



2023 CRA PUBLIC FILE

FNB OXFORD BANK

Community Reinvestment Act Policy Statement

I. Introduction

A. Purpose. The purpose of the Community Reinvestment Act and Reg. BB is to encourage banks to help meet the credit needs of their local community; to provide guidance to banks regarding an assessment of their record of satisfying the continuing and affirmative obligations each bank has to help meet the credit needs of its local community, including low- and moderate-income neighborhoods, consistent with safe and sound operations; and to provide for taking a bank's record of compliance with the Community Reinvestment Act into account in connection with certain applications filed with the bank's regulators. Additional guidance can be found in the Q&As at www.ffiec.gov/cra

B. Definitions

1. Area Median Income - Area Median Income is the median family income for the MSA (if a person or geography is located in an MSA) or the statewide non metropolitan median family income is a person or geography located outside an MSA.
2. Assessment Area - An assessment Area is a geographic area which will consist generally of one or more MSAs or one or more contiguous political subdivisions (such as towns, cities, counties) and include the geographies in which the bank has its main office, its branches, and its deposit-taking ATMs, as well as the surroundings geographies in which the bank has originated or purchased a substantial portion of its loans. A bank may adjust the boundaries of its assessment area(s) to include only the portion of a political subdivision that it can reasonably be expected to serve. Assessment areas must consist only of whole geographies, may not reflect illegal discrimination, and may not arbitrarily exclude low to moderate income geographies.
3. Community Development - Community Development means:
 - (a) affordable housing, multi-family rental, for low- or moderate-income individuals;
 - (b) community services targeted to low- or moderate-income individuals;
 - (c) activities that promote economic development by financing businesses or farms that have gross annual revenues of \$1 million dollars or less; or
 - (d) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved non-metropolitan middle-income geographies designated by the Federal Reserve Board, the FDIC and the OCC.

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4. Community Development Loan means a loan that:
 - a. has as its primary purpose community development; and
 - b. except in cases 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 as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family dwelling loan; and
 - ii. benefits the Bank's assessment area or a broader statewide or regional area that includes the Bank's assessment areas.
5. Community Development Service means a service that:
 - a. has as its primary purpose community development;
 - b. is related to the provision of financial services; and
 - c. has not been considered in the evaluation of the Bank's retail banking services under Standard Assessment Test.
1. 6. Consumer loan means a loan to one or more individuals for household, family or other personal expenditures not including a home mortgage, small business, or small farm loan. The following are categories of consumer loans:
 - a. motor vehicle loans (consumer loan extended for the purchase of and secured by a motor vehicle);
 - b. credit card loans;
 - c. other secured consumer loans; and
 - d. other unsecured consumer loans.
6. Geography means a census tract or block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.
7. Income Level - Income Levels are defined by four categories.

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- a. low income is an individual income that is less than 50% of the area median income, or a median family income that is less than 50% of a geography.
 - b. moderate income is an individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80% of a geography.
 - c. middle income is an individual income that is at least 80% and less than 120% of the median income or a median family income that is at least 80% and less than 120% in the case of a geography.
 - d. upper income is an individual income that is 120% or more of the area median income, or a median family income that is 120% or more of a geography.
8. Loan Location - A consumer loan is located in the geography where the borrower resides. A home mortgage loan is located in the geography where the property to which the loan relates is located. A small business or small farm loan is located in the geography where the main business facility or farm is located or where the loan proceeds otherwise will be applied.
 9. MSA - A MSA is a metropolitan statistical area or a primary metropolitan statistical area as defined by the Office of Management and Budget.
 10. Qualified Investment - A Qualified Investment is a lawful investment, deposit, membership share, or grant that has as its primary purpose community development.
 11. Small Bank - means a bank with less than \$1.503 billion in assets as of December 31 of either of the prior two calendar years.
 12. Intermediate Small Bank. An intermediate small bank is defined as one with assets of \$376 million as of December 31 of both of the prior two calendar years but less than \$1.503 billion as of either of the prior two calendar years (Figures are the asset size thresholds effective January 1, 2023) (those figures may change annually).
 13. Small Business Loan - A Small Business Loan has the same definition as found in the instructions for preparation of the Consolidated Report of Condition and Income.
 14. Small Farm Loan - A Small Farm Loan has the same definition as found in the instructions for preparation of the Consolidated Report of Condition and Income.

