0	3	0	0	3
Huntsville MSA	0	0	0	0	0
Mobile MSA	0	0	0	0	0
Alabama Non-MSA	0	0	0	0	0
Statewide Activities	0	0	0	2	2
Total	0	3	0	2	5
<i>Source: Bank Data (01/01/2021 – 12/31/2023)</i>					

The following is an example of a CD service specific to statewide activities in Alabama:

- ***Revitalize and Stabilize*** – Bank employees provided technical expertise at two events to a CDFI advisory council. These efforts take a collaborative approach of resources across CDFIs to implement programs specific to addressing community needs for the revitalization and stabilization of low- and moderate-income areas.

Please reference the full-scope assessment areas section for examples of the bank’s CD services.

MOBILE MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN MOBILE MSA ASSESSMENT AREA

The Mobile MSA assessment area includes all 135 census tracts that make up Mobile County, one of two counties that make up the Mobile, Alabama MSA, located in southern Alabama. On March 1, 2023, the Mobile MSA assessment area expanded to include all of Mobile County. Major loan products for the Mobile MSA assessment area are home mortgage and small business loans.

Economic and Demographic Data

The assessment area’s census tracts reflect the following income designations based on 2020 U.S. Census data: 9 low-, 42 moderate-, 48 middle-, 33 upper-income, and 3 income not available tracts. FEMA declared this assessment area as a major disaster area due to the COVID-19 pandemic and severe storms during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Mobile MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	6.7	31.1	35.6	24.4	2.2
Population by Geography	414,809	3.3	25.7	41.6	28.5	0.8
Housing Units by Geography	184,321	4.0	28.1	40.2	27.3	0.3
Owner-Occupied Units by Geography	100,955	2.1	20.7	44.2	32.7	0.3
Occupied Rental Units by Geography	56,602	6.1	38.4	35.6	19.4	0.4
Vacant Units by Geography	26,764	6.8	33.8	35.2	23.6	0.5
Businesses by Geography	45,554	3.5	26.8	34.5	34.9	0.3
Farms by Geography	976	2.4	17.4	45.7	34.4	0.1
Family Distribution by Income Level	102,767	21.9	17.5	19.9	40.7	0.0
Household Distribution by Income Level	157,557	25.7	15.2	17.0	42.1	0.0
Median Family Income MSA - 33660 Mobile, AL MSA		\$61,626	Median Housing Value			\$140,207
			Median Gross Rent			\$850
			Families Below Poverty Level			13.1%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

Economy: According to Moody’s Analytics, Precis U.S. Metro – April 2024, the Mobile MSA’s economy is outperforming the regions. The critical manufacturing industry experiences job growth outpacing that of the state and nation. The economy benefits from strong transportation infrastructure and consistent expansion at the Port of Mobile. After peaking late last year, nonfarm payrolls have fallen slightly, even as the state and nation press ahead. The logistics industry is shrinking faster than nationally. The Mobile MSA’s percentage of households with incomes less than \$40,000 is the largest income segment, approximately 5.0 percent higher compared to percentage for the nation. According to the U. S. Bureau of Labor Statistics as of December 2023, the Mobile MSA assessment area’s unemployment rate at 3.7 percent is above the State of Alabama at 2.8 percent and consistent with the national average at 3.7 percent. The population, housing and business information below is sourced from Mobile County specifically rather than the entire Mobile MSA.

Population: Utilizing data from the U.S. Census Vintage, the population remained stable between July 2022 and July 2023. According to the Census Reporter, the highest categories of population distribution age shows age 20-29 and age 30-39 at 13.0 percent, which is the same percentage as the State of Alabama. The age distribution of 65+ at 17.0 percent is similar to Alabama. The foreign born population represents 3.2 percent, slightly below the rate for Alabama at 3.8 percent.

Housing: According to the Census Reporter, the median household income of \$54,300 is below Alabama at \$59,674. The median housing value at \$180,700 is below Alabama at \$200,900 and

below that of the United States at \$320,900. According to RocketHomes, the median housing price of all sold homes increased by 4.1 percent between December 2022 and December 2023.

Business: 2023 D&B data show 45,554 total non-farm businesses in the assessment area, with 87.7 percent reporting gross annual revenues of \$1 million or less. The largest categories by employee size are 1-4 employees at 62.3 percent and 5-9 employees at 29.8 percent. Per Data USA, the largest industries in Mobile County are health care and social assistance, manufacturing, and retail trade. The highest paying industries are management of companies and enterprises, mining and oil-gas extraction, and utilities.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with 25 institutions having 106 offices serving the community. BankPlus ranks 14th in market share by capturing 1.2 percent of the area's deposits based on the June 30, 2023, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Mobile MSA assessment area created varied loan demand for home mortgage, small business, small farm, and consumer loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans, and construction loans for affordable single family and rental housing.

Demographic data indicates that a high percentage (39.4 percent) of the assessment area's families receive a designation of low- or moderate-income, with 13.1 percent below the poverty level. This signifies a continued need for CD services. The high percentage of small businesses with revenues of \$1 million or less supports the continued need for economic development. The high percentage of lower income paying jobs supports the need to attract new or expand existing businesses with higher paying jobs in the assessment area. The high percentage (37.8 percent) of low- and moderate-income census tracts and the multiple major disaster area declarations support the need for revitalization and stabilization efforts.

Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant retail banking service need existed for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. A financial inclusion need exists for increased access to consumer and commercial retail banking services to low- and moderate-income borrowers and tracts. Additionally, a retail banking service need exists for digital products with evolving features and technology built in to improve the customer's financial wellness.

CONCLUSIONS ON PERFORMANCE CRITERIA IN MOBILE MSA ASSESSMENT AREA

LENDING TEST

BankPlus demonstrated a low satisfactory record in the Mobile MSA assessment area regarding the Lending Test. Adequate performance regarding geographic distribution combined with good performance for CD lending hampered by poor borrower profile supports this conclusion. In addition, the bank demonstrated good lending levels and very poor use of innovative and flexible lending practices within this assessment area. Examiners weighed home mortgage loans heavier than small business loans in the Mobile MSA assessment area.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the Mobile MSA assessment area. Good performance regarding home mortgage outweighed by adequate performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to assessment area credit needs in the Mobile MSA assessment area. For 2022, the bank originated 36 total reportable home mortgage loans totaling approximately \$8.6 million. BankPlus captured a 0.3 percent market share of the total number and a 0.4 percent market share of the total dollar volume of home mortgage loans. The bank's activity by number of loans ranks it 60th out of 383 total lenders in the Mobile MSA assessment area. This ranking lands the bank in the top 15.7 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the Mobile MSA assessment area (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. For 2022, the bank originated 21 total reportable small business loans totaling approximately \$6.6 million. BankPlus captured a 0.2 percent market share of the total number of loans and a 1.2 percent market share of the total dollar volume of small business loans.

The bank's activity by number of loans ranks it 47th out of 95 total lenders in the Mobile MSA assessment area. This ranking lands the bank in the top 49.5 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar volume of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Mobile MSA assessment area. Adequate records regarding home mortgage loans outweighed good records

regarding small business loans to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Mobile MSA assessment area. Adequate performance in low-income and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts falls slightly below aggregate data by 0.8 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls below aggregate data by 2.9 percentage points, reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Mobile MSA Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.1	0.8	0	0	0	0
Moderate	20.7	14.0	4	11.1	278	3.2
Middle	44.2	42.7	14	38.9	3,946	45.9
Upper	32.7	42.5	18	50.0	4,364	50.8
Not Available	0.3	0.1	0	0	0	0
Totals	100.0	100.0	36	100.0	8,589	100.0
<i>Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent</i>						

Small Business Loans

The geographic distribution of small business loans reflects good performance in the Mobile MSA assessment area. Excellent performance in moderate-income geographies offset by adequate performance in low-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is lower than the aggregate data by 3.5 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level rises 28.0 percentage points above the aggregate data, reflecting an excellent level.

Geographic Distribution of Small Business Loans Mobile MSA Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	3.5	3.5	0	0	0	0
Moderate	27.2	24.0	13	52.0	3,680	45.6
Middle	34.8	36.3	4	16.0	1,712	21.2
Upper	34.2	36.0	8	32.0	2,680	33.2
Not Available	0.3	0.1	0	0	0	0
Totals	100.0	100.0	25	100.0	8,072	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different sizes. Poor records regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects poor performance in the Mobile MSA assessment area. Poor performance to moderate- income borrowers outweighed adequate performance to low-income borrowers to support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is below the aggregate data by 5.7 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 12.7 percentage points below the aggregate data, reflecting a poor level. Examiners weighed performance to moderate-income borrowers based on the greater lending opportunities evidenced by the percentage for aggregate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Mobile MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	21.9	5.7	0	0	0	0
Moderate	17.5	18.3	2	5.6	212	2.5
Middle	19.9	22.1	2	5.6	540	6.3
Upper	40.7	37.5	29	80.6	6,471	75.3
Not Available	0	16.4	3	8.3	1,367	15.9
Totals	100.0	100.0	36	100.0	8,589	100.0
Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects poor performance in the Mobile MSA assessment area. Poor performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending to businesses with gross annual revenues of \$1 million or less falls 10.9 percentage points below the aggregate performance, reflecting poor performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Mobile MSA Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	87.5	42.9	8	32.0	3,377	41.8
>\$1,000,000	3.6	--	16	64.0	4,589	56.9
Revenue Not Available	8.9	--	1	4.0	106	1.3
Totals	100	100.0	25	100.0	8,072	100.0
<i>Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent</i>						

Innovative or Flexible Lending Practices

The institution makes no use of innovative or flexible lending practices in the Mobile MSA assessment area in order to serve assessment area credit needs, considering the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion.

The dollar figure equates to 22.2 percent of the bank's overall innovative or flexible lending in the State of Alabama which is significantly below the 49.8 percent dollar volume of home mortgage and CRA reportable loans for the Mobile MSA assessment area. The dollar volume of innovative loan products and flexible lending practices, as found in the tabled data at the rated area level, supports this conclusion. Please refer to the discussion under the State of Alabama for additional details regarding the innovative or flexible lending practices in the Mobile MSA assessment area.

Community Development Loans

The institution makes a relatively high level of CD loans in the Mobile MSA assessment area. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, BankPlus originated 5 CD loans totaling \$11.4 million in the Mobile MSA assessment area. By dollar volume, this equates to 30.5 percent of the bank's adequate level of CD lending in the State of Alabama as compared to the 49.8 percent of the bank's home mortgage and CRA data reportable loans attributed to this assessment area.

The following point notes an example of the bank's CD lending in the Mobile MSA assessment area.

- ***Economic Development*** – The bank originated a loan totaling \$3.0 million for the renovation and conversion of a hotel to a new hotel chain during the pandemic, retaining jobs for low- and moderate-income individuals and helping this business with operating expenses as part of the economic recovery for hospitality businesses.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the Mobile MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments and grants and adequate responsiveness to CD needs outweighed no use of complex or innovative investments to support this conclusion.

Investment and Grant Activity

The bank has adequate level of qualified CD investments and grants in the Mobile MSA assessment area. As seen in the table for the State of Alabama, BankPlus made 21 qualified investments totaling approximately \$44,000 in the Mobile MSA assessment area. By dollar volume, this equates to 11.5 percent of the total adequate level of qualified investments in the State of Alabama as compared to 5.8 percent of total deposits in this rated area.

The following provides an example of key investments in the Mobile MSA assessment area.

- ***Community Service*** – The bank allocated approximately \$14,000 to a school where a majority students receive free/reduced lunch, in support of school resources and student academic achievement.

Responsiveness to Credit and Community Development Needs

BankPlus exhibited adequate responsiveness to credit and CD needs through use of investments that directly address several identified needs in the Mobile MSA assessment area. The qualified investment table for the State of Alabama shows responsiveness in the Mobile MSA assessment area by the dollar amount in all four CD purpose categories.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record in the Mobile MSA assessment area regarding the Service Test. The reasonableness of hours and services and accessible delivery systems offset by the very poor level of CD services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Mobile MSA assessment area. The Mobile MSA assessment area reflects consistent conclusion to the institution's Accessibility of Delivery System performance, with performance above the institution for branch distribution accessibility.

The bank makes its full-service office accessible to portions of the Mobile MSA assessment area. The excellent performance in moderate-income census tracts offset by the adequate performance in low-income census tracts.

As noted in the following table, the bank's branch distribution in low-income census tracts falls 3.3 percentage points below the population in these tracts, reflecting an adequate level. The bank's branch distribution rises 24.3 percentage points above the population percentage in the moderate-income census tracts, reflecting an excellent level.

Branch and ATM Distribution by Geography Income Level Mobile MSA Assessment Area												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	9	6.7	13,893	3.3	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	42	31.1	106,688	25.7	1	50.0	1	50.0	0	0.0	0	0.0
Middle	48	35.6	172,513	41.6	0	0.0	0	0.0	0	0.0	0	0.0
Upper	33	24.4	118,405	28.5	1	50.0	1	50.0	1	100.0	1	100.0
NA	3	2.2	3,310	0.8	0	0.0	0	0.0	0	0.0	0	0.0
Totals	135	100.0	414,809	100.0	2	100.0	2	100.0	1	100.0	1	100.0
<i>Source: 2020 U.S. Census; Bank Data</i>												
<i>Due to rounding, totals may not equal 100.0 percent</i>												

The bank makes its alternative delivery systems reasonably accessible to portions of the Mobile MSA assessment area. The good performance in ATMs/ITMs within low- and moderate-income census tracts offset by the poor performance in digital product usage in low- and moderate-income census tracts.

The excellent performance in moderate-income census tracts offset by the adequate performance in low-income census tracts. As noted in the above table, the bank's ATMs/ITMs in low-income census tracts falls 3.3 percentage points below the population in these tracts, reflecting an adequate level. The bank's ATMs/ITMs in moderate-income census tracts rises 24.3 percentage points above the population percentage, reflecting an excellent level.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the Mobile MSA assessment area on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census

tracts at 16.0 percent compares significantly below the population percentage in low- and moderate- income census tracts at 29.0 percent.

Refer to the Service Test section for the state for details on digital banking services that provide banking access to low- and moderate-income people and tracts.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the Mobile MSA assessment area has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate- income geographies and to low- and moderate-income individuals. No branch changes occurred in low- and moderate-income census tracts in the Mobile MSA assessment area. One branch relocated from an upper-income census tract to another upper-income census tract.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Mobile MSA assessment area, particularly low- or moderate-income geographies or individuals. The Mobile MSA assessment area reflects product offerings, services, and branch hours consistent with the State of Alabama.

The bank's branch has the product offerings and services are consistent with the State of Alabama. Branch hours are open at least from Monday through Friday 8:30 a.m. to 4:00 p.m. An ATM extends weekday and Saturday hours at one location with this machine.

Community Development Services

The institution has made few, if any, CD loans in the Mobile MSA assessment area. As noted under the rated area level, the bank did not provide any CD services in this assessment area.

The table in the State of Alabama section shows that the bank did not provide any CD services since the previous evaluation in the Mobile MSA assessment area. The bank averaged 2 branches for 3.0 years on average since the prior evaluation. Mobile MSA is an urban area with ample opportunities for CD services inside the assessment area. Additionally, statewide organizations can target CD service activities to smaller regions within the State of Alabama or to the Mobile MSA assessment area.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the

institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Alabama Non-MSA	Consistent	Consistent	Below
Dothan MSA	Exceeds	Exceeds	Consistent
Huntsville MSA	Consistent	Consistent	Below

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of BankPlus's operations and activities. The demographic data for the limited-scope assessment areas is in the appendices.