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II. Bank Policy and Procedures

It is the policy and commitment of the FNB Oxford Bank and its Board of Directors to comply with the technical requirements and spirit of the Community Reinvestment Act. We commit to be aware of the credit needs of our Assessment Area, and to meet those needs consistent with safe and sound operations of the bank. We may extend credit to borrowers that do not reside in our defined Assessment Area, but we are committed to focusing our primary lending activities to those who live or work in a reasonable proximity to our banking location(s). All those loans will be offered in a manner that is consistent with safe and sound practices, and will conform to our bank lending policy. We will not discriminate against any credit applicant on the basis of race, color, religion, national origin, sex, marital status, age, familial status, handicap, because all or part of the applicant's income is derived from public assistance programs, or because the applicant resides in what is considered to be a low, moderate, or middle income area. The Board of Directors of FNB Oxford Bank has directed bank management to be informed of the credit needs of our Assessment Area, and that they be knowledgeable and active in our Community Programs. Compliance with the Community Reinvestment Act is a major consideration of FNB Oxford Bank and satisfactory compliance is a substantial objective of bank management and the Board of Directors.

III. Options for Performance

As a small bank institution, we have chosen to achieve compliance by adhering to the Small Bank Performance Standards. Standards for this method are contained in the following sections of this Policy Statement.

- * Maintain current data on median income levels, distribution of household income, housing costs, and other data that may assist us in evaluating our community(s);
- * Gather information (as available) from community organizations, state, and local governments, economic development agencies, and other sources about lending, investment, and service opportunities that affect our Assessment Area;
- * Analyze our product offerings and business strategy to ensure that we are meeting the credit needs of our assessment area consistent with safe and sound operations of this bank;

IV. CRA PUBLIC FILE

- A. Information Available to the Public. Our Bank will maintain a public file that is readily available for public inspection and will include the following information:

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- (1) all written comments received from the public for the current year and each of the prior two calendar years that specifically relate to our Bank's performance in helping the community credit needs, and any response to the comments by our Bank. We will not maintain comments, nor responses, in the public file which contain statements that reflect adversely on the good name or reputation of any persons other than the Bank or publication of which would violate specific provisions of law;
- (2) a copy of the public section of our most recent CRA Performance Evaluation prepared by our Bank regulators. Our Bank will place this copy in the public file within thirty (30) business days after it is received from the regulators;
- (3) a list of our Bank's branches, including their street addresses and geographies;
- (4) a list of any branches opened or closed during the current year and each of the two prior calendar years, their street addresses and geographies;
- (5) a list of services generally offered at each branch, including hours of operation, available loan and deposit products, and transaction fees, and a description of any material differences in the availability or cost of services at a particular branch(es);
- (6) a map of each assessment area that show the boundaries of the area and identification of each geography within the assessment area (map or list);
- (7) the bank's loan to deposit ratio for each quarter of the prior calendar year; and
- (8) any other information that our Bank considers as relevant regarding to our performance in meeting the credit needs of our community.

B. Location of Public Information. Our Bank shall make available to the public for inspection upon request and at no cost the information required in this Section as follows:

- (1) at the main office and, if an interstate bank, at one branch office in each state, all information in the public file; and
- (2) at each branch:
 - a. a copy of the public section of our Banks most recent CRA Performance Evaluation and a list of services provided by the branch; and
 - b. within five (5) calendar days of any such request, all the information in the public file relating to the assessment area in which the branch is located.

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C. Copies. Upon request, our Bank will provide copies, either on paper or in another form acceptable to the person making such request, of the information in our CRA public file. Our Bank may charge a reasonable fee not to exceed the cost of copying and mailing, if applicable.

D. Updating the CRA Public File. Our Bank will ensure that the information required in our public file is current as of April 1 of each year.

- * Post a Community Reinvestment Act Notice in the Main Office and each Branch Office. See Exhibit A.