Alabama Non-MSA Assessment Area

The bank's Alabama Non-MSA assessment area consists of all of Coffee County. BankPlus operates one branch in this assessment area in a middle-income census tract, although accessible to near-by low- and moderate-income census tracts. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution overall. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	20	4,365
Small Business Loans	12	2,270
CD Loans	0	0
Investments	19	42
CD Services	0	--

Dothan MSA Assessment Area

The bank's Dothan Non-MSA assessment area consists of all of Geneva and Houston Counties. BankPlus operates three branches in this assessment area, one in a moderate-income census tract, one in a middle-income census tract, and one in an upper-income census tract. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance above the institution. The availability of alternative delivery systems also demonstrated inconsistent performance with the institution, with performance above the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	30	4,550
Small Business Loans	36	5,522
CD Loans	5	8,266
Investments	20	286
CD Services	3	--

Huntsville MSA Assessment Area

The bank's Huntsville MSA assessment area consists of all of Madison County. BankPlus operates one branch in this assessment area in an upper-income census tract, although accessible to near-by low- and moderate-income census tracts. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution overall. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	1	220
Small Business Loans	1	8
CD Loans	0	0
Investments	3	9
CD Services	0	--

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income census tracts			Moderate-Income census 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
Al Non-MSA	20	4,365	39.2	2,027	0.0	0.0	0.0	4.5	0.0	4.6	45.4	30.0	40.7	50.1	70.0	54.7	0.0	0.0	0.0
Dothan MSA	30	4,550	58.8	3,666	1.2	3.3	0.8	21.7	43.3	15.7	44.5	26.7	43.1	32.5	26.7	40.3	0.0	0.0	0.0
Huntsville MSA	1	220	2.0	17,711	7.6	0.0	6.1	14.7	0.0	13.6	32.1	100.0	36.9	45.6	0.0	43.4	0.1	0.0	0.1
Total	51	9,135	100.0	23,404	5.4	2.0	4.7	15.4	25.5	13.2	36.1	29.4	38.2	43.0	43.1	43.9	0.1	0.0	0.1
Source: 2020 U.S. Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income census tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
AL Non-MSA	12	2,270	24.5	779	0.0	0.0	0.0	14.8	33.3	12.6	45.6	8.3	43.9	39.7	58.3	43.5	0.0	0.0	0.0
Dothan MSA	36	5,522	73.5	2,985	11.1	11.1	9.0	24.5	30.6	22.4	30.4	27.8	33.6	34.0	30.6	34.9	0.0	0.0	0.0
Huntsville MSA	1	8	2.0	8,284	16.1	0.0	15.3	15.4	0.0	14.1	23.5	0.0	24.9	42.0	100.0	43.3	3.0	0.0	2.4
Total	49	7,800	100.0	12,048	13.9	8.2	12.7	17.5	30.6	16.1	26.6	22.4	28.3	40.0	38.8	41.2	2.1	0.0	1.7

Source: 2022 D&B Data; 1/1/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
AL Non-MSA	20	4,365	39.2	2,027	17.2	5.0	2.6	14.4	0.0	10.0	17.4	15.0	19.1	51.0	60.0	47.6	0.0	20.0	20.8
Dothan MSA	30	4,550	58.8	3,666	22.7	6.7	8.7	18.0	6.7	17.4	17.9	13.3	20.6	41.3	46.7	34.2	0.0	26.7	19.1
Huntsville MSA	1	220	2.0	17,711	23.0	0.0	7.1	15.4	0.0	16.6	18.4	0.0	21.4	43.1	0.0	38.0	0.0	100.0	16.9
Total	51	9,135	100.0	23,404	22.4	5.9	7.0	15.9	3.9	16.2	18.2	13.7	21.0	43.5	51.0	38.2	0.0	25.5	17.6

Source: 2020 U.S. Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
AL Non-MSA	12	2,270	24.5	779	87.4	50.0	53.4	3.3	50.0	9.3	0.0
Dothan MSA	36	5,522	73.5	2,985	87.1	72.2	44.0	3.8	16.7	9.1	11.1
Huntsville MSA	1	8	2.0	8,284	88.8	100.0	46.3	3.1	0.0	8.2	0.0
Total	49	7,800	100.0	12,048	88.3	67.3	46.2	3.2	24.5	8.5	8.2
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent											

FLORIDA

CRA RATING FOR FLORIDA: NEEDS TO IMPROVE

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Needs to Improve

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

BankPlus designated one assessment area in the State of Florida as noted in the table below. The Destin MSA assessment area includes all 21 census tracts that make up Walton County, 1 of the 2 counties that make up the Crestview-Fort Walton Beach-Destin, Florida MSA (Destin MSA) located in northwest Florida. On March 1, 2022, the bank designated the Destin MSA assessment area as a new assessment area due to the First Bank and Trust, New Orleans, Louisiana acquisition. The bank's sole assessment area in Florida conforms to the CRA regulatory requirements. The bank operates one full-service office located in an upper-income tract and one loan production office in this area.

Economic and Demographic Data

The assessment area's census tracts reflect the following income designations based on 2020 U.S. Census data: one low-, four moderate-, nine middle-, six upper-income census tracts, and one tract with no income designation. FEMA declared this assessment area as a major disaster area due the COVID-19 pandemic and severe storms during a portion of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Florida - Destin MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	19.0	42.9	28.6	4.8
Population by Geography	75,305	4.6	18.0	46.9	30.5	0.0
Housing Units by Geography	53,637	3.0	12.2	33.8	51.1	0.0
Owner-Occupied Units by Geography	21,774	4.2	18.8	44.8	32.2	0.0
Occupied Rental Units by Geography	6,861	6.0	23.1	41.8	29.1	0.0
Vacant Units by Geography	25,002	1.0	3.4	22.0	73.6	0.0
Businesses by Geography	20,777	2.9	8.4	34.8	54.0	0.0
Farms by Geography	553	3.6	19.5	50.6	26.2	0.0
Family Distribution by Income Level	20,034	20.1	18.7	21.4	39.8	0.0
Household Distribution by Income Level	28,635	23.9	15.8	18.8	41.5	0.0
Median Family Income MSA - 18880 Crestview-Fort Walton Beach-Destin, FL MSA		\$79,490	Median Housing Value			\$363,182
			Median Gross Rent			\$1,340
			Families Below Poverty Level			8.4%
Source: 2020 U.S. Census Data; 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

Economy: According to Moody’s Analytics, Precis U.S. Metro – April 2024, the Destin MSA’s economy expansion is slowing. Nonfarm payroll growth outpaced that of the state for most of the fall. Single-family house prices had essentially plateaued despite recently resuming an upward statewide trend. This owes largely to a pickup in housing supply, as 2023 was the second-strongest year for starts in more than four decades of tracking. The Destin MSA benefits from being a destination for retirees from other parts of the nation. The Destin MSA is a top 20 metro area in the nation for employment in leisure/hospitality and retail trade. The metro area is home to Eglin Air Force Base, the largest Air Force base in the nation and a source of more than 6,000 civilian jobs. According to the U. S. Bureau of Labor Statistics as of December 2023, the Destin MSA assessment area’s unemployment rate at 3.2 percent is slightly above the State of Florida at 3.1 percent and below the national average at 3.7 percent. The population, housing and business information below is sourced from Walton County specifically rather than the entire Destin MSA.

Population: Utilizing data from the U.S. Census Vintage, the population grew 3.4 percent between July 2022 and July 2023. According to the Census Reporter, the highest category of population distribution age shows age 50-59 and age 60-69 at 15 percent, which is higher than the percentage for the State of Florida. The foreign born population represents 7.1 percent, significantly below the rate for Florida at 21.7 percent.

Housing: According to the Census Reporter, the median household income of \$74,620 is higher than Florida at \$69,303. The median housing value at \$398,600 is significantly above Florida at \$354,100

and above the United States at \$320,900. According to RocketHomes, the median housing price of all sold homes decreased by 2.7 percent from \$638,500 in December 2022 to \$622,000 in December 2023.

Business: 2023 D&B data show 23,888 total non-farm businesses in the assessment area, with 94.1% reporting gross annual revenues of \$1 million or less. The largest categories by employee size are 1-4 employees at 60.4 percent and 5-9 employees at 35.6 percent. Per Data USA, the largest industries in Walton County are construction, accommodation & food service, and retail trade. The highest paying industries are management of agriculture & fishing, wholesale trade, and professional and technical services.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with 18 institutions having 34 offices serving the community. BankPlus ranks 14th in market share by capturing 1.5 percent of the area's deposits based on the June 30, 2023, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners contacted a third party active in the assessment area to assist in identifying the credit needs. This information helps determine local financial institution's responsiveness to these needs. It also shows what credit opportunities are available.

Examiners utilized a contact from an organization whose mission is to attract new investments to the area creating quality jobs. The organization's primary geographic focus includes Walton County as part of the northwestern part of the state. The community contact stated the community is affluent with a significant lack for affordable rental and owner-occupied housing for low- and moderate-income individuals. With current average housing prices, housing is not affordable to individuals with a beginning six figure income. Given the tourism market, many of the houses are business use, such as Airbnb use. The community contact stated that banks can work with organizations to attract businesses to the area. The contact indicated that a credit need exists for banks to make it easier to businesses to finance mixed use commercial/residential buildings in the assessment area. The contact also indicated banks in general are involved in the assessment; however, the banks can work together to remove obstacles and other challenges in bringing affordable housing to the assessment area. Lastly, the contact stated a CD service need for financial literacy and education.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Destin MSA assessment area created varied loan demand for home mortgage loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of

the area include home mortgage and partnering with government officials, developers, and other organizations to create affordable single family and rental housing.

The high median sales price for homes sold supports a significant need for affordable housing. Demographic data indicates that a high percentage (38.8 percent) of the assessment area's families receive a designation of low- or moderate-income. This signifies a continued need for CD services. The percentage (23.8 percent) of low- and moderate-income census tracts and the multiple major disaster area declarations support the need for revitalization and stabilization efforts. The higher percentage and growing retirement population supports the needs for affordable health services, especially for retirees on fixed incomes.

Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant retail banking service need existed for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. A financial inclusion need exists for increased access to consumer and commercial retail banking services to low- and moderate-income borrowers and tracts. Additionally, retail banking service needs exists for digital products with evolving features and technology built in to improve the customer's financial wellness.

SCOPE OF EVALUATION – FLORIDA

Examiners applied full-scope procedures to the Destin MSA assessment area since this assessment area is the bank's sole assessment area in this rated area. The major loan product in this area is home mortgage loans. Examiners considered the following loans granted inside the bank's Destin MSA assessment area:

Home Mortgage Loans:

- 2021: 11 loans totaling \$10,060,618
- 2022: 39 loans totaling \$20,499,997
- 2023: 52 loans totaling \$35,703,192

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORIDA

LENDING TEST

BankPlus demonstrated a needs to improve record in the State of Florida regarding the Lending Test. The poor geographic distribution and very poor borrower profile outweighed the adequate level of CD lending to support this conclusion. The bank further made limited use of innovative and flexible lending levels and demonstrated excellent lending levels in this rated area.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Destin MSA assessment area. Excellent performance regarding home mortgage loans considering both the

number and dollar amount of loans combined support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Destin MSA assessment area. Home mortgage lending reflects combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 58 total reportable home mortgage loans totaling approximately \$30.5 million. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 0.9 percent market share of the total number and a 0.7 percent market share of the total dollar volume of home mortgage loans.

The activity by number of loans ranks the bank 30th out of 627 total lenders in the Destin MSA assessment area. This ranking lands the bank in the top 4.8 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of home mortgage loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the Destin MSA assessment area. Poor records in the Destin MSA assessment area regarding home mortgage loans support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor performance in the Destin MSA assessment area. Poor performance in moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is lower than the aggregate data by 1.3 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 7.9 percentage points below the aggregate data, reflecting a poor level. Examiners placed more weight on performance in moderate-income census tracts for the overall conclusion given the higher demographic percentage.

Geographic Distribution of Home Mortgage Loans Florida - Destin MSA Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	4.2	1.3	0	0.0	0	0.0
Moderate	18.8	7.9	0	0.0	0	0.0
Middle	44.8	36.2	8	20.5	2,943	14.4
Upper	32.2	54.6	31	79.5	17,557	85.6
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	39	100.0	20,500	100.0
Source: 2020 U.S. Census Data; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers in the Destin MSA assessment area reflects very poor penetration among retail customers of different income levels and business customers of different sizes. Very poor records regarding home mortgage loans within the Destin MSA assessment area support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects very poor performance in the Destin MSA assessment area. Very poor performance is based on the bank not originating any home mortgage loans to low-income borrowers and moderate-income borrowers to support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is lower than the aggregate data by 3.2 percentage points, typically reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 8.5 percentage points below the aggregate data, also typically reflecting a poor level.

Examiners placed more weight on the bank not originating any home mortgage loans to both low-income and moderate-income borrowers for two reasons. First, a high priority credit need mentioned previously exists for home mortgage loans affordable to low- and moderate-income individuals, including working with partners to increase the supply of affordable housing. Second, the aggregate performance evidence home mortgage lending opportunities to low- and moderate-income individuals in the Destin MSA assessment area. Specifically, the bank's home mortgage performance is significantly below aggregate performance when considering low-income and moderate-income borrowers.

Distribution of Home Mortgage Loans by Borrower Income Level Florida - Destin MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.1	3.2	0	0.0	0	0.0
Moderate	18.7	8.5	0	0.0	0	0.0
Middle	21.4	12.7	3	7.7	1,000	4.9
Upper	39.8	58.3	26	66.7	11,843	57.8
Not Available	0.0	17.3	10	25.6	7,658	37.4
Totals	100.0	100.0	39	100.0	20,500	100.0
Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in the Destin MSA assessment area to serve assessment area credit needs. The number and dollar volume of innovative loan products and flexible lending practices, as found in the tabled data at the rated area level, supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion.

Since the previous evaluation, the bank originated five innovative or flexible loans totaling \$2.9 million in the State of Florida. This dollar figure equates to 2.4 percent of the total innovative or flexible loans, which is comparable to the 2.5 percent of home mortgage and CRA reportable loans for the Destin MSA assessment area. Given the capacity and the needs in the assessment area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the area. Please refer to the discussion under the Institution level for additional details regarding the innovative or flexible lending practices in the State of Florida.

Community Development Loans

The institution has made an adequate level of CD loans in the Destin MSA assessment area. The adequate dollar volume and the adequate responsiveness to assessment area credit needs to support this conclusion.

The bank granted one CD loans totaling approximately \$4.9 million in this state. The dollar amount equates to 1.0 percent of the bank's overall excellent level of CD loans as compared to the 2.5 percent of overall HMDA and CRA loans attributed to this area.

In addition, the CD loans reflect adequate responsiveness to the CD needs of the assessment area. The one CD loan demonstrates responsiveness to affordable housing needs, which is a high priority CD need given housing prices in the Destin assessment area. However, as mentioned previously, information from the community contact and demographic data shows significantly high housing prices, supporting a high priority need for CD loans to create additional supply of affordable housing.

The following is the notable CD loan in the Destin MSA assessment area:

- ***Affordable Housing*** – The bank originated a loan totaling \$4.9 million loan to fund a mobile home park with rents affordable to low- and moderate-income people, which is a critical need for the Destin MSA assessment area, given the high price of other types of homes and limited supply of affordable housing.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the State of Florida regarding the Investment Test. The adequate level of qualified investments and responsiveness to CD needs outweighed no use of complex or innovative investments to support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants, in the Destin MSA assessment area. BankPlus made seven qualified investments totaling approximately \$31,000 in the Destin MSA assessment area. By dollar volume, this equates to a nominal percent (or 0.1 percent of total qualified investments less regional activities) of the bank's overall excellent level of qualified investments as compared to 0.6 percent of total deposits attributed to this rated area. Refer to the qualified investment table at the institution level for details on specific qualified investment levels within each community development category.

The following provides an example of a key investment in the Destin MSA assessment area.

- ***Community Service*** –The bank allocated approximately \$12,500 to community organizations that provide health and human services to low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

BankPlus' CD activities show adequate responsiveness to credit and CD needs through use of investments that directly address identified needs in the State of Florida. The previous table shows adequate responsiveness to a variety of CD needs by the dollar amount in two of the four CD purpose categories, with an emphasis on community service.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a needs to improve record for the State of Florida regarding the Service Test. The very poor level regarding the bank's CD services and poor level regarding alternative delivery systems outweighed reasonably accessible delivery systems and reasonableness of hours

and services to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Destin MSA assessment area. Reasonably accessible branch distribution outweighed limited access to alternative accessible alternative delivery systems to support this conclusion. The Destin MSA assessment area reflects a consistent conclusion to the institution's Accessibility of Delivery System performance.

The bank makes its full-service offices reasonably accessible to portions of the institution's Destin MSA assessment area, considering performance context.

This rated area and assessment area is new since the previous evaluation. As noted in the following table, the bank's branch distribution in low-income census tracts falls 4.6 percentage points below the population in these tracts, reflecting an adequate level. The bank's branch distribution falls 18.0 percentage points below the population percentage in the moderate-income census tracts, typically reflecting a very poor level. However, the bank's full-service branch in close proximity to low- and moderate- income census tracts allows access to banking services to low- and moderate-income census tracts. Also, considering the bank operates one location within the State of Florida, limits the impact of branch distribution on the accessibility of services.