IV. Small Bank Performance Standards/Policy and Procedure

As of January 1, 2023, small bank is defined as a bank with assets of less than \$1.503 billion as of December 31 of either of the two prior calendar years. Also as of January 1, 2023, an intermediate small bank is a small bank with assets of at least \$376 million as of December 31 of both of the prior two calendar years but less than \$1.503 billion as of December 31 of either of the prior two calendar years. These thresholds are updated on an annual basis. The primary focus of the streamlined assessment is almost completely on our Bank's lending performance.

A. Scope. Under the streamlined assessment, our examiners will evaluate our performance of our loan distribution and the context of our Bank's capacity to lend, local economic conditions and lending opportunities within our assessment area.

B. Performance Criteria. Our regulators will evaluate the record of our Bank under the streamlined performance standards of helping to meet the credit needs of our assessment areas pursuant to the following criteria:

1. The Lending Test (for small banks)

a. Our Bank's loan-to-deposit ratio, adjusted for seasonal variation and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary market, community development loans, or qualified investments;

i. Percentage of loans and, as appropriate, other lending-related activities located in our delineated assessment areas;

ii. Our Bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes;

iii. The geographic distribution of our Bank's loans; and

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iv. Our Bank's record of taking action, if warranted, in response to written complaints about our performance in helping to meet credit needs in our assessment areas.

2. The Community Development Test (for intermediate small banks)

a. Our regulators will evaluate the record of our Bank under the streamlined performance standards of helping to meet the credit needs of our assessment areas pursuant to the fellowship criteria:

- i. Our Bank's number and amount of community development loans;
- ii. Our Bank's number and amount of qualified investments;
- iii. the extent to which our Bank provides community development services and
- iv. our Bank's responsiveness through the above-listed activity to community development lending, investment, and service.

We have elected to address our Community Reinvestment Act Performance with the small bank performance standards and we will:

- * Maintain a reasonable loan-to-deposit ratio (which may be adjusted for seasonal variation, loan origination for sale to the secondary market, community development loans or qualified investments);
- * Monitor and analyze the percentage of loans made in our assessment area(s);
- * Monitor and analyze loans made to persons of different income levels;
- * Monitor and analyze loans made to business and farms;
- * Analyze the geographic distribution of our loans to ensure a reasonable distribution throughout our assessment area(s) and
- * Act with priority to address any written complaint we receive concerning the meeting of credit needs.

VI. Record Retention

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We will maintain any documents that evidence compliance with the Community Reinvestment Act for a period of three (3) years.

VII. Assessment areas

A. Scope. Our Bank must delineate one or more assessment area(s) within which the regulators will evaluate our record of helping to meet the credit needs of our community. The Bank's assessment area must be a geographic area generally consisting of MSA boundaries or political subdivisions. However, where appropriate, our Bank will make adjustment to the boundaries of our assessment area(s) to include only the portion of a political subdivision that we can reasonably be expected to serve.

B. Requirements. While there are limitations on the delineation of our assessment area, our Bank's assessment areas:

1. must consist of whole geographies;
2. may not reflect illegal discrimination;
3. may not arbitrarily exclude low- or moderate- income geographies, taking into account the bank size and financial conditions; and
4. may not extend substantially beyond a MSA boundary or beyond a state boundary unless the assessment area is located in a multi-state MSA. If our Bank serves a geographic area that extends substantially beyond a state boundary, our Bank will delineate separate assessment areas for the areas in each state. If our Bank serves a geographic area that extends substantially beyond a MSA boundary, our Bank will delineate separate assessment areas for the areas inside and outside the MSA

The FNB Oxford Bank's assessment area for Lafayette County consists of 15 Census Tracts:

9501.00	9504.03
9502.01	9504.04
9502.03	9505.02
9502.04	9505.04
9503.01	9505.05
9503.03	9505.06
9503.04	9505.07
9504.02	

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The FNB Oxford Bank's assessment area for FNB Tupelo Bank, A Branch of FNB Oxford Bank located, in Lee County consists of 23 census tracts:

9501.01	9506.01
9501.02	9506.02
9502.02	9507.00
9502.03	9508.00
9502.04	9509.01
9503.01	9509.02
9503.02	9510.01
9504.01	9510.02
9504.03	9511.01
9504.04	9511.02
9505.01	9800.00
9505.02	

The FNB Oxford Bank's assessment area for FNB Water Valley Bank (opened November 13, 2023), A Branch of FNB Oxford Bank located, in Yalobusha County consists of 5 census tracts:

9501.00	9503.02
9502.00	9999.99
9503.01	

VIII. Effect of CRA Performance on Applications

A. The assessment of the Bank's record of performance with respect to CRA will be taken into effect in connection with the applications for deposit insurance; for approval of an establishment of a domestic branch or other facility that has the ability to accept deposits and for which an application is required; approval of a relocation of the main office of branch office of the bank; and approval of a merger, consolidation, acquisition of assets or assumption of liabilities.

B. The assessment of the Bank's record of performance in helping to meet the credit needs of its community may be the basis for denial or conditional approval of one of the applications listed above.

C. In considering an application by the Bank to convert into, merge or consolidate with, or have its assets acquired or liabilities assumed by another bank, the (applicable regulatory agency) will take into account any views expressed by the applicable State and Federal supervisors

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IX. Publication of Planned Examination Schedule

Our regulatory agency will publish at least thirty (30) days in advance of the beginning of each calendar quarter a list of banks scheduled for CRA examination in that quarter.

X. CDFI and Funding Program Procedures

FNB Oxford Bank participates in the CDFI and Funding Program.

Overview: These CDFI and Funding Program Procedures are designed to ensure compliance with all Federal, State, and local government assistance agreements.

Areas of Responsibility:

- **Chief Executive Officer (CEO)** – Responsible for overseeing implementation of Procedures by Chief Risk Officer and Compliance Officer. Reports to Board regarding matters of compliance with Procedures. Has authority to approve exceptions to Procedures where appropriate.
- **Chief Financial Officer (CFO)** – In consultation with the CEO, responsible to ensure financial assistance funds are injected downstream into Bank capital or otherwise as directed by the applicable assistance agreement.
- **Compliance/Risk Officer** – Primary responsibility for implementation of Procedures and for daily control and coordination of Procedures. Authority to make discretionary modifications to Procedures. Reports to Chief Executive Officer regarding matters of compliance with Procedures and maintains regular communication with outside CDFI consultant to ensure all reporting, Use of Funds, and other CDFI compliance requirements are being met.

Content of Procedures:

- The Chief Executive Officer, in consultation with the CFO, Compliance/Risk Officer, and outside CDFI consultant, shall promptly report to the Board, or the Audit/Compliance Committee thereof, regarding the receipt of any Federal, State, or local financial assistance, and will report regularly, as the circumstances may indicate, regarding compliance matters related to all existing financial assistance funds held by the Company.
- The Chief Executive Officer shall report to the Board of Directors at least annually regarding the Company's progress toward compliance with financial assistance Performance Goals & Measures.
- The Compliance/Risk Officer shall evaluate and track the Company's performance on all applicable financial assistance Performance Goals & Measures.
- For funding sources other than Federal, State, and local financial assistance agreements, the

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CEO and CFO, under the supervision of the ALCO Committee of the Board, shall regularly monitor the Company's compliance with all applicable financial covenants and other applicable compliance requirements.

Reviewed by:	Board Approved:
Misty Fiew – December 2016 – no changes	2/21/17
Misty Fiew – March 2018	3/20/18
Misty Fiew – February 2019	4/16/19
Misty Fiew – March 2020	3/17/2020
Misty Fiew – May 2021	5/18/2021
Misty Fiew – June 2022	6/21/2022
MRF – March 2023	3/21/2023
Misty Fiew – Added Yalobusha County	10/17/2023

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Exhibit A

COMMUNITY REINVESTMENT ACT NOTICE

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

Your involvement is encouraged.