Branch and ATM Distribution by Geography Income Level Florida - Destin MSA Assessment Area												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	1	4.8	3,429	4.6	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	19.0	13,586	18.0	0	0.0	0	0.0	0	0.0	0	0.0
Middle	9	42.9	35,308	46.9	0	0.0	0	0.0	0	0.0	0	0.0
Upper	6	28.6	22,982	30.5	1	100.0	0	0.0	1	100.0	0	0.0
NA	1	4.8	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	21	100.0	75,305	100.0	1	100.0	0	100.0	1	100.0	0	0.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0 percent</i>												

The bank makes its alternative delivery systems accessible to limited portions of the bank's assessment areas in the Destin MSA assessment area, particularly with the very low percentage usage of online banking in low- and moderate-income census tracts. The bank's lack of ATMs/ITMs and very low percentage usage of online banking in low- and moderate-income census tracts supports this conclusion. Additionally, the bank opened one loan production office in June 2023, located in an upper-income tract.

Refer to the Service Test section for the overall bank for details on digital banking that provide banking access to low- and moderate-income people and tracts. The bank's COVID-19 response extended financial assistance to help many people avoid serious financial consequences during the

pandemic.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the State of Florida on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 3.6 percent is significantly below the population percentage in low- and moderate-income census tracts at 22.6 percent.

Changes in Branch Locations

This is a new rated area and assessment area since the previous evaluation. To the extent changes have been made, the institution's record of opening and closing of branches in the Destin MSA assessment area has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. No branch changes occurred in low- and moderate-income census tracts in the Destin MSA assessment area. The sole branch in the State of Florida acquired from the First Bank and Trust, New Orleans, Louisiana acquisition opened in an upper-income census tract.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Destin MSA assessment area, particularly low- or moderate-income geographies or individuals. The Destin MSA assessment area reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

The bank's branch has the same product offerings and services, and the branch has similar hours to the bank as a whole. Branch hours are from Monday through Friday 9 a.m. to 5 p.m. The branch location does not have an ATM.

Community Development Services

The institution has made few, if any CD services for the Destin MSA assessment area. Very poor performance regarding the extent of CD services and the responsiveness of CD services to available opportunities primarily support this conclusion.

In the Destin MSA assessment area, the bank did not provide any CD services since the previous evaluation. The bank's sole branch operating during the CD service review period was open 1.8 years. The Destin MSA assessment area is an urban area with opportunities for CD services. Additionally, statewide organizations can target CD service activities to smaller regions such as the Destin MSA assessment area.

LOUISIANA

CRA RATING FOR LOUISIANA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LOUISIANA

BankPlus designated five assessment areas in the State of Louisiana as noted in the table below. All assessment areas in Louisiana conform to the CRA regulatory requirements.

Description of Assessment Areas Louisiana			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Baton Rouge MSA	Ascension, East Baton Rouge, Livingston, Pointe Coupee	178	5
Hammond MSA	Tangipahoa	31	2
Lafayette MSA	Lafayette	58	1
Louisiana Non-MSA	St. Landry	28	1
New Orleans MSA	Jefferson, Orleans, St. Tammany	371	8
Source: Bank Data; 2020 U.S. Census Data			

SCOPE OF EVALUATION – LOUISIANA

Of the five assessment areas in Louisiana, examiners applied full-scope procedures to the New Orleans MSA assessment area since this assessment area includes the highest percentage of the bank's loans, deposits, and branches in this rated area and has not been reviewed under full-scope procedures in prior evaluations. Examiners applied limited-scope procedures to the other Louisiana assessment areas. Major loan products for the State of Louisiana are home mortgage and small business loans, except for the Louisiana Non-MSA assessment area where the major loan product is small business loans.

Examiners considered the following loans granted inside the bank's Louisiana assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:

- 2021: 177 loans totaling \$81,646,459
- 2022: 356 loans totaling \$171,761,120
- 2023: 332 loans totaling \$156,238,959

Small Business Loans:

- 2021: 492 loans totaling \$39,791,000

- 2022: 269 loans totaling \$58,666,000
- 2023: 345 loans totaling \$69,276,000

As suggested by the above figures, home mortgage loans received the heaviest weighting given the higher dollar volume.

The following table shows that the New Orleans MSA assessment area generated the largest percentage of the bank's Louisiana loans, deposits, and branches. Consequently, examiners weighed records in the New Orleans MSA assessment area heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Louisiana						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Baton Rouge MSA	132,142	22.8	145,540	14.1	5	29.4
Hammond MSA	49,924	8.6	168,865	16.3	2	11.8
Lafayette MSA	21,015	3.6	32,153	3.1	1	5.9
Louisiana Non-MSA	2,265	0.4	25,185	2.4	1	5.9
New Orleans MSA	373,772	64.6	662,971	64.1	8	47.0
Total	579,118	100.0	1,034,746	100.0	17	100.0
<i>Source: 2021-2023 HMDA Reported Data; 2021-2023 CRA Reported Data; FDIC Summary of Deposits (6/30/2023); * Active full-service branches only as of the CRA evaluation date as BankPlus closed branches after the FDIC Summary of Deposits (6/30/2023); Due to rounding, totals may not equal 100.0 percent</i>						

CONCLUSIONS ON PERFORMANCE CRITERIA IN LOUISIANA

LENDING TEST

BankPlus demonstrated a low satisfactory record in the State of Louisiana regarding the Lending Test. Adequate performance records regarding borrower profile and CD lending outweighed poor geographic distribution to primarily support this conclusion. The bank further made little use of innovative and flexible lending levels and demonstrated good lending levels in this rated area. Conclusions regarding the institution's performance in the State of Louisiana were consistent with the conclusions for the Baton Rouge MSA, Hammond MSA, Lafayette MSA, Louisiana Non-MSA, and New Orleans MSA assessment areas.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the State of Louisiana. Excellent performance regarding home mortgage loans offset by adequate performance on small business loans support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the State of Louisiana. Home mortgage lending reflects combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 344 total reportable home mortgage loans totaling approximately \$195.0 million. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 0.6 percent market share of the total number and a 1.2 percent market share of the total dollar volume of home mortgage loans.

This volume of activity ranks the bank 37th out of 583 total lenders in the bank's Louisiana assessment areas. This ranking lands the bank in the top 6.3 percent of lenders reporting such loans in the bank's Louisiana assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the State of Louisiana. For 2022, the bank originated 159 total reportable small business loans totaling approximately \$36.2 million inside its Louisiana assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 0.2 percent market share and a 1.3 percent market share of the total dollar volume of small business loans.

This volume of activity ranks the bank 44th out of 169 total lenders in the bank's Louisiana assessment areas. This ranking lands the bank in the top 26.0 percent of lenders reporting such loans in the bank's Louisiana assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the State of Louisiana. The New Orleans MSA assessment area demonstrated consistent performance with the rated area. Performance in the Baton Rouge MSA, Hammond MSA, Lafayette MSA, and Louisiana Non-MSA assessments areas demonstrated inconsistent performance, above performance noted for the State of Louisiana as a whole. Examiners placed the most weight on the bank's New Orleans MSA assessment area.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. The Baton Rouge MSA and New Orleans MSA assessment areas demonstrated consistent performance with the rated area. Performance in the Louisiana Non-MSA assessment area demonstrated inconsistent performance, above performance noted for the State of Louisiana as a

whole. Performance in the Hammond MSA and Lafayette MSA assessment areas demonstrated inconsistent performance, below performance noted for the State of Louisiana as a whole. Examiners placed the most weight on the bank's New Orleans MSA assessment area.

Innovative or Flexible Lending Practices

The institution makes little use of innovative or flexible lending practices in order to serve assessment area credit needs in the State of Louisiana, considering the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion.

The table below shows that, since the previous evaluation, the bank originated 166 innovative or flexible loans totaling approximately \$15.1 million in the State of Louisiana. This dollar figure equates to 12.6 percent of the total of the bank's overall good level of innovative or flexible loans which is significantly below the 21.7 percentage dollar volume of home mortgage and CRA reportable loans for the State of Louisiana. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects poor responsiveness to the credit needs of the State of Louisiana.

Innovative or Flexible Lending Programs Louisiana										
Assessment Area	Credit Plus/Other Small Dollar Loans		AHP/HOSP		FHA/USDA/VA		SBA/SBB/FSA/MS and USDA Small Business Programs		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Baton Rouge MSA	58	72	0	0	12	3,396	0	0	70	3,468
Hammond MSA	30	36	1	196	10	2,468	0	0	41	2,700
Lafayette MSA	0	0	0	0	0	0	0	0	0	0
Louisiana Non-MSA	12	17	0	0	1	88	0	0	13	105
New Orleans MSA	28	38	8	1,297	4	752	2	6,767	42	8,854
Total	128	163	9	1,493	27	6,704	2	6,767	166	15,127
<i>Source: Bank Data</i>										

Community Development Loans

The institution made an adequate level of CD loans in the State of Louisiana. Its extent, or dollar volume, of CD loans outweighed the CD loans' responsiveness support this conclusion. Performance in the Baton Rouge MSA, Hammond MSA, Lafayette MSA, Louisiana Non-MSA, and New Orleans assessment areas demonstrated consistent performance with the state as a whole.

The following table shows that, since the previous evaluation, the bank granted 46 CD loans totaling approximately \$138.1 million in this state. The dollar amount equates to 26.8 percent (or 28.5 percent of total CD loans less nationwide and regional activities) of the bank's overall

excellent level of CD loans as compared to the 21.7 percent of overall HMDA and CRA loans attributed to this state.

Community Development Loans Louisiana										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Baton Rouge MSA	9	10,493	1	1,600	4	14,102	0	0	14	26,195
Hammond MSA	6	3,149	0	0	1	5,700	0	0	7	8,849
Lafayette MSA	1	8,236	0	0	1	1,131	0	0	2	9,367
Louisiana Non-MSA	0	0	0	0	0	0	0	0	0	0
New Orleans MSA	11	31,456	0	0	3	26,120	4	29,740	18	87,316
Statewide	1	136	0	0	2	3,676	2	2,562	5	6,374
Total	28	53,470	1	1,600	11	50,729	6	32,302	46	138,101
<i>Source: Bank Data</i>										

Besides their extent, the CD loans reflect good responsiveness to the state's CD needs given the dollar volume in three of the four CD purpose represented. While there are no CD loans in the one assessment area for the State of Louisiana, refer to pages within the State of Louisiana showing investments in the State of Louisiana's assessment area to support responsiveness to CD needs.

The following points discuss examples of the bank's CD lending activities in the broader statewide area of Louisiana.

- ***Affordable Housing*** – The bank originated a loan totaling \$136,000 to fund an apartment building with rents affordable to low- and moderate-income individuals.
- ***Economic Development*** – The bank originated a loan totaling \$1.4 million to finance the construction of a small business facility leased by a government agency that provides loans and other economic development resources to help small businesses and small farms in rural areas, including helping these businesses and farms with job creation and retention.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the State of Louisiana regarding the Investment Test. The adequate level of qualified CD investment and grants and the good responsiveness to CD needs outweighed no use of complex investments to support this conclusion. The Hammond MSA, Lafayette MSA, New Orleans MSA, and Louisiana MSA assessment areas reflect consistent performance for the Investment Test; however, the Baton Rouge MSA assessment area reflects inconsistent performance as it exceeded overall performance for the state.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants in the State of Louisiana. The table below shows that BankPlus made 92 qualified investments totaling approximately \$8.4 million in the State of Louisiana. By dollar volume, this equates to 2.6 percent (or 15.8 percent of total qualified investments less regional activities) of the bank's overall excellent level of qualified investments as compared to 17.8 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area Louisiana										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Baton Rouge MSA	7	4,106	21	82	3	13	1	2	32	4,203
Hammond MSA	4	578	11	29	0	0	0	0	15	607
Lafayette MSA	1	5	1	3	1	2	0	0	3	10
New Orleans MSA	8	2,922	28	606	0	0	2	13	38	3,541
Louisiana Non-MSA	0	0	3	6	1	2	0	0	4	8
Total	20	7,611	64	726	5	17	3	15	92	8,369
Source: Bank Data										

Responsiveness to Credit and Community Development Needs

BankPlus exhibits good responsiveness to credit and CD needs through use of qualified investments that directly address identified needs in the State of Louisiana. While the above table shows responsiveness to CD needs by the dollar amount in all four CD purpose categories, most investment funds financed affordable housing.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record for the State of Louisiana regarding the Service Test. The accessible delivery systems offset by the poor levels regarding the bank's CD services combined with the changes in branch locations and reasonableness of hours support this conclusion. The Baton Rouge MSA and New Orleans MSA assessment areas reflect performance consistent with the state level. The Hammond MSA assessment area reflects performance above the state level. The Lafayette MSA and Louisiana Non-MSA assessment areas reflects performance below the state level.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's assessment areas in the State of Louisiana. Accessible branch distribution and alternative accessible alternative delivery

systems support this conclusion. The State of Louisiana reflects an inconsistent conclusion to the institution's Accessibility of Delivery System performance, with performance above the institution.

The bank makes its full-service offices accessible to essentially all portions of the institution's assessment areas in the State of Louisiana. The excellent record of branches in moderate-income lifted the adequate record of branches in low-income to support the accessible conclusion.

Typically, the bank's branch distribution in low-income census tracts falls 3.2 percentage points below the population of low-income census tracts, reflecting adequate performance. In moderate-income census tracts, the bank's branch distribution rises 19.7 percentage points above the population percentage, reflecting excellent performance.

Branch and ATM Distribution by Geography Income Level Louisiana												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	76	11.4	209,716	9.1	1	5.9	1	5.6	1	7.1	0	0.0
Moderate	158	23.7	493,864	21.5	7	41.2	8	44.4	4	28.6	1	14.3
Middle	189	28.4	737,628	32.2	3	17.6	4	22.2	1	7.1	0	0.0
Upper	214	32.1	806,561	35.2	6	35.3	5	27.8	8	57.1	6	85.7
NA	29	4.4	45,350	2.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	666	100.0	2,293,119	100.0	17	100.0	18	100.0	14	100.0	7	100.0
Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0 percent												

The bank makes its alternative delivery systems accessible to essentially all portions of the bank's assessment areas in the State of Louisiana. The bank's good performance for ATMs/ITMs in low- and moderate-income census tracts outweighed adequate performance for digital banking channels in low- and moderate-income census tracts.

The excellent record of ATMs/ITMs in moderate-income census tracts lifted the adequate record of ATMs/ITMs in low-income census tracts to support the accessible conclusion. The preceding table shows that the bank's ATMs/ITMs in low-income census tracts falls 3.5 percentage points below the population, reflecting adequate performance. The bank's ATMs/ITMs in moderate-income census tracts rises 22.9 percentage points above the population of moderate-income census tracts, reflecting excellent performance.

Refer to the Service Test section for the overall bank for details on digital banking services that provide banking access to low- and moderate-income people and tracts. The bank's COVID-19 response extended financial assistance to help many people avoid serious financial consequences during the pandemic.

In addition to the overall bank statistics on digital banking channels, the bank provided data on for

the State of Louisiana on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 25.7 percent compares reasonable to the population percentage in low- and moderate- income census tracts at 30.6 percent.

Changes in Branch Locations

This is a new rated area since the previous evaluation. To the extent changes have been made, the institution's record of opening and closing of branches in the State of Louisiana has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Branch changes resulted in a net gain of four branches in low- and moderate-income census tracts in the State of Louisiana. Specifically, one branch opening occurred in a low-income census tract and four branch openings occurred in moderate-income census tracts, while no branch closings occurred in low-income census tracts and one branch closing occurred in a moderate-income census tract.

The branch openings in low- and moderate-income census tracts were mainly from the acquisition of the First Bank and Trust, New Orleans, Louisiana. The branch closing in the moderate-income tract (Hammond MSA assessment area) was from the consolidation of acquired branches with BankPlus existing branches. Both of the remaining active branches in the Hammond MSA are located in low- and moderate-income census tracts.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Louisiana, particularly low- or moderate-income geographies or individuals. The State of Louisiana reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

The bank's branches have the same product offerings and services, and branch locations have similar hours. Branch hours are generally at least Monday to Friday from 9:00 a.m. to 4:00 p.m. An ITM extends weekday and Saturday hours at one location (New Orleans MSA assessment area) with this machine.

Community Development Services

The institution has a limited level of CD services for the State of Louisiana. Poor performance regarding the extent of CD services outweighed adequate responsiveness of CD services to available opportunities primarily support this conclusion.

The following table shows that the bank provided 41 CD services since the previous evaluation. This number equates to an average of 0.8 CD services, per office, per year, since the previous evaluation, thereby reflecting a poor level. The bank averaged 22 branches for 2.3 years on average since the prior evaluation.

In addition to the extent of services, CD services reflect adequate responsiveness to available opportunities as illustrated by their level of addressing identified CD needs in the bank's assessment areas. Additional opportunities exist to revitalize or stabilize low- and moderate-income areas or FEMA designated disaster areas given the number of these tracts in the institution's wide geographic area for the State of Louisiana.

Of the 70 CD services in the Regional rated area covering two to four rated areas (including the State of Louisiana), many are virtual financial education classes with up to 47 participants. However, CD service opportunities exist within individual assessment areas in the State of Louisiana.

Community Development Services Louisiana					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Baton Rouge MSA	0	11	0	0	11
Hammond MSA	2	2	0	0	4
Lafayette MSA	0	0	0	0	0
Louisiana Non-MSA	0	0	0	0	0
New Orleans MSA	6	6	4	0	16
Statewide Activities	1	2	6	1	10
Total	9	21	10	1	41
<i>Source: Bank Data (1/1/2021 – 12/31/2023)</i>					

The following are notable examples of CD services specific statewide activities in Louisiana:

- ***Affordable Housing*** – Employees provide technical expertise to public organizations, private organizations, and developers working together as a group to solve affordable housing needs. A state housing organization formed this group as a collaborative effort to aggregate statewide resources for more solutions than what individual organizations could produce.
- ***Community Services*** – An employee served as a Board member for an organization whose mission is to promote access to educational and other opportunities to gain financial wealth for low- and moderate-income individuals.

NEW ORLEANS MSA ASSESSMENT AREA– Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW ORLEANS MSA ASSESSMENT AREA

The New Orleans MSA assessment area includes all 371 census tracts that make up Jefferson, Orleans, and St. Tammany Parishes, three of eight parishes that make up the New Orleans-

Metairie MSA (New Orleans MSA), located in southeast Louisiana. On March 1, 2022, the New Orleans MSA assessment area expanded to include all of Jefferson Parish due to the First Bank and Trust, New Orleans, Louisiana acquisition. Major loan products for the New Orleans assessment area are home mortgage and small business loans.

Economic and Demographic Data

The assessment area's census tracts reflect the following income designations based on 2020 U.S. Census data: 45 low-, 98 moderate-, 90 middle-, 119 upper-income census tracts, and 19 tracts with no income designation. FEMA declared this assessment area as a major disaster area due to severe storms and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area New Orleans MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	371	12.1	26.4	24.3	32.1	5.1
Population by Geography	1,089,348	9.7	26.0	29.1	33.7	1.4
Housing Units by Geography	484,888	9.8	26.8	28.4	33.2	1.8
Owner-Occupied Units by Geography	258,614	5.9	20.9	33.2	39.0	1.0
Occupied Rental Units by Geography	161,664	14.9	36.0	23.8	22.9	2.4
Vacant Units by Geography	64,610	12.6	27.4	21.0	35.3	3.7
Businesses by Geography	185,907	7.4	22.6	28.5	39.6	1.9
Farms by Geography	2,726	6.0	21.2	36.4	35.3	1.1
Family Distribution by Income Level	243,110	24.8	15.1	18.2	41.9	0.0
Household Distribution by Income Level	420,278	27.3	14.2	15.8	42.6	0.0
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$72,053	Median Housing Value			\$242,533
			Median Gross Rent			\$1,054
			Families Below Poverty Level			12.1%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

Economy: According to Moody's Analytics, Precis U.S. Metro – January 2024, the New Orleans MSA's economy slowed at the end of 2023. The recession economy in other countries reduced the demand for refined goods shipped from New Orleans. An economic weakness is the large number of low-paying gaming and tourism combined with few high-technology jobs. The healthcare and construction industries were drivers of hiring despite layoffs from a major employer. Ochsner Health, the largest employer in New Orleans, announced layoffs last year across Louisiana. The Plaquemines LNG facility remains a major driver of construction hiring. According to the U. S. Bureau of Labor Statistics as of December 2023, the New Orleans MSA

assessment area's unemployment rate at 4.1 percent is above the State of Louisiana at 4.0 percent and is above the national average at 3.7 percent. The population, housing and business information below is sourced from New Orleans MSA assessment area specifically rather than the entire New Orleans MSA.

Population: Utilizing data from the U.S. Census Vintage, the population declined by 0.7 percent between July 2022 and July 2023. According to the Census Reporter, the highest category of population distribution by age shows age 30-39 ranging from 14 to 17 percent for the three counties in the New Orleans MSA assessment area, which is similar to the State of Louisiana. The foreign born population ranges from 3.6 for St. Tammany Parish to 11.6 for Jefferson Parish, with the average of the three Parishes slightly higher than the rate for Louisiana at 4.2 percent.

Housing: According to the Census Reporter, the median household income ranges from \$52,322 to \$76,269 for the 3 Parishes in the New Orleans MSA assessment area, with the average above Louisiana at \$55,416. The median housing value ranges from \$261,600 to \$302,700 for the three Parishes in the New Orleans MSA assessment area, which is significantly higher than Louisiana at \$209,200 and below that of the United States at \$320,900. According to RocketHomes, the median housing price of all sold homes between December 2022 and December 2023 declined by 4.2 percent in Jefferson Parish, declined by 3.4 percent in Orleans Parish, and remained stable in St. Tammany Parish.

Business: 2023 D&B data show 220,891 total non-farm businesses in the assessment area, with 93.3 percent reporting gross annual revenues of \$1 million or less. The largest categories by employee size are 1-4 employees at 59.7 percent and 5-9 employees at 35.2 percent. Per Data USA, the largest industries in the New Orleans MSA assessment area are health care and social assistance, educational services, accommodation & food, and retail trade. The highest paying industries are finance and insurance, professional/technical, agriculture/fishing, mining/oil-gas extraction, and utilities.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with 31 institutions having 262 offices serving the community. BankPlus ranks 9th in market share by capturing 1.6 percent of the area's deposits based on the June 30, 2023, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the New Orleans MSA assessment area created varied loan demand for home mortgage, small business, and consumer loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans, and construction loans for affordable single family and rental housing.

Demographic data indicates that a high percentage (39.9 percent) of the assessment area's families receive a designation of low- or moderate-income, with 12.1 percent below the poverty level. This signifies a continued need for CD services. The high percentage of small businesses with revenues of \$1 million or less supports the continued need for economic development. The high percentage of lower income paying jobs supports the need to attract new or expand existing businesses with higher paying jobs in the assessment area. The high percentage (38.5 percent) of low- and moderate-income census tracts and the multiple major disaster area declarations support the need for revitalization and stabilization efforts.

Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant retail banking service need existed for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. A financial inclusion need exists for increased access to consumer and commercial retail banking services to low- and moderate-income borrowers and census tracts. Additionally, a retail banking service need exists for digital products with evolving features and technology built in to improve the customer's financial wellness.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NEW ORLEANS MSA

LENDING TEST

BankPlus demonstrated a low satisfactory record in the New Orleans MSA assessment area regarding the Lending Test. The adequate performance records regarding borrower profile and CD lending lifted the poor geographic distribution to support this conclusion. In addition, the bank made limited use of innovative and flexible lending and demonstrated good lending activity levels in this rated area. Examiners weighed home mortgage loans heavier than small business loans in the New Orleans MSA assessment area.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs in the New Orleans MSA assessment area. Excellent performance regarding home mortgage loans offset by adequate performance regarding small business loans support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the New Orleans MSA assessment area. Home mortgage lending reflects combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 205 total reportable home mortgage loans totaling approximately \$158.6 million. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 0.8 percent market share of the total number and a 2.1 percent market share of the total dollar volume of home mortgage loans.

This volume of activity ranks the bank 30th out of 461 total lenders in the New Orleans assessment area. This ranking lands the bank in the top 6.5 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect adequate responsiveness to assessment area credit needs in the New Orleans MSA assessment area. For 2022, the bank originated 77 total reportable small business loans totaling approximately \$22.0 million (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 0.2 percent market share of the total number and a 1.6 percent market share of the total dollar volume of small business loans.

This volume of activity ranks the bank 41st out of 127 total lenders in the New Orleans assessment area. This ranking lands the bank in the top 32.3 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects poor penetration throughout the New Orleans MSA assessment area. Poor records regarding home mortgage loans outweighed adequate records regarding small business loans to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor performance in the New Orleans MSA assessment area. Poor performance in moderate-income geographies outweighed adequate performance in low-income geographies to support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is slightly below the aggregate data by 1.3 percentage point, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level falls 8.7 percentage points lower than aggregate data, reflecting a poor level. The bank's performance in moderate-income census tracts receive more weight given the greater demographics evidencing more lending opportunities.

Geographic Distribution of Home Mortgage Loans New Orleans MSA Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.9	5.4	9	4.1	4,094	3.1
Moderate	20.9	17.9	20	9.2	28,575	21.6
Middle	33.2	31.7	48	22.1	17,210	13.0
Upper	39.0	43.8	135	62.2	72,023	54.4
Not Available	1.0	1.1	5	2.3	10,588	8.0
Totals	100.0	100.0	217	100.0	132,490	100.0
Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the New Orleans MSA assessment area. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is slightly below the aggregate data by 3.1 percentage point, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level rises 0.7 percentage points higher than aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Business Loans New Orleans MSA Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	7.4	6.1	4	3.0	761	2.2
Moderate	22.6	21.3	29	22.0	8,897	25.5
Middle	28.5	30.0	36	27.3	9,606	27.6
Upper	39.6	40.8	60	45.5	14,845	42.6
Not Available	1.9	1.7	3	2.3	735	2.1
Totals	100.0	100.0	132	100.0	34,844	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding both home mortgage outweighed poor records regarding small business loans to support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the New Orleans MSA assessment area. Adequate performance to low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is lower than the aggregate data by 1.6 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 7.0 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level New Orleans MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	24.8	5.3	8	3.7	926	0.7
Moderate	15.1	16.2	20	9.2	3,139	2.4
Middle	18.2	19.3	20	9.2	5,094	3.8
Upper	41.9	38.6	121	55.8	53,778	40.6
Not Available	0.0	20.5	48	22.1	69,554	52.5
Totals	100.0	100.0	217	100.0	132,490	100.0
<i>Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available Due to rounding, totals may not equal 100.0 percent</i>						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects poor performance in the New Orleans MSA assessment area. Poor performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending to businesses with gross annual revenues of \$1 million or less falls 10.6 percentage points below the aggregate performance, reflecting poor performance. While the New Orleans MSA assessment area reflects poor performance as the most heavily weighted individual assessment area, the higher performances in the Baton Rouge MSA and Louisiana Non-MSA assessment areas contributed to lifting the State of Louisiana to adequate performance for this performance factor.

Distribution of Small Business Loans by Gross Annual Revenue Category New Orleans MSA Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	92.1	50.8	53	40.2	13,197	37.9
>\$1,000,000	2.3	--	18	13.6	5,873	16.9
Revenue Not Available	5.6	--	61	46.2	15,774	45.3
Totals	100.0	100.0	132	100.0	34,844	100.0
<i>Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data; "--" data not available; Due to rounding, totals may not equal 100.0 percent</i>						

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in the New Orleans MSA assessment area in order to serve assessment area credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion.

The dollar figure equates to 58.5 percent of the bank's overall innovative or flexible lending in the State of Louisiana which is below the 64.6 percent dollar volume of home mortgage and CRA reportable loans for the New Orleans MSA assessment area. Please refer to the discussion under the State of Louisiana for additional details regarding the innovative or flexible lending practices in the New Orleans MSA assessment area.

Community Development Loans

The institution made an adequate level of CD loans in the New Orleans MSA assessment area. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, BankPlus originated 18 CD loans totaling approximately \$87.3 million in the New Orleans MSA assessment area. By dollar volume, this equates to 63.2 percent (or 66.3 of total CD loans less statewide activities) of the bank's adequate level of CD lending in the State of Louisiana as compared to the 64.6 percent of the bank's home mortgage and CRA data reportable loans attributed to this assessment area.

The following point notes an example of the bank's CD lending in the New Orleans MSA assessment area.

- ***Affordable Housing*** - The bank originated a loan totaling \$4.0 million for the purchase and redevelopment of an apartment with the developer using Low-Income Tax Credits, which restricts rents affordable to low- and moderate-income individuals. The apartment also accepts New Orleans housing vouchers to help with rent payments.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the New Orleans MSA assessment area regarding the Investment Test. The adequate level of qualified investments and the adequate responsiveness to CD needs outweighed no use of complex investments to support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified investments in the New Orleans MSA assessment area. The table for the State of Louisiana shows that BankPlus made 38 qualified investments totaling approximately \$3.5 million in the New Orleans MSA assessment area. By dollar volume, this equates to 42.3 percent of the overall adequate level of qualified investments in the State of Louisiana as compared to 64.1 percent of total deposits attributed to this assessment area.

The following is an example of a key investment in the New Orleans MSA assessment area.

- ***Community Service*** - The bank purchased a municipal bond totaling \$500,000 for the purpose of enhancing schools in low- and moderate-income school districts.

Responsiveness to Credit and Community Development Needs

BankPlus' CD activities show adequate responsiveness through use of investments that directly address identified needs in the New Orleans MSA assessment area. As noted in the investment table for the State of Louisiana, the New Orleans MSA assessment area shows adequate responsiveness to CD needs by the dollar amount in three of the four CD purposes categories, with an emphasis on affordable housing.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record in the New Orleans MSA assessment area regarding the Service Test. The reasonably accessible delivery systems, changes in branch locations, and reasonableness of hours and services outweighed the poor level regarding the bank's CD services to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the New Orleans MSA assessment area. Reasonably accessible branch distribution and alternative delivery systems support this conclusion. The New Orleans MSA assessment area reflects consistent conclusion to the institution's Accessibility of Delivery System performance.

The bank makes its full-service offices reasonably accessible to essentially all portions of the New Orleans MSA assessment area considering performance context. The adequate record of branches in moderate-income lifted the poor record of branches in low-income to support the reasonably accessible conclusion.

The bank's branch distribution in low-income census tracts falls 9.7 percentage points above the population of low-income census tracts, reflecting poor performance. In moderate-income census tracts, the bank's branch distribution falls 1.0 percentage points below the population percentage, reflecting adequate performance. The bank's branch distribution is spread over all three Parishes that make up the assessment area, with access to a large number of low- and moderate-income census tracts in the urban New Orleans MSA assessment area.

Branch and ATM Distribution by Geography Income Level New Orleans MSA Assessment Area												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	45	12.1	105,757	9.7	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	98	26.4	283,166	26.0	2	25.0	2	25.0	2	25.0	0	0.0
Middle	90	24.3	317,535	29.1	1	12.5	1	12.5	0	0.0	0	0.0
Upper	119	32.1	367,112	33.7	5	62.5	5	62.5	6	75.0	4	100.0
NA	19	5.1	15,778	1.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	371	100.0	1,089,348	100.0	8	100.0	8	100.0	8	100.0	4	100.0
<i>Source: 2020 U.S Census Data; Bank Data</i>												

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the New Orleans MSA assessment area. The adequate performance in ATMs/ITMs within low- and moderate-income census tracts outweighs the poor performance in digital product usage in low- and moderate-income census tracts.

The adequate record of ATMs in moderate-income lifted the poor record of ATMs in low-income to support the reasonably accessible conclusion. The bank's ATMs/ITMs in low-income census tracts falls 9.7 percentage points below the population of low-income census tracts, reflecting poor performance. The bank's ATMs/ITMs in moderate-income census tracts falls 1.0 percentage points below the population percentage, reflecting adequate performance. The bank's ATMs/ITMs distribution is spread over all three Parishes within the assessment area, with access to a large number of low- and moderate-income census tracts in this urban assessment area.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the New Orleans MSA assessment area on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 22.6 percent compares significantly below the population percentage in low- and moderate- income census tracts at 35.7 percent.

Refer to the Service Test section for the state for details on digital banking services that provide banking access to low- and moderate-income people and tracts.

Changes in Branch Locations

This is a new assessment area since the previous evaluation. To the extent changes have been made, the institution's record of opening and closing of branches in the New Orleans MSA assessment area has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Branch changes resulted in a gain of two branches opening in moderate-income census tracts in the New Orleans MSA assessment area.

The branch openings in moderate-income census tracts were from the acquisition of the First Bank and Trust, New Orleans, Louisiana.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the New Orleans MSA assessment area, particularly low- or moderate-income geographies or individuals. The New Orleans MSA assessment area reflects product offerings, services, and branch hours consistent with the State of Louisiana.

The bank's branch has the product offerings and services are consistent with the State of Louisiana. Branch hours are open at least from Monday through Friday 8:30 a.m. to 4:00 p.m. An ITM extends weekday and Saturday hours at one location with this machine.