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

At least 30 days before the beginning of each quarter, The Federal Reserve system publishes a nationwide list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from the Regional Director, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63106-3716. You may send written comments about our performance in helping to meet community credit needs to Peyton Atchley, Executive Vice President & CFO, P.O. Box 847, Oxford, MS 38655 and Regional Director, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63106-3716. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our application covered by the CRA filed with the Reserve Bank. We are an affiliate of First National Holding Company, a bank holding company. You may request from the Regional Director, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63106-3716 an announcement of applications covered by the CRA filed by bank holding companies.

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Exhibit A

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

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You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our application covered by the CRA filed with the Reserve Bank. We are an affiliate of First National Holding Company, a bank holding company. You may request from the Regional Director, Federal Reserve Bank of St. Louis, P.O. Box 442, St. Louis, MO 63106-3716 an announcement of applications covered by the CRA filed by bank holding companies.

PUBLIC COMMENTS

There have been no comments to this file during the years of 2021, 2022, 2023, or 2024.

RESPONSES TO PUBLIC COMMENTS

There have been no comments for the years of 2021, 2022, 2023, or 2024.

PUBLIC DISCLOSURE

December 7, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**FNB Oxford Bank
RSSD #590640**

**101 Courthouse Square
Oxford, Mississippi 38655**

Federal Reserve Bank of St. Louis

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

FNB Oxford Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending activity. The factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment areas.
- A majority of loans are in the assessment areas.
- Distribution of loans to borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different income levels (including low- and moderate-income [LMI]).
- The geographic distribution of loans reflects a poor dispersion throughout the assessment areas.
- No CRA-related complaints were filed against the bank since the previous CRA evaluation.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) small bank procedures. The bank operates within two separate assessment areas, both are located in northern Mississippi. The bank's primary assessment area is Lafayette County. Its second assessment area is Lee County, which is located one full county to the east of Lafayette County. Both assessment areas are located in a nonmetropolitan statistical area (nonMSA) portion of the state and were analyzed using full-scope review procedures.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each assessment area reviewed as part of this evaluation. Deposit information in the following table and throughout this evaluation is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2020.

Assessment Area	Offices		Deposits as of June 30, 2020		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Lafayette County	4	80%	\$336,035	98.4%	1	0	1
Lee County	1	20%	\$5,464	1.6%	1	0	1
OVERALL	5	100%	\$341,499	100%	2	0	2

In light of branch structure and loan and deposit activity, the bank's CRA performance in the Lafayette County assessment area was given primary consideration, as it contains the vast majority of the bank's loan and deposit activity.

Furthermore, small business and 1–4 family residential real estate loans were used to evaluate the bank’s lending performance, as these loan categories represent the bank’s core business lines based on lending volume and the bank’s stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. However, as the bank has a particular emphasis on and higher volume of small business lending, performance based on the small business loan category carried the most significance toward the bank’s overall performance conclusions. The following table details the performance criteria and the corresponding time periods used in each analysis.

Performance Criterion	Time Period
LTD Ratio	June 30, 2016 – September 30, 2020
Assessment Area Concentration	January 1, 2019 – December 31, 2019
Loan Distribution by Borrower’s Profile	
Geographic Distribution of Loans	
Response to Written CRA Complaints	May 9, 2016 – December 6, 2020

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on Home Mortgage Disclosure Act and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2015 American Community Survey (ACS) data and certain business demographics are based on 2019 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors affecting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons. In addition, the bank’s lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Three other banks were identified as similarly situated peers, with asset sizes ranging from \$322.0 million to \$395.5 million as of September 30, 2020.

To augment this evaluation, four community contact interviews conducted with members of the local community were referenced to ascertain specific credit needs, opportunities, and local market conditions within the bank’s assessment areas. Information from these interviews also assisted in evaluating the bank’s responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section, applicable to the assessment area in which they were conducted.