Community Development Services

The institution has a limited level of CD services in the New Orleans MSA assessment area. Poor performance regarding the extent of CD services outweighed adequate responsiveness of CD services to available opportunities primarily support this conclusion.

The table in the State of Louisiana section shows that the bank provided 16 CD services since the previous evaluation in the New Orleans MSA assessment area. This number equates to an average of 0.7 CD services, per office, per year, since the previous evaluation, thereby reflecting a poor level. The bank averaged 10 branches for 2.2 years on average since the prior evaluation.

The following are examples of CD services specific to the New Orleans MSA assessment area:

- ***Affordable Housing*** - Employees provided technical assistance to organizations in preparing and submitting applications for a PGP through FHLB of Dallas. The PGP provides a three to one match of BankPlus contributions to support community organizations with a mission for affordable housing.
- ***Community Services*** - A bank employee served as a Board member to an organization that provides health care to under insured and uninsured through a medical clinic. Two mobile medical units provide mostly free health screenings. The organization primarily benefits low- and moderate-income individuals that rely on these affordable services.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate

lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Baton Rouge MSA	Consistent	Exceeds	Consistent
Hammond MSA	Consistent	Consistent	Above
Lafayette MSA	Consistent	Consistent	Below
Louisiana Non-MSA	Consistent	Consistent	Below

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of BankPlus's operations and activities. The demographic data for the limited-scope assessment areas is in the appendices.

Baton Rouge MSA Assessment Area

The bank's Baton Rouge MSA assessment area consists of all of Acension, East Baton Rouge, Livingston, and Pointe Coupee Parishes. BankPlus operates five branches in this assessment area, three in moderate-income census tracts and two in middle-income census tracts. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance above the institution. The availability of alternative delivery systems also demonstrated inconsistent performance with the institution, with performance above the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	98	29,109
Small Business Loans	79	13,358
CD Loans	14	26,195
Investments	32	4,203
CD Services	11	--

Hammond MSA Assessment Area

The bank's Hammond MSA assessment area consists of all of Tangipahoa Parish. BankPlus operates two branches in this assessment area, one in a low-income census tract and one in a moderate-income census tract. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance above the institution. The availability of alternative delivery systems also demonstrated inconsistent performance with the institution, with performance above the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	31	8,013
Small Business Loans	47	6,520
CD Loans	7	8,849
Investments	15	607
CD Services	4	--

Lafayette MSA Assessment Area

The bank's Lafayette MSA assessment area consists of all of Lafayette Parish. BankPlus operates one branch in this assessment area in an upper-income census tract. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	4	1,794
Small Business Loans	8	3,408
CD Loans	2	9,367
Investments	3	10
CD Services	0	--

Louisiana Non-MSA Assessment Area

The bank's Louisiana Non-MSA assessment area consists of all of St. Landry Parish. BankPlus operates one branch in this assessment area in a moderate-income census tract. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	6	354
Small Business Loans	3	536
CD Loans	0	0
Investments	4	8
CD Services	0	--

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate
Baton Rouge MSA	98	29,109	70.5	21,073	5.7	5.1	3.7	15.4	19.4	13.9	38.9	37.8	40.9	38.2	35.7	39.5	1.7	2.0	2.0
Hammond MSA	31	8,013	22.3	3,607	5.4	3.2	4.3	12.2	6.5	6.7	51.1	48.4	46.2	30.5	38.7	41.3	0.7	3.2	1.5
Lafayette MSA	4	1,794	2.9	7,082	2.3	25.0	1.6	16.6	0.0	14.2	18.7	0.0	20.6	62.3	75.0	63.5	0.0	0.0	0.0
LA Non-MSA	6	354	4.3	1,316	5.4	0.0	2.7	25.0	0.0	19.9	39.8	83.3	38.5	29.1	16.7	38.3	0.7	0.0	0.6
Total	139	39,271	100.0	33,078	5.0	5.0	3.3	16.0	15.1	13.4	36.2	41.0	37.0	41.7	36.7	44.8	1.2	2.2	1.5
Source: 2020 U.S. Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income census tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggre gate	% Businesses	% Bank Loans	Aggre gate	% Businesses	% Bank Loans	Aggre gate	% Businesses	% Bank Loans	Aggre gate	% Businesses	% Bank Loans	Aggre gate
Baton Rouge MSA	79	13,358	57.7	20,780	9.2	7.6	7.4	18.3	20.3	16.9	34.8	27.8	34.0	36.0	43.0	40.0	1.8	1.3	1.7
Hammond MSA	47	6,520	34.3	3,061	11.4	14.9	10.9	16.1	2.1	15.1	43.6	59.6	43.4	27.8	23.4	29.7	1.0	0.0	0.9
Lafayette MSA	8	3,408	5.8	10,588	5.4	0.0	4.2	15.6	12.5	13.9	20.7	0.0	22.0	58.3	87.5	59.9	0.0	0.0	0.0
LA Non-MSA	3	536	2.2	1,743	6.1	0.0	5.6	26.1	66.7	25.2	39.7	0.0	39.1	26.2	33.3	29.3	1.9	0.0	0.8
Total	137	23,822	100.0	36,172	8.3	9.5	6.7	17.8	14.6	16.3	32.3	36.5	31.5	40.3	38.7	44.4	1.3	0.7	1.1
Source: 2022 D&B Data; 1/1/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Baton Rouge MSA	98	29,109	70.5	21,073	23.3	6.1	8.7	16.0	7.1	20.9	17.8	10.2	20.1	43.0	38.8	30.6	0.0	37.8	19.7
Hammond MSA	31	8,013	22.3	3,607	26.2	3.2	4.7	15.0	6.5	15.9	16.7	25.8	25.1	42.1	32.3	32.6	0.0	32.3	21.5
Lafayette MSA	4	1,794	2.9	7,082	22.1	0.0	5.2	13.7	0.0	17.0	16.3	25.0	20.6	47.9	75.0	36.1	0.0	0.0	21.1
LA Non-MSA	6	354	4.3	1,316	28.0	0.0	3.6	14.5	0.0	15.0	20.3	0.0	18.8	37.2	83.3	42.8	0.0	16.7	19.8
Total	139	39,271	100.0	33,078	23.7	5.0	7.3	15.3	6.5	19.3	17.5	13.7	20.7	43.5	40.3	32.5	0.0	34.5	20.2
Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Baton Rouge MSA	79	13,358	57.7	20,780	90.9	62.0	50.7	2.4	24.1	6.7	13.9
Hammond MSA	47	6,520	34.3	3,061	91.6	48.9	54.8	1.9	4.3	6.6	46.8
Lafayette MSA	8	3,408	5.8	10,588	90.6	37.5	47.1	3.0	0.0	6.4	62.5
LA Non-MSA	3	536	2.2	1,743	89.5	66.7	52.3	2.5	0.0	8.0	33.3
Total	137	23,822	100.0	36,172	90.8	56.2	50.1	2.5	15.3	6.6	28.5
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent											

MISSISSIPPI

CRA RATING FOR LOUISIANA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSISSIPPI

BankPlus designated four assessment areas in the State of Mississippi as noted in the table below. All of the bank's assessment areas in Mississippi conform to the CRA regulatory requirements.

Description of Assessment Areas Mississippi			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Biloxi MSA	Harrison	82	1
Jackson MSA	Copiah, Hinds, Holmes, Madison, Rankin, Yazoo	151	27
Memphis MSA	DeSoto	41	5
Mississippi Non-MSA	Bolivar, Claiborne, Clarke, Grenada, Humphreys, Lafayette, Lauderdale, Lawrence, Lee, Leflore, Lincoln, Marion, Newton, Oktibbeha, Pearl River, Pike, Sunflower, Walthall, Wayne	182	24
Source: Bank Data; 2020 U.S. Census Data			

SCOPE OF EVALUATION – MISSISSIPPI

Of the four assessment areas in Mississippi, examiners applied full-scope procedures to the Jackson MSA assessment area since this assessment area includes the highest percentage of the bank's loans, deposits, and branches in Mississippi. Examiners applied limited-scope procedures to the other Mississippi assessment areas. Major loan products in Mississippi are home mortgage, small business, and small farm loans, with the exception of the Biloxi MSA assessment area with home mortgage and small business loans as major loan products.

Examiners considered the following loans granted inside the bank's Mississippi assessment areas as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:

- 2021: 2,499 loans totaling \$505,482,390
- 2022: 1,891 loans totaling \$430,239,257
- 2023: 1,609 loans totaling \$297,663,202

Small Business Loans:

- 2021: 3,238 loans totaling \$198,632,000
- 2022: 1,440 loans totaling \$169,056,000
- 2023: 1,503 loans totaling \$166,582,000

Small Farm Loans:

- 2021: 642 loans totaling \$46,037,000
- 2022: 519 loans totaling \$49,176,000
- 2023: 509 loans totaling \$45,354,000

As suggested by the above figures, examiners gave more weight to home mortgage loans when arriving at applicable conclusions given the higher dollar volume of loans.

The following table shows that the Jackson MSA assessment area generated the largest percentage of the bank's Mississippi loans, deposits, and branches. Consequently, examiners weighed records in the Jackson MSA assessment area heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches Mississippi						
Assessment Area	Loans		Deposits*		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Biloxi MSA	18,613	1.0	32,661	0.7	1	1.8
Jackson MSA	1,126,446	59.0	2,731,702	61.9	27	47.4
Memphis MSA	124,857	6.5	295,312	6.7	5	8.8
Mississippi Non-MSA	638,306	33.5	1,352,587	30.7	24	42.0
Total	1,908,222	100.0	4,412,262	100.0	57	100.0
<i>Source: 2021-2023 HMDA Reported Data; 2021-2023 CRA Reported Data; FDIC Summary of Deposits (6/30/2023); * Active full-service branches only as of the CRA evaluation date as BankPlus closed branches after the FDIC Summary of Deposits (6/30/2023); Due to rounding, totals may not equal 100.0 percent</i>						

CONCLUSIONS ON PERFORMANCE CRITERIA IN MISSISSIPPI

LENDING TEST

BankPlus demonstrated a high satisfactory record in the State of Mississippi regarding the Lending Test. The good performances regarding borrower profile and geographic distribution outweighed the adequate level of CD lending to support this conclusion. The bank also exhibited excellent lending levels and makes limited use of innovative or flexible lending in this state.

Conclusions regarding the institution's performance in the State of Mississippi were consistent with the conclusions for the Memphis MSA, and Mississippi Non-MSA assessment areas, with inconsistent conclusions for the Biloxi and Jackson MSA assessment area below the results for the rated area.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. Excellent performance regarding home mortgage, small business and small farm loans support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. Home mortgage lending reflects combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 1,944 total reportable home mortgage loans totaling approximately \$451.8 million. These total number and dollar amount of loans reflects full calendar year data reported for both banks and not separate loan application registers with additional mortgage activities. Also, data may have changed since the time of this CRA evaluation. BankPlus captured a 4.6 percent market share of the total number and a 4.7 percent market share of the total dollar volume of home mortgage loans.

This volume of activity ranks the bank 4th out of 554 total lenders in the bank's Mississippi assessment areas. This ranking lands the bank in the top 0.7 percent of lenders reporting such loans in the bank's Mississippi assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. For 2022, the bank originated 1,159 total reportable small business loans totaling approximately \$127.0 million inside its Mississippi assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 3.4 percent market share of the total number and an 8.7 percent market share of the total dollar volume of small business loans.

This volume of activity ranks the bank 7th out of 148 total lenders in the bank's Louisiana assessment areas. This ranking lands the bank in the top 4.7 percent of lenders reporting such loans in the bank's Mississippi assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent responsiveness to assessment area credit needs in the State of Mississippi. For 2022, the bank originated 449 total reportable small farm loans totaling approximately \$40.9 million inside its Mississippi assessment areas (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). These totals reflect 2022 reported data that may have changed since the time of this CRA evaluation. BankPlus captured a 28.9 percent market share of the total number of small farm loans and a 37.5 percent market share of the total dollar volume of small farm loans.

This volume of activity ranks the bank 1st out of 34 total lenders in the bank's Mississippi assessment areas. This ranking lands the bank in the top of lenders reporting such loans in the bank's Mississippi assessment areas. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the State of Mississippi. The Jackson MSA assessment area demonstrated consistent performance, while the Biloxi MSA, Memphis MSA, and Mississippi Non-MSA assessment areas demonstrated inconsistent performance below that of the rated area.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes. The Jackson MSA, Memphis MSA, and Mississippi Non-MSA assessment areas demonstrated consistent performance with the State of Mississippi. The Biloxi MSA assessment area demonstrated inconsistent performance below that noted for the State of Mississippi.

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in order to serve assessment area credit needs in the State of Mississippi. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its assessment areas when arriving at this conclusion.

The table below shows that since the previous evaluation, the bank originated 5,091 innovative or flexible loans totaling approximately \$89.3 million in the State of Mississippi. This dollar figure equates to 74.5 percent of the bank's overall use of innovative or flexible loans which is comparable to the 71.6 percent dollar volume of home mortgage and CRA reportable loans for the State of Mississippi. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the State of Mississippi.

Innovative or Flexible Lending Programs Mississippi										
Assessment Area	Credit Plus/ Other Small Dollar Loans		AHP/HOSP		FHA/USDA/VA		SBA/SBB/FSA/ MS and USDA Small Business Programs		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Biloxi MSA	16	20	0	0	2	537	3	9,270	21	9,827
Jackson MSA	2,583	3,170	33	3,817	103	22,576	28	11,797	2,747	41,360
Memphis MSA	116	138	4	512	13	3,128	1	171	134	3,949
Mississippi Non-MSA	2,099	2,707	13	903	48	9,018	29	21,484	2,189	34,112
Total	4,814	6,035	50	5,232	166	35,259	61	42,722	5,091	89,248
<i>Source: Bank Data</i>										

Community Development Loans

The institution has an adequate level of CD loans in the State of Mississippi. Its extent, or dollar volume, of CD loans outweighed the CD loans' good responsiveness to support this conclusion. Performance in the Memphis and Biloxi assessment areas proved consistent with the overall rated area, while inconsistent performance in the Jackson MSA assessment area was below the State of Mississippi conclusion and in the Mississippi Non-MSA assessment area was above the State of Mississippi conclusion.

The following table shows that, since the previous evaluation, the bank granted 172 CD loans totaling approximately \$303.9 million in this state. The dollar amount equates to 58.9 percent of the bank's overall excellent level of CD loans as compared to the 71.6 percent of overall HMDA and CRA data reportable loans attributed to this state.

Community Development Loans Mississippi										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Biloxi MSA	0	0	0	0	0	0	0	0	0	0
Jackson MSA	10	4,012	0	0	13	28,692	44	51,577	67	84,281
Memphis MSA	0	0	0	0	2	1,858	0	0	2	1,858
Mississippi Non-MSA	9	4,172	1	1,121	12	63,643	62	114,082	84	183,018
Statewide	1	2,931	2	3,160	4	10,976	12	17,655	19	34,722
Total	20	11,115	3	4,281	31	105,169	118	183,314	172	303,879
<i>Source: Bank Data</i>										

Besides their extent, the CD loans reflect good responsiveness to the state's CD needs given all four CD purpose represented, with significant impact particularly from the majority of the dollar volume in Revitalize and Stabilize. While there are no CD loans in the one assessment area for the State of

Mississippi, refer to pages within the State of Mississippi showing investment and CD services in the State of Mississippi's one assessment area to support responsiveness to CD needs.

The following points discuss the bank's CD lending activities in the broader statewide area of Mississippi.

- **Community Service** – The bank originated a loan totaling \$1.1 million to finance the acquisition of a building for a clinic providing affordable healthcare in a rural area, primarily to benefit low- and moderate-income individuals. The clinic is located in a moderate-income tract.
- **Revitalize or Stabilize** – The bank originated a loan totaling \$4.5 million to finance the operations of a farm located in a distressed-middle income tract during the pandemic. The loan assisted in retaining jobs and residents in the distressed middle-income area.

INVESTMENT TEST

BankPlus demonstrated a high satisfactory record in the State of Mississippi regarding the Investment Test. The significant level of qualified investments and the good responsiveness to CD needs outweighed no use of complex investments to support this conclusion. The Jackson MSA assessment area reflects consistent performance with the overall State of Mississippi; however, the Biloxi MSA, Memphis MSA, and Mississippi Non-MSA assessment areas reflect inconsistent performance as it falls below the overall performance for the state.

Investment and Grant Activity

The bank has a significant level of qualified CD investment and grants, in the State of Mississippi. The table below shows that BankPlus made 609 qualified investments totaling approximately \$44.1 million in the State of Mississippi. By dollar volume, this equates to 13.7 percent (or 83.4 percent of total qualified investments less regional activities) of the bank's excellent level of qualified investments as compared to 75.8 percent of total deposits attributed to this rated area.

Qualified Investments by Assessment Area Mississippi										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Biloxi MSA	3	27	10	803	3	405	0	0	16	1,235
Jackson MSA	14	1,353	165	2,221	40	10,426	5	19	224	14,019
Memphis MSA	7	858	23	3,031	2	404	0	0	32	4,293
Mississippi Non-MSA	16	587	235	13,825	35	6,596	4	20	290	21,028
Statewide Activities	8	12	21	324	16	3,089	2	50	47	3,475
Total	48	2,837	454	20,204	96	20,920	11	89	609	44,050
Source: Bank Data										

Since BankPlus' investments addressed community credit needs inside the bank's assessment areas within the State of Mississippi, statewide Mississippi activities includes investments in areas outside of the bank's designated assessment areas, but within the State of Mississippi. The following point provides an example of the bank's qualified investment activities in the broader statewide area of Mississippi.

- ***Economic Development*** - The bank invested \$3.0 million in municipal bonds to fund economic development projects across the State of Mississippi. The bonds help to finance various capital improvements and improve highways in low- and moderate-income areas.

Responsiveness to Credit and Community Development Needs

BankPlus exhibits good responsiveness to credit and CD needs through use of investments that directly address identified needs in the State of Mississippi. The previous table shows responsiveness to CD needs by the dollar amount in all four CD purpose categories, most investment funds financed economic development.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record for the State of Mississippi regarding the Service Test. The adequate levels regarding the bank's CD services, changes in branch locations, and reasonableness of hours and services outweighed the accessible delivery systems to support this conclusion. The Jackson MSA, Memphis MSA, and Mississippi Non-MSA assessment areas reflect performance consistent with the state level. The Biloxi MSA assessment area reflects inconsistent performance above the state level.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the bank's assessment areas in the State of Mississippi. Accessible branch distribution outweighed reasonably accessible alternative accessible alternative delivery systems to support this conclusion. The State of Mississippi reflects an inconsistent conclusion to the institution's Accessibility of Delivery System performance, with performance above the institution.

The bank makes its full-service offices accessible to essentially all portions of the institution's assessment areas in the State of Mississippi. The bank's good performance in low-income census tracts lifted the bank's adequate performance of branches in moderate-income census tracts to support the accessible conclusion.

The bank's branch distribution in low-income census tracts rises 9.6 percentage points above the population percentage, reflecting good performance. In moderate-income census tracts, the bank's

branch distribution rises 3.8 percentage points above the population percentage, reflecting adequate performance. More weight was given to performance in low-income census tracts given the bank's percentage of branches in low-income census tracts is more than double the percentage of population in low-income census tracts.

Branch and ATM Distribution by Geography Income Level Mississippi												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	48	10.5	125,851	7.9	10	17.5	12	12.8	1	33.3	2	20.0
Moderate	92	20.2	300,965	19.0	13	22.8	17	18.1	0	0.0	2	20.0
Middle	158	34.6	573,556	36.2	12	21.1	19	20.2	0	0.0	4	40.0
Upper	148	32.5	576,479	36.3	22	38.6	46	48.9	2	66.7	2	20.0
NA	10	2.2	9,287	0.6	0	0.0	0	0.0	0	0.0	0	0.0
Totals	456	100.0	1,586,138	100.0	57	100.0	94	100.0	3	100.0	10	100.0
Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0 percent												

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the bank's assessment areas in the State of Mississippi. The bank's adequate performance for ATMs/ITMs in low- and moderate-income census tracts and adequate performance for digital banking channels in low- and moderate-income census tracts supported the reasonably accessible conclusion.

The bank's ATMs/ITMs in low-income census tracts rises 4.9 percentage points above the population of low-income census tracts, reflecting adequate performance. In moderate-income census tracts, the bank's ATMs/ITMs falls 0.9 percentage points below the population percentage, reflecting adequate performance.

Refer to the Service Test section for the overall bank for details on digital banking services that provide banking access to low- and moderate-income people and census tracts. The bank's COVID-19 response extended financial assistance to help many people avoid serious financial consequences during the pandemic.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the State of Mississippi on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 24.5 percent compares reasonable to the population percentage in low- and moderate- income census tracts at 26.9 percent.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the State of Mississippi has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and low- and moderate-income individuals.

The bank closed more branches than opened in low- and moderate-income census tracts in the State of Mississippi; however, this evaluation considers the impact of these branch changes to low- and moderate-income areas when forming conclusions.

The sole branch opened in a low-income tract is located in the Biloxi, Mississippi assessment area, with this opening from the acquisition of First Bank and Trust, New Orleans, Louisiana. All four branches closed in low- and moderate-income census tracts occurred from consolidating acquired branches with existing branches. While BankPlus continues to operate with a percentage of active branches higher compared to the percentage of population in low-income and in moderate-income census tracts, individual assessment areas in rural locations where branches are closed without physical branches are impacted from a lack of access to remote services as noted below.

Of the four branches closed in low- and moderate-income census tracts, only the branch closed in Shubuta was replaced with an ITM due to its rural location. Of the other three branches closed, two were located in the urban Jackson MSA assessment area (Flowood and Jackson, Mississippi) and one was located in the rural Mississippi Non-MSA assessment area (Picayne, MS). BankPlus has active branch locations in each of the three cities (Flowood, Jackson, and Picayne). The accounts of customers are moved to nearby branches. Customers have access to the bank's alternative delivery systems to reduce the impact of the branch closing. Refer to the alternative delivery systems section for the overall institution in this CRA evaluation for more information.

The Shibuta branch closing (Mississippi Non-MSA assessment area) occurred in December 2023, replaced with an ITM at the same location. The Shibuta branch did not have a lender for many years at the location due to the loan volume. Prior to the Shibuta branch closing, lenders at the closest two branches (Waynesboro and Quitman) scheduled appointments for loan services at the Shibuta branch for Shibuta customers who were unable or preferred not to travel to the Waynesboro or Quitman branches. After the Shibuta branch closing, these same lenders would meet Shibuta customers upon customer requests for loan services at offsite locations. The Shibuta branch was located in Clarke County, the same county in which the Quitman branch is located, and the Waynesboro branch is in Wayne County, bordering Clarke County to the South.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Mississippi, particularly low- or moderate-income geographies or individuals. The State of Mississippi reflects product offerings, services, and branch hours generally consistent with discussion at the institution level.

The bank's branches have the same product offerings and services, and branch locations have similar hours. Branch hours are at least Monday to Friday from 9:00 a.m. to 4:00 p.m. for all locations except for two branches. However, both of these branches have extended lobby hours on Fridays. Approximately 47.4 percent (27 of 57 branches) of the bank's locations have 7:00 a.m. to 7:00 p.m. drive-up hours Monday through Friday, in addition to Saturday drive-up hours. Approximately 35 ITMs extend weekday and Saturday hours at locations with these machines. Branch hours vary slightly across branches and almost all branches have extended drive-up hours, resulting in branch hours also being consistent with the institution considering both lobby and drive-up hours.

The bank's branch in Pickens, Mississippi operates with the addition of an ITM since the prior evaluation, with the benefits to the community mentioned above such as extended hours and the ability to communicate with remote bankers on digital screens.

Community Development Services

The institution has an adequate level of CD services for the State of Mississippi. Adequate performance regarding the extent of CD services and responsiveness of CD services to available opportunities primarily support this conclusion.

The following table shows that the bank provided 271 CD services since the previous evaluation. This number equates to an average of 1.4 CD services, per office, per year, since the previous evaluation, thereby reflecting an adequate level. The bank averaged 66 branches for 2.9 years on average since the prior evaluation.

In addition to the extent of services, CD services reflect adequate responsiveness to available opportunities as illustrated by their level of addressing identified CD needs in the bank's assessment areas. Most CD services help provide community services targeted to low- and moderate-income individuals. Additional opportunities exist to revitalize or stabilize low- and moderate-income areas or FEMA designated disaster areas given the number of these tracts in the institution's wide geographic area for the State of Mississippi.

Of the 68 CD services in the Regional rated area covering two to four rated areas (including the State of Mississippi), many are virtual financial education classes with up to 47 participants. However, CD service opportunities exist within individual assessment areas in the State of Mississippi.

Community Development Services Mississippi					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Biloxi MSA	4	0	0	0	4
Jackson MSA	8	119	18	0	145
Memphis MSA	4	11	1	0	16
Mississippi Non-MSA	8	60	7	0	75
Statewide Activities	16	10	5	0	31
Total	40	200	31	0	271
<i>Source: Bank Data (1/1/2021 – 12/31/2023)</i>					

The following are notable examples of CD services specific statewide activities in Mississippi:

- ***Affordable Housing*** - Employees provided technical assistance to organizations in preparing and submitting applications for a PGP through FHLB of Dallas. The PGP provides a 3:1 match of BankPlus contributions to support community organizations with a mission for affordable housing.
- ***Community Services*** – An employee served as a Board member for a statewide organization whose mission is to promote access to affordable quality childcare, primarily to benefit low- and moderate-income families.

JACKSON MSA ASSESSMENT AREA– Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN JACKSON MSA ASSESSMENT AREA

The Jackson MSA assessment area includes all 151 census tracts that make up Copiah, Hinds, Holmes, Madison, Rankin, and Yazoo Counties, 6 of the 7 counties that make up the Jackson, Mississippi MSA (Jackson MSA), located in central Mississippi. Major loan products for the Jackson MSA assessment area are home mortgage, small business, and small farm loans.

Economic and Demographic Data

The assessment area’s census tracts reflect the following income designations based on 2020 U.S. Census data: 24 low-, 35 moderate-, 46 middle-, 44 upper-income census tracts, and 2 tracts with no income designation. FEMA declared this assessment area as a major disaster area due to severe storms and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Jackson MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	151	15.9	23.2	30.5	29.1	1.3
Population by Geography	566,029	11.0	21.0	33.2	34.4	0.4
Housing Units by Geography	240,402	13.3	22.3	33.0	30.7	0.6
Owner-Occupied Units by Geography	140,829	7.2	15.8	37.4	39.4	0.1
Occupied Rental Units by Geography	69,325	23.0	31.2	25.6	18.7	1.6
Vacant Units by Geography	30,248	19.7	32.3	29.2	18.0	0.8
Businesses by Geography	56,699	8.9	19.3	29.4	39.1	3.3
Farms by Geography	1,873	5.7	14.5	33.8	45.0	1.1
Family Distribution by Income Level	138,470	22.8	16.1	19.0	42.1	0.0
Household Distribution by Income Level	210,154	24.9	15.6	16.6	42.8	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$67,202	Median Housing Value			\$141,472
			Median Gross Rent			\$875
			Families Below Poverty Level			12.1%
Source: 2020 U.S. Census Data; 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

Economy: According to Moody’s Analytics, Precis U.S. Metro – April 2024, the Jackson MSA’s economy is a mix of positive economic indicators and challenges. Job growth in healthcare was a key driver in helping the economy. The Jackson MSA retains jobs as it has the highest education attainment in the State of Mississippi. Supply chain disruptions have lowered the production of automobiles, which comprises one-third of the Jackson MSA’s factory payrolls. The Jackson MSA continues to lose population but at a slower decline recently. According to the U. S. Bureau of Labor Statistics as of December 2023, the Jackson MSA assessment area’s unemployment rate ranges from 2.3 percent in Rankin County to 5.4 percent in Holmes County percent compared to the State of Mississippi at 3.2 percent and consistent with the national average at 3.7 percent. The population, housing and business information below is sourced for the entire Jackson MSA since six or seven counties are included.

Population: Utilizing data from the U.S. Census Vintage, the population declined by 0.1 percent between July 2022 and July 2023. According to the Census Reporter, the population distribution age shows age 20 – 29, age 30-39, and age 40-49 at 13 percent which is the similar to percentages for the nation. The foreign-born population represents 2.6 percent, below the rate for the nation at 13.6 percent.

Housing: According to the Census Reporter, the median household income of \$58,064 is below United States at \$74,755. The median housing value at \$188,700 is significantly below that of the United States at \$320,900. According to Redfin, the median housing price of all sold homes

decreased by 17.5 percent between December 2022 and December 2023.

Business: 2023 D&B data show 90,576 total non-farm businesses in the assessment area, with 91.6 percent reporting gross annual revenues of \$1 million or less. The largest categories by employee size are 1-4 employees at 59.4 percent and 5-9 employees at 35.2 percent. Per Data USA, the largest industries in the assessment area are health care and social assistance, educational services, and retail trade. The highest paying industries are professional & technical, mining & oil-gas extraction, and utilities.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with 31 institutions having 199 offices serving the community. BankPlus ranks 3rd in market share by capturing 15.6 percent of the area's deposits based on the June 30, 2023, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Jackson MSA assessment area created varied loan demand for home mortgage, small business, small farm, and consumer loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage, small business loans, small farm loans, and consumer loans.

Demographic data indicates that a high percentage (38.9 percent) of the assessment area's families receive a designation of low- or moderate-income, with 12.1 percent below the poverty level. This signifies a continued need for CD services. The high percentage of small businesses with revenues of \$1 million or less supports the continued need for economic development. The high percentage (39.1 percent) of low- and moderate-income census tracts and the multiple major disaster area declarations support the need for revitalization and stabilization efforts.

Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant retail banking service need existed for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. A financial inclusion need exists for increased access to consumer and commercial retail banking services to low- and moderate-income borrowers and census tracts. Additionally, a retail banking service need exists for digital products with evolving features and technology built in to improve the customer's financial wellness.

CONCLUSIONS ON PERFORMANCE CRITERIA IN JACKSON MSA

LENDING TEST

BankPlus demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Lending Test. The good borrower profile and good geographic distribution outweighed poor CD lending to support this conclusion. The bank also makes little use of innovative or flexible loans and exhibited excellent lending levels. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Jackson MSA assessment area.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. Excellent performance regarding home mortgage, small business, and small farm loans support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. Home mortgage lending reflects combined BankPlus and First Bank and Trust, New Orleans, Louisiana totals due to BankPlus' acquisition effective March 1, 2022. For 2022, the bank originated 1,116 total reportable home mortgage loans totaling approximately \$280.7 million. Data may have changed since the time of this CRA evaluation. BankPlus captured a 7.6 percent market share of the total number and an 8.2 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 3rd out of 322 total lenders in the Jackson MSA assessment area. This ranking lands the bank in the top 0.9 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent responsiveness to assessment area credit needs in the Jackson MSA assessment area. For 2022, the bank originated 575 total reportable small business loans totaling approximately \$66.2 million (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). Data may have changed since the time of this CRA evaluation. BankPlus captured a 4.2 percent market share of the total number of loans and a 10.0 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 6th out of 109 total lenders in the Jackson MSA assessment area. This ranking lands the bank in the top 5.5 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar volume of loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent responsiveness to assessment area credit needs in the

Jackson MSA assessment area. For 2022, the bank originated 159 total reportable small farm loans totaling approximately \$14.3 million (excluding First Bank and Trust loans as the bank was not subject to CRA data reporting in 2022). Data may have changed since the time of this CRA evaluation. BankPlus captured a 35.1 percent market share of the total number of loans and a 41.1 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 1st out of 24 total lenders in the Jackson MSA assessment area. This ranking lands the bank in the top 4.2 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar volume of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the Jackson MSA assessment area. Good records regarding small business loans and small farm loans lifted adequate records regarding home mortgage loans to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Jackson MSA assessment area. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is higher than the aggregate data by 1.8 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 1.5 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Jackson MSA Assessment Area						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	7.2	2.7	49	4.5	3,902	1.5
Moderate	15.8	9.9	91	8.4	9,132	3.4
Middle	37.4	33.0	255	23.5	45,632	17.0
Upper	39.4	54.3	688	63.4	208,892	78.0
Not Available	0.1	0.1	2	0.2	102	0.0
Totals	100.0	100.0	1,085	100.0	267,660	100.0
Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Small Business Loans

The geographic distribution of small business loans reflects good performance in the Jackson MSA assessment area. Excellent performance in low-income geographies offset by adequate performance in moderate-income geographies supports this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is substantially higher than aggregate performance by more than two times the percentage points, reflective of excellent performance. The table further shows that in moderate-income census tracts the bank's lending level rises 5.7 percentage points higher than aggregate data, reflecting an adequate level.