DESCRIPTION OF INSTITUTION

FNB Oxford Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by First National Holding Company, a one-bank holding company. The bank and its holding company are both headquartered in Oxford, Mississippi. The bank’s branch network consists of five offices (including the main office), all of which have full-service automated teller machines (ATMs) on site. The main office and two branches are full-service facilities, whereas the other two branches only offer limited services. In addition, the main

office and three branches have interactive teller machines on site with extended service hours. Furthermore, the main office and three branches have drive-thru accessibility. The bank did not open any branch offices during this review period, but did close one limited-service facility that was in an upper-income census tract. Based on the current branch network and other service delivery systems, such as full-service online banking capabilities, the bank is well positioned to deliver financial services to the entirety of its assessment areas.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank appeared capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of September 30, 2020, the bank reported total assets of \$440.4 million. As of the same date, loans and leases outstanding were \$231.8 million (52.6 percent of total assets), and deposits totaled \$355.5 million. The bank's loan portfolio composition by credit category is displayed in the following table:

Distribution of Total Loans as of September 30, 2020		
Credit Category	Amount (\$000s)	Percentage of Total Loans
Construction and Development	\$30,878	13.3%
Commercial Real Estate	\$70,383	30.4%
Multifamily Residential	\$16,112	7.0%
1-4 Family Residential	\$69,888	30.2%
Farmland	\$1,538	0.7%
Farm Loans	\$0	0.0%
Commercial and Industrial	\$38,582	16.6%
Loans to Individuals	\$3,983	1.7%
Total Other Loans	\$382	0.2%
TOTAL	\$231,746	100%

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

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on May 9, 2016.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank meets the standards for a satisfactory rating under the small bank procedures, which evaluate bank performance under the following five criteria, as applicable.

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's average LTD ratio in comparison to those of regional peers. The average LTD ratio represents an 18-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	Headquarters	Asset Size (\$000s) as of September 30, 2020	Average LTD Ratio
FNB Oxford Bank	Oxford, Mississippi	\$440,348	69.6%
Regional Banks	Clarksdale, Mississippi	\$362,343	71.9%
	Baldwyn, Mississippi	\$395,545	65.2%
	Iuka, Mississippi	\$322,026	59.1%

Based on data from the previous table, the bank's level of lending is in line with that of other banks in the region. During the review period, the bank's quarterly LTD ratio experienced a generally stable trend with an average of 69.6 percent. In comparison, the average LTD ratios for the regional peers were similar; one peer's LTD ratio exhibited a generally stable trend as well, while one slightly increased and one slightly decreased during the same 18-quarter period. Therefore, compared to data from regional banks, the bank's average LTD ratio is reasonable given the bank's size, financial condition, and credit needs of its assessment areas.

Assessment Area Concentration

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

Lending Inside and Outside of Assessment Areas January 1, 2019 through December 31, 2019						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
Small Business	86	86.0%	14	14.0%	100	100%
	\$11,483	79.8%	\$2,900	20.2%	\$14,383	100%
1-4 Family Residential Real Estate	74	82.2%	16	17.8%	90	100%
	\$11,458	84.3%	\$2,130	15.7%	\$13,588	100%
TOTAL LOANS	160	84.2%	30	15.8%	190	100%
	\$22,941	82.0%	\$5,031	18.0%	\$27,972	100%

A majority of loans and other lending-related activities were made in the bank's assessment areas. As shown in the preceding table, 84.2 percent of the total loans were made inside the assessment areas, accounting for 82.0 percent of the dollar volume of total loans.

Geographic and Borrower Distribution

As displayed in the following table, overall performance by borrower's income/revenue profile is reasonable, based on the analyses of lending in the bank's two assessment areas.

Assessment Area	Loan Distribution by Borrower's Profile
Lafayette County	Reasonable
Lee County	Reasonable
OVERALL	REASONABLE

As displayed in the following table, the bank's overall distribution of lending by income level of census tract reflects poor penetration throughout the bank's two assessment areas subject to review.

Assessment Area	Geographic Distribution of Loans
Lafayette County	Reasonable
Lee County	Poor
OVERALL	POOR

The Lafayette County assessment area contained no low- or moderate-income census tracts and, therefore, carried less weight in the overall geographic distribution of loans rating.

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (May 9, 2016 through December 6, 2020).