Geographic Distribution of Small Business Loans Jackson MSA Assessment Area						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	8.9	6.7	131	18.0	9,166	10.4
Moderate	19.3	17.1	166	22.8	21,447	24.2
Middle	29.4	30.0	154	21.2	22,171	25.1
Upper	39.1	43.9	263	36.2	33,635	38.0
Not Available	3.3	2.4	13	1.8	2,070	2.3
Totals	100.0	100.0	727	100.0	88,489	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Small Farm Loans

The geographic distribution of small farm loans reflects good performance in the Jackson MSA assessment area. Good performance in moderate-income geographies lifted adequate performance in low-income geographies to support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts is higher than the aggregate data by 6.0 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level rises 11.1 percentage points higher than aggregate data, reflecting a good level. Examiners placed more weight on moderate-income census tracts given the higher demographic for lending opportunities.

Geographic Distribution of Small Farm Loans Jackson MSA Assessment Area						
Tract Income Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.7	8.4	26	14.4	2,649	15.3
Moderate	14.5	27.0	69	38.1	4,691	27.1
Middle	33.8	30.5	35	19.3	4,315	24.9
Upper	45.0	33.9	51	28.2	5,641	32.6
Not Available	1.1	0.2	0	0.0	0	0.0
Totals	100.0	100.0	181	100.0	17,296	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes. The excellent records regarding small business loans and small farm loans lifted the adequate record regarding home mortgage loans to support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Jackson MSA assessment area. Adequate performance to both low- and moderate-income borrowers supports this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is slightly higher than the aggregate data by 0.6 percentage points, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 5.1 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Jackson MSA Assessment Area						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.8	5.4	65	6.0	3,292	1.2
Moderate	16.1	16.7	126	11.6	17,506	6.5
Middle	19.0	19.6	137	12.6	16,832	6.3
Upper	42.1	39.8	613	56.5	162,787	60.8
Not Available	0.0	18.5	144	13.3	67,244	25.1
Totals	100.0	100.0	1,085	100.0	267,660	100.0
<i>Source: 2020 U.S. Census; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent</i>						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Jackson MSA assessment area. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending to businesses with gross annual revenues of \$1 million or less rises 19.0 percentage points above the aggregate performance, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Jackson MSA Assessment Area						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	86.7	47.9	486	66.9	54,304	61.4
>\$1,000,000	3.5	--	132	18.2	23,131	26.1
Revenue Not Available	9.8	--	109	15.0	11,054	12.5
Totals	100.0	100.0	727	100.0	88,489	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Small Farm Loans

The distribution of small farm loans based on the borrowers' profiles reflects excellent performance in the Jackson MSA assessment area. Excellent performance to farms with gross annual revenues of \$1 million or less supports this conclusion. The following table illustrates the distribution of lending to businesses with gross annual revenues of \$1 million or less rises 25.2 percentage points above the aggregate performance, reflecting excellent performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Jackson MSA Assessment Area						
Gross Revenue Level	% of Farms	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000	97.3	61.5	157	86.7	13,476	77.9
>\$1,000,000	1.3	--	13	7.2	2,478	14.3
Revenue Not Available	1.4	--	11	6.1	1,342	7.8
Totals	100.0	100.0	181	100.0	17,296	100.0
Source: 2022 D&B Data; Bank Data; 2022 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0 percent						

Innovative or Flexible Lending Practices

The institution makes little use of extensive use of innovative or flexible lending practices in the Jackson MSA assessment area in order to serve assessment area credit needs, considering the dollar volume relative to the institution's capacity and the credit needs of the assessment area when arriving at this conclusion. By dollar volume, the percentage of innovative or flexible lending is 12.7 percentage points below the percentage of home mortgage and CRA reportable loans for the Jackson MSA assessment area. The dollar volume of innovative loan products and flexible lending practices, as found in the tabled data at the rated area level, supports this conclusion. Please refer to the discussion under the State of Mississippi for additional details regarding the innovative or flexible lending practices in the Jackson MSA assessment area.

Community Development Loans

The institution has made a low level of CD loans in the Jackson MSA assessment area. Its extent, or dollar volume, of CD loans outweighed the CD loans' adequate responsiveness support this conclusion.

As noted under the rated area level, BankPlus originated 67 CD loans totaling approximately \$84.3 million in the Jackson MSA assessment area. By dollar volume, this equates to 27.7 percent (or 31.3 percent of total CD loans less statewide activities) of the bank's adequate level of CD lending in the State of Mississippi as compared to the 59.0 percent of the bank's home mortgage and CRA data reportable loans attributed to this assessment area. Adequate CD loan responsiveness is based on the high dollar amount for Revitalize and Stabilize offset by no CD loans for CD services to low- and moderate-income individuals.

The following point notes an example of the bank's CD lending in the Jackson MSA assessment area.

- ***Economic Development*** - The bank originated a SBA loan totaling \$2.1 million for the plant renovations and equipment purchase at the new location of a business expanding operations. The loan helped create 12 jobs and retain 10 jobs.

The following point notes an example of the bank's CD lending in the Jackson MSA assessment area.

INVESTMENT TEST

BankPlus demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Investment Test. The adequate level of qualified CD investments combined with the good responsiveness to CD needs outweighed no use of complex investments to support this conclusion.

Investment and Grant Activity

The bank has an adequate level of qualified CD investments and grants in the Jackson MSA assessment area. The table for the State of Mississippi shows that BankPlus made 224 qualified investments totaling approximately \$14.0 million in the Jackson MSA assessment area. By dollar volume, this equates to 31.8 percent (or 34.6 percent of total qualified investments less statewide activities) of the State of Mississippi's low satisfactory level of investments as compared to 61.9 percent of total deposits attributed to this assessment area.

The following is an example of a key investment in the Jackson MSA assessment area.

- ***Economic Development*** - The institution invested in tax increment financing bonds totaling approximately \$4.9 million for the construction of a major retail center. The funds allowed small businesses to open in the retail center creating a significant number of jobs for low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

BankPlus exhibits good responsiveness to credit and CD needs through use of qualified investments that directly address identified needs in the Jackson MSA assessment area. As noted in the investment table for the State of Mississippi, the Jackson MSA assessment area shows good responsiveness to CD needs by the dollar amount in all four CD purposes categories, with an emphasis on economic development.

Community Development Initiatives

BankPlus does not use innovative or complex investments to support CD initiatives given the size of the institution and opportunities available.

SERVICE TEST

BankPlus demonstrated a low satisfactory record in the Jackson MSA assessment area regarding the Service Test. The adequate levels regarding the bank's CD services, changes in branch locations, and reasonableness of hours and services outweighed the accessible delivery systems to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to essentially all portions of the Jackson MSA assessment area. Accessible branch distribution outweighed reasonably accessible alternative delivery systems to support this conclusion. The Jackson MSA assessment area reflects an inconsistent conclusion to the institution's Accessibility of Delivery System performance, with performance above the institution.

The bank makes its full-service offices accessible to essentially all portions of the Jackson MSA assessment area. The bank's excellent performance in low-income census tracts lifted the adequate performance in moderate-income census tracts to support the accessible conclusion.

The bank's branch distribution in low-income census tracts is more than twice the percentage of the population, reflecting excellent performance. In moderate-income census tracts, the bank's branch distribution falls 6.2 percentage points below the population percentage, reflecting adequate performance.

Branch and ATM Distribution by Geography Income Level Jackson MSA Assessment Area												
Tract Income Level	Census Tracts		Population		Branches		ATMs/ITMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	24	15.9	62,503	11.0	6	22.2	6	13.0	0	0.0	1	20.0
Moderate	35	23.2	118,971	21.0	4	14.8	7	15.2	0	0.0	1	20.0
Middle	46	30.5	187,769	33.2	4	14.8	4	8.7	0	0.0	2	40.0
Upper	44	29.1	194,785	34.4	13	48.1	29	63.0	0	0.0	1	20.0
NA	2	1.3	2,001	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	151	100.0	566,029	100.0	27	100.0	46	100.0	0	0.0	5	100.0
Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0 percent												

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the Jackson MSA assessment area. The bank's adequate performance for ATMs/ITMs in low- and moderate-income census tracts and adequate performance for digital banking channels in low- and moderate-income census tracts supported the reasonably accessible conclusion.

The bank's ATMs/ITMs in low-income census tracts rises 2.0 percentage points above the population of low-income census tracts, reflecting adequate performance. The bank's ATMs/ITMs in moderate-income census tracts falls 5.8 percentage points below the population percentage, reflecting adequate performance.

Refer to the Service Test section for the state for details on digital banking services that provide banking access to low- and moderate-income people and tracts.

In addition to the overall bank statistics on digital banking channels, the bank provided data for the Jackson, Mississippi assessment area on the banking access to low- and moderate-income census tracts compared to 2020 U.S. Census data:

- The percentage of all active online banking users in low- and moderate-income census tracts at 25.7 percent compares narrowly reasonable to the population percentage in low- and moderate- income census tracts at 32.0 percent.

Changes in Branch Locations

To the extent changes have been made, the institution's record of opening and closing of branches in the Jackson MSA assessment area has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

No branch openings occurred in the Jackson MSA assessment area, while two branches closed in low- and moderate-income census tracts to consolidate with existing nearby branches in Flowood and Jackson, Mississippi.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Jackson MSA assessment area, particularly low- or moderate-income geographies or individuals. The Jackson MSA assessment area reflects product offerings, services, and branch hours consistent with the State of Mississippi.

The bank's branches have the same product offerings and services consistent with the State of Mississippi. Branch hours are open at least from Monday through Friday 9 a.m. to 4:00 p.m. Most bank's locations have 7:00 a.m. to 7:00 p.m. drive-up hours Monday through Friday, in addition to Saturday drive-up hours. ITMs extend weekday and Saturday hours at locations with these machines.

Community Development Services

The institution provides an adequate level of CD services in the Jackson MSA assessment area. Adequate performance regarding the extent of CD services and responsiveness of CD services to available opportunities primarily support this conclusion.

The table in the State of Mississippi section shows that the bank provided 145 CD services since the previous evaluation in the Jackson MSA assessment area. This number equates to an average of 1.5 CD services, per office, per year, since the previous evaluation, thereby reflecting an adequate level. The bank's averaged 32 branches for 3.0 years on average since the prior evaluation.

The following are examples of CD services specific to the Jackson MSA assessment area:

- ***Community Service*** – Employees provided 29 virtual or in-person financial education training sessions to individuals as part of the bank's small dollar loan program to encourage individuals to develop a regular savings plan. Approximately 80.0 percent of the individuals attending these financial education sessions are low- and moderate-income individuals. Small dollar loan programs are a less costly alternative to payday and other higher cost lenders.
- ***Community Service*** – A number of employees provide financial education sessions at schools where more than a majority of students receive free or reduced lunches. Therefore, these financial education sessions primarily benefit low- and moderate-income students.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED- SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's assessment areas reviewed

using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Biloxi MSA	Below	Below	Above
Memphis MSA	Consistent	Below	Consistent
Mississippi Non-MSA	Consistent	Below	Consistent

Facts and data supporting conclusions for each limited-scope assessment area follow, including a summary of BankPlus's operations and activities. The demographic data for the limited-scope assessment areas is in the appendices.

Biloxi MSA Assessment Area

The bank's Biloxi MSA assessment area consists of all of Harrison County. BankPlus operates one branch in this assessment area in a low-income census tract. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance above the institution. The availability of alternative delivery systems also demonstrated inconsistent performance with the institution, with performance above the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	16	4,014
Small Business Loans	8	1,855
Small Farm Loans	0	0
CD Loans	0	0
Investments	16	1,235
CD Services	4	--

Memphis MSA Assessment Area

The bank's Memphis MSA assessment area consists of all of Desoto County. BankPlus operates five branches in this assessment area, one in a moderate-income census tract, two in middle-income census tracts, and two in upper-income census tracts. This distribution of branches proved consistent with the institution's overall conclusion. The availability of alternative delivery systems also demonstrated consistent performance with the institution. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	146	36,239
Small Business Loans	108	14,520
Small Farm Loans	12	1,337
CD Loans	2	1,858
Investments	32	4,293
CD Services	16	--

Mississippi Non-MSA Assessment Area

The Mississippi Non-MSA assessment area consists of all of Bolivar, Claiborne, Clarke, Grenada, Humphreys, Lafayette, Lauderdale, Lawrence, Leflore, Lee, Lincoln, Marion, Newton, Oktibbeha, Pearl River, Pike, Sunflower, Walthall, and Wayne Counties. BankPlus operates 24 branches in this assessment area, with three branches in low-income census tracts, eight branches in moderate-income census tracts, six branches in middle-income census tracts, and seven branches in upper-income census tracts. This distribution of branches proved inconsistent with the institution's overall conclusion, with performance above the institution. The availability of alternative delivery systems also demonstrated consistent performance with the institution overall. Finally, the product offerings, services, and branch hours do not vary in a way that inconveniences portions of the assessment area, particularly low- or moderate-income individuals or areas.

Activity	#	\$(000s)
Home Mortgage Loans	644	122,326
Small Business Loans	597	64,192
Small Farm Loans	326	30,543
CD Loans	84	183,018
Investments	290	21,028
CD Services	75	--

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre gate
Biloxi MSA	16	4,014	2.0	6,395	5.7	6.3	3.6	15.2	12.5	17.7	37.2	37.5	39.1	40.8	43.8	38.6	1.1	0.0	1.0
Memphis MSA	146	36,239	18.1	8,592	0.0	0.0	0.0	14.0	7.5	12.1	29.9	17.8	29.7	56.1	74.7	58.2	0.0	0.0	0.0
MS Non-MSA	644	122,326	79.9	12,214	4.9	5.1	2.2	15.1	9.5	10.6	40.8	34.8	39.2	38.6	50.0	47.6	0.6	0.6	0.5
Total	806	162,579	100.0	27,201	4.1	4.2	1.8	14.9	9.2	12.7	38.1	31.8	36.2	42.3	54.3	48.8	0.5	0.5	0.4
Source: 2020 U.S. Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income census tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Biloxi MSA	8	1,855	1.1	4,797	11.1	62.5	9.5	22.5	12.5	21.5	37.1	12.5	35.3	27.5	12.5	32.0	1.8	0.0	1.7
Memphis MSA	108	14,520	15.1	3,919	0.0	0.0	0.0	18.6	11.1	11.5	32.6	26.9	30.9	48.8	62.0	57.6	0.0	0.0	0.0
MS Non-MSA	597	64,192	83.7	11,425	9.1	10.2	8.9	16.2	12.7	13.9	39.8	39.0	39.0	34.4	36.5	37.5	0.6	1.5	0.7
Total	713	80,567	100.0	20,141	8.0	9.3	7.3	17.9	12.5	15.3	38.0	36.9	36.5	35.3	40.1	40.1	0.7	1.3	0.8

Source: 2022 D&B Data; 1/1/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent

Small Farm Loans

Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Farms				Low-Income census tracts			Moderate-Income census tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis MSA	12	1,337	2.3	41	0.0	0.0	0.0	9.7	0.0	2.4	23.5	41.7	41.5	66.8	58.3	56.1	0.0	0.0	0.0
MS Non-MSA	326	30,543	62.8	1,029	7.9	13.8	11.4	16.1	12.6	16.7	43.0	41.4	41.7	32.7	32.2	29.8	0.3	0.0	0.4
Total	338	31,880	100.0	1,070	6.9	13.3	10.9	15.3	12.1	16.2	40.4	41.4	41.7	37.2	33.1	30.8	0.3	0.0	0.4

Source: 2022 D&B Data; 1/1/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0 percent

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Biloxi MSA	16	4,014	2.0	6,395	24.7	0.0	4.1	17.0	6.3	14.8	19.0	18.8	21.5	39.2	62.5	38.7	0.0	12.5	20.9
Memphis MSA	146	36,239	18.1	8,592	16.1	2.7	3.7	16.1	8.2	14.6	19.5	19.9	24.0	48.3	58.2	37.5	0.0	11.0	20.3
MS Non-MSA	644	122,326	79.9	12,214	23.5	3.3	3.9	15.7	8.4	12.7	17.0	11.3	18.2	43.8	59.2	48.7	0.0	17.9	16.5
Total	806	162,579	100.0	27,201	22.3	3.1	3.9	16.1	8.3	13.8	17.9	13.0	20.8	43.7	59.1	42.8	0.0	16.5	18.7
Source: 2020 U.S. Census ; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent																			

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Biloxi MSA	8	1,855	1.1	4,797	84.4	12.5	52.1	3.1	12.5	12.4	75.0
Memphis MSA	108	14,520	15.1	3,919	87.0	59.3	48.4	2.6	34.3	10.4	6.5
MS Non-MSA	597	64,192	83.7	11,425	83.8	75.7	49.5	3.6	12.4	12.6	11.9
Total	713	80,567	100.0	20,141	84.5	72.5	49.9	3.4	15.7	12.2	11.8
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent											

Small Farm Loans

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Memphis MSA	12	1,337	2.3	41	97.7	66.7	39.0	1.1	16.7	1.1	16.7
MS Non-MSA	326	30,543	62.8	1,029	95.7	77.3	51.1	2.4	19.0	1.9	3.7
Total	338	31,880	100.0	1,070	96.0	76.9	50.7	2.3	18.9	1.8	4.1
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 percent											

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
 - i. The proportion of the bank's lending in the bank's assessment area(s);
 - ii. The dispersion of lending in the bank's assessment areas(s); and
 - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
 - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
 - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
 - iii. Small business and small farm loans by loan amount at origination; and
 - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (e.g., RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Alabama	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Florida	Needs to Improve	Low Satisfactory	Needs to Improve	Needs to Improve
Louisiana	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Mississippi	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

ALABAMA

Alabama Non-MSA Assessment Area

The Alabama Non-MSA assessment area consists of all of Coffee County. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Alabama Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	6.3	56.3	37.5	0.0
Population by Geography	53,465	0.0	8.7	46.2	45.1	0.0
Housing Units by Geography	23,313	0.0	8.5	49.9	41.6	0.0
Owner-Occupied Units by Geography	13,527	0.0	4.5	45.4	50.1	0.0
Occupied Rental Units by Geography	6,424	0.0	16.2	52.8	31.0	0.0
Vacant Units by Geography	3,362	0.0	10.2	62.2	27.6	0.0
Businesses by Geography	3,894	0.0	14.8	45.6	39.7	0.0
Farms by Geography	216	0.0	4.2	48.1	47.7	0.0
Family Distribution by Income Level	13,601	17.2	14.4	17.4	51.0	0.0
Household Distribution by Income Level	19,951	19.1	10.4	16.2	54.3	0.0
Median Family Income Non-MSAs - AL		\$55,960	Median Housing Value			\$144,877
			Median Gross Rent			\$807
			Families Below Poverty Level			11.7%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 11 offices in this market, with the bank having 3.1 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#20 by rank and 1.1% by market share) and small business (#18 by rank and 6.7% by market share). Rank is based on total number and dollar amount of loans.

Dothan MSA Assessment Area

The Dothan MSA assessment area consists of all of Geneva and Houston Counties. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Dothan MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	6.3	25.0	40.6	28.1	0.0
Population by Geography	133,861	3.2	24.5	42.0	30.2	0.0
Housing Units by Geography	60,699	4.0	25.8	42.5	27.8	0.0
Owner-Occupied Units by Geography	34,184	1.2	21.7	44.5	32.5	0.0
Occupied Rental Units by Geography	16,172	7.8	32.6	37.0	22.6	0.0
Vacant Units by Geography	10,343	7.1	28.5	44.3	20.1	0.0
Businesses by Geography	13,069	11.1	24.5	30.4	34.0	0.0
Farms by Geography	658	3.3	22.0	47.4	27.2	0.0
Family Distribution by Income Level	33,463	22.7	18.0	17.9	41.3	0.0
Household Distribution by Income Level	50,356	25.6	15.1	16.7	42.5	0.0
Median Family Income MSA - 20020 Dothan, AL MSA		\$61,627	Median Housing Value			\$130,649
			Median Gross Rent			\$750
			Families Below Poverty Level			13.2%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 44 offices in this market, with the bank having 4.9 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#30 by rank and 0.7% by market share) and small business (#22 by rank and 2.7% by market share). Rank is based on total number and dollar amount of loans.

Huntsville MSA Assessment Area

The Huntsville MSA assessment area consists of all of Madison County. On September 19, 2022, the Huntsville MSA assessment area was designed as a new assessment area due to a branch opening. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Huntsville MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	15.8	18.9	27.4	36.8	1.1
Population by Geography	388,153	14.8	15.5	30.3	38.7	0.7
Housing Units by Geography	164,100	15.6	16.9	29.8	36.9	0.8
Owner-Occupied Units by Geography	102,658	7.6	14.7	32.1	45.6	0.1
Occupied Rental Units by Geography	48,970	30.1	20.8	25.7	21.0	2.4
Vacant Units by Geography	12,472	25.3	20.2	26.5	27.1	0.9
Businesses by Geography	40,114	16.1	15.4	23.5	42.0	3.0
Farms by Geography	1,124	9.4	16.5	34.9	38.0	1.2
Family Distribution by Income Level	96,331	23.0	15.4	18.4	43.1	0.0
Household Distribution by Income Level	151,628	25.6	15.3	15.8	43.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$85,279	Median Housing Value			\$190,104
			Median Gross Rent			\$904
			Families Below Poverty Level			8.4%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 97 offices in this market, with the bank having 0.1 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#320 by rank and 0.01% by market share) and small business (#99 by rank and 0.01% by market share). Rank is based on total number and dollar amount of loans.

LOUISIANA

Baton Rouge MSA Assessment Area

The Baton Rouge MSA assessment area consists of all of Ascension, East Baton Rouge, Livingston, and Pointe Coupee Parishes. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Baton Rouge MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	12.4	19.7	34.3	29.2	4.5
Population by Geography	746,321	10.7	17.0	36.6	32.2	3.4
Housing Units by Geography	312,843	11.1	17.4	36.2	31.9	3.5
Owner-Occupied Units by Geography	182,712	5.7	15.4	38.9	38.2	1.7
Occupied Rental Units by Geography	83,704	20.2	20.0	29.7	24.4	5.7
Vacant Units by Geography	46,427	15.6	20.0	36.9	20.8	6.6
Businesses by Geography	112,603	9.2	18.3	34.8	36.0	1.8
Farms by Geography	2,631	6.3	18.6	38.7	34.7	1.7
Family Distribution by Income Level	173,403	23.3	15.9	17.8	43.0	0.0
Household Distribution by Income Level	266,416	25.4	14.3	16.1	44.1	0.0
Median Family Income MSA - 12940 Baton Rouge, LA MSA		\$77,948	Median Housing Value			\$194,849
			Median Gross Rent			\$950
			Families Below Poverty Level			10.7%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (* The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 164 offices in this market, with the bank having 0.7 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#54 by rank and 0.5% by market share) and small business (#43 by rank and 1.0% by market share). BankPlus acquired the First Bank and Trust, New Orleans, Louisiana on March 1, 2022, with First Bank and Trust's 2022 home mortgage rank as 204 with 0.1 percent market share. Rank is based on total number and dollar amount of loans.

Hammond MSA Assessment Area

The Hammond MSA assessment area consists of all of Tangipahoa Parish. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Hammond MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	31	9.7	16.1	48.4	22.6	3.2
Population by Geography	133,157	7.3	12.7	48.1	30.4	1.5
Housing Units by Geography	56,449	7.3	14.9	49.5	27.0	1.4
Owner-Occupied Units by Geography	34,133	5.4	12.2	51.1	30.5	0.7
Occupied Rental Units by Geography	14,415	12.7	19.4	45.8	20.1	2.0
Vacant Units by Geography	7,901	5.3	18.0	49.2	24.1	3.4
Businesses by Geography	15,810	11.4	16.1	43.6	27.8	1.0
Farms by Geography	574	3.3	11.7	51.7	31.7	1.6
Family Distribution by Income Level	32,187	26.2	15.0	16.7	42.1	0.0
Household Distribution by Income Level	48,548	28.2	15.4	12.6	43.9	0.0
Median Family Income MSA - 25220 Hammond, LA MSA		\$62,373	Median Housing Value			\$159,462
			Median Gross Rent			\$800
			Families Below Poverty Level			15.8%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 33 offices in this market, with the bank having 6.6 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#48 by rank and 0.7% by market share) and small business (#20 by rank and 2.0% by market share). BankPlus acquired the First Bank and Trust, New Orleans, Louisiana on March 1, 2022, with First Bank and Trust's 2022 home mortgage rank as 44 with 0.5 percent market share. Rank is based on total number and dollar amount of loans.

Lafayette MSA Assessment Area

The Lafayette MSA assessment area consists of all of Lafayette Parish. On March 1, 2022, the Lafayette MSA assessment area was designated as a new assessment area due to the First Bank and Trust, New Orleans acquisition. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Lafayette MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	58	6.9	17.2	24.1	51.7	0.0
Population by Geography	241,753	4.3	18.5	21.7	55.5	0.0
Housing Units by Geography	103,855	4.4	20.0	22.4	53.2	0.0
Owner-Occupied Units by Geography	61,780	2.3	16.6	18.7	62.3	0.0
Occupied Rental Units by Geography	30,696	8.1	24.4	29.4	38.1	0.0
Vacant Units by Geography	11,379	5.7	26.7	23.4	44.2	0.0
Businesses by Geography	44,710	5.4	15.6	20.7	58.3	0.0
Farms by Geography	930	2.5	13.5	20.8	63.2	0.0
Family Distribution by Income Level	59,053	22.1	13.7	16.3	47.9	0.0
Household Distribution by Income Level	92,476	24.4	14.3	14.2	47.2	0.0
Median Family Income MSA - 29180 Lafayette, LA MSA		\$66,741	Median Housing Value			\$197,291
			Median Gross Rent			\$880
			Families Below Poverty Level			12.6%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 87 offices in this market, with the bank having 0.4 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (#144 by rank and 0.1% by market share) and small business (#64 by rank and 0.4% by market share). Rank is based on total number and dollar amount of loans.

Louisiana Non-MSA Assessment Area

The Louisiana Non-MSA assessment area consists of all of St. Landry Parish. On March 1, 2022, the Louisiana Non-MSA assessment area expanded to include all of St. Landry Parish.

Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Louisiana Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	7.1	35.7	32.1	21.4	3.6
Population by Geography	82,540	5.0	26.5	36.9	29.4	2.2
Housing Units by Geography	37,110	6.5	28.6	38.2	23.9	2.8
Owner-Occupied Units by Geography	21,079	5.4	25.0	39.8	29.1	0.7
Occupied Rental Units by Geography	9,417	10.1	31.5	34.8	15.5	8.1
Vacant Units by Geography	6,614	5.0	35.8	37.9	19.5	1.8
Businesses by Geography	8,496	6.0	26.1	39.7	26.2	1.9
Farms by Geography	481	2.1	24.7	35.1	38.0	0.0
Family Distribution by Income Level	21,008	28.0	14.5	20.3	37.2	0.0
Household Distribution by Income Level	30,496	26.6	13.0	16.5	43.8	0.0
Median Family Income Non-MSAs - LA		\$50,254	Median Housing Value			\$115,861
			Median Gross Rent			\$611
			Families Below Poverty Level			20.9%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 35 offices in this market, with the bank having 1.5 percent of deposit market share.

For 2022, the bank's market share of small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: small business (41 by rank and 1.6 percent by market share). Rank is based on total number and dollar amount of loans.

MISSISSIPPI

Biloxi MSA Assessment Area

The Biloxi MSA assessment area consists of all of Harrison County. On March 1, 2022, the Biloxi MSA assessment area was designated as a new assessment area due to the First Bank and Trust, New Orleans, Louisiana acquisition. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Biloxi MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	11.0	18.3	36.6	29.3	4.9
Population by Geography	208,621	10.2	18.7	37.3	32.2	1.6
Housing Units by Geography	93,678	11.1	20.0	37.4	29.4	2.1
Owner-Occupied Units by Geography	46,194	5.7	15.2	37.2	40.7	1.1
Occupied Rental Units by Geography	33,903	17.0	27.9	34.9	16.6	3.6
Vacant Units by Geography	13,581	14.3	16.7	44.4	22.6	2.0
Businesses by Geography	16,355	11.1	22.5	37.1	27.5	1.8
Farms by Geography	330	7.3	19.4	34.8	37.0	1.5
Family Distribution by Income Level	52,766	24.7	17.0	19.0	39.2	0.0
Household Distribution by Income Level	80,097	25.5	16.2	18.5	39.7	0.0
Median Family Income MSA - 25060 Gulfport-Biloxi, MS MSA		\$62,967	Median Housing Value			\$150,616
			Median Gross Rent			\$892
			Families Below Poverty Level			15.1%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 55 offices in this market, with the bank having 0.7 percent of deposit market share.

For 2022, the bank's market share of home mortgage and small business lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (64 by rank and 0.2 percent by market share) and small business (44 by rank and 0.6 percent by market share). BankPlus acquired the First Bank and Trust, New Orleans, Louisiana on March 1, 2022, with First Bank and Trust's 2022 home mortgage rank as 102 with 0.1 percent market share. Rank is based on total number and dollar amount of loans.

Memphis MSA Assessment Area

The Memphis MSA assessment area consists of all of DeSoto County. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Memphis MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	0.0	24.4	31.7	43.9	0.0
Population by Geography	185,314	0.0	19.0	31.0	50.0	0.0
Housing Units by Geography	68,411	0.0	20.7	33.0	46.2	0.0
Owner-Occupied Units by Geography	48,168	0.0	14.0	29.9	56.1	0.0
Occupied Rental Units by Geography	16,256	0.0	37.3	40.9	21.8	0.0
Vacant Units by Geography	3,987	0.0	34.4	39.1	26.5	0.0
Businesses by Geography	12,706	0.0	18.6	32.6	48.8	0.0
Farms by Geography	349	0.0	9.7	23.5	66.8	0.0
Family Distribution by Income Level	47,566	16.1	16.1	19.5	48.3	0.0
Household Distribution by Income Level	64,424	15.7	13.0	17.7	53.6	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$68,008	Median Housing Value			\$176,878
			Median Gross Rent			\$1,025
			Families Below Poverty Level			7.6%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 59 offices in this market, with the bank having 7.1 percent of deposit market share.

For 2022, the bank's market share of home mortgage, small business, and small farm lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (14 by rank and 1.6 percent by market share), small business (9 by rank and 8.5 percent by market share) and small farm (2 by rank and 60.1 percent by market share). Rank is based on total number and dollar amount of loans.

Mississippi Non-MSA Assessment Area

The Mississippi Non-MSA assessment area consists of all of Bolivar, Claiborne, Clarke, Grenada, Humphreys, Lafayette, Lauderdale, Lawrence, Leflore, Lee, Lincoln, Marion, Newton, Oktibbeha, Pearl River, Pike, Sunflower, Walthall, and Wayne Counties. On September 26, 2022, the Mississippi Non-MSA assessment area expanded to include all of Lafayette County due to a branch opening. On May 30 2023, the Mississippi Non-MSA assessment area expanded to include all of Oktibbeha County due to a branch opening. Demographic data for this assessment area is included in the following table.

Demographic Information of the Assessment Area Mississippi Non-MSA Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	182	8.2	17.6	37.9	34.1	2.2
Population by Geography	626,174	6.7	17.2	40.0	35.4	0.6
Housing Units by Geography	288,688	7.5	17.4	40.4	34.1	0.5
Owner-Occupied Units by Geography	159,905	4.9	15.1	40.8	38.6	0.6
Occupied Rental Units by Geography	75,697	11.5	20.8	39.7	27.5	0.6
Vacant Units by Geography	53,086	9.5	19.5	40.3	30.3	0.4
Businesses by Geography	46,941	9.0	16.2	39.8	34.4	0.6
Farms by Geography	2,305	7.9	16.1	43.0	32.7	0.3
Family Distribution by Income Level	150,246	23.5	15.7	17.0	43.8	0.0
Household Distribution by Income Level	235,602	27.7	14.0	14.6	43.7	0.0
Median Family Income Non-MSAs - MS		\$53,003	Median Housing Value			\$126,660
			Median Gross Rent			\$725
			Families Below Poverty Level			17.3%
Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.						

The assessment area is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2023, financial institutions operated 11 offices in this market, with the bank having 3.1 percent of deposit market share.

For 2022, the bank's market share of home mortgage, small business, and small farm lending by dollar volume in the assessment area is reasonable in comparison with the bank's market share for deposits by dollar amount in the assessment area. In 2022, the bank's ranking by loan products based on number of loans and market share percentage based on dollar volume in the assessment area is as follows: home mortgage (4 by rank and 5.5 percent by market share), small business (6 by rank and 10.7 percent by market share) and small farm (1 by rank and 35.3 percent by market share). BankPlus acquired the First Bank and Trust, New Orleans, Louisiana on March 1, 2022, with First Bank and Trust's 2022 home mortgage rank as 203 with 0.1 percent market share. Rank is based on total number and dollar amount of loans.

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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income 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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating 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.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.