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

LAFAYETTE COUNTY, MISSISSIPPI NONMSA ASSESSMENT AREA

(Full-Scope Review)

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

Bank Structure

The bank operates four of its five offices in this assessment area. Of the four offices, two are located in middle-income tracts and two are located in upper-income tracts. Since the last examination, the bank did not open any branches in this assessment area, but did close one limited-service office that was located in an upper-income tract. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area consists of Lafayette County in its entirety. This is the bank's primary assessment area and is located in northern Mississippi. Per 2015 ACS data, the assessment area population is 51,169. Of the 14 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked first in deposit market share, encompassing 22.7 percent of total deposit dollars. Notably, the bank currently holds a large portion of public deposits.

Credit needs in the assessment area, as noted primarily from community contact interviews, are centered on funding for small businesses and startups. Contacts noted that brick-and-mortar space for businesses is plentiful, but mostly out of reach for small businesses and startups. The area around Oxford, where the bank's main office is located, is home to the University of Mississippi. The university's enrollment remains around 18,600 students (roughly 36 percent of the Lafayette County population). One contact mentioned that it is common for entrepreneurial students from the university to stay in the area following graduation. The mix of college students and retirees has led to several successful retail and food/beverage startups in the area's recent history.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	0	3	6	1	10
	0.0%	0.0%	30.0%	60.0%	10.0%	100%
Family Population	0	0	2,885	7,229	229	10,343
	0.0%	0.0%	27.9%	69.9%	2.2%	100%

As shown in the preceding table, there are no LMI census tracts within the assessment area.

According to 2015 ACS data, the median family income for the assessment area was \$62,559. At the same time, the median family income for nonMSA Mississippi was \$43,897. More recently, the FFIEC estimated the 2019 median family income for nonMSA Mississippi to be \$47,800. The following table displays population percentages of assessment area families by income level compared to the nonMSA Mississippi as a whole.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Lafayette County	1,626	1,011	1,692	6,014	10,343
	15.7%	9.8%	16.4%	58.2%	100%
NonMSA Mississippi	94,570	65,672	68,539	167,156	395,937
	23.9%	16.6%	17.3%	42.2%	100%

As shown in the preceding table, 25.5 percent of the families in the assessment area are considered LMI, which is noticeably lower than the LMI family percentage of 40.5 percent in nonMSA Mississippi as a whole. The percentage of families living below the poverty threshold in the assessment area (12.6 percent) is also significantly lower than the nonMSA Mississippi level of 20.1 percent. Considering these factors, the assessment area appears more affluent than nonMSA Mississippi as a whole.

Housing Demographics

Based on housing values, income levels, and rental costs, homeownership in the assessment area is less affordable than nonMSA Mississippi as a whole. The median housing value for the assessment area (\$159,136) is significantly higher than the nonMSA Mississippi figure (\$84,318). The assessment area housing affordability ratio of 28.1 percent is also lower than that of nonMSA Mississippi (41.0 percent). Based on the housing values and affordability ratio comparisons, homeownership may be out of reach for many LMI families. Finally, the median gross rent for the assessment area of \$799 per month is higher than \$628 per month for nonMSA Mississippi as a whole.

Industry and Employment Demographics

The assessment area supports a diverse business community. According to 2019 Dun & Bradstreet data, 91.4 percent of total businesses in the assessment area have gross annual revenues of less than \$1 million. County business patterns indicate that there are 18,028 paid employees in the assessment area. By percentage of employees, the three largest job categories are accommodation and food services (24.2 percent), health care and social assistance (17.5 percent), and retail trade (16.2 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Mississippi as a whole.

Unemployment Levels				
Dataset	Time Period (Annual Average)			
	2017	2018	2019	YTD 2020 (8-month average)
Lafayette County	4.2%	3.9%	4.5%	6.6%
State of Mississippi	5.1%	4.8%	5.4%	8.6%

As shown in the table above, unemployment levels in the assessment area consistently remained lower than the state of Mississippi. For both the assessment area and the state, unemployment rates declined in 2018, before increasing in 2019 and 2020.

Community Contact Information

Information from two community contacts was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. Both interviews were conducted with individuals specializing in economic and small business development. The community contacts categorized the assessment area economy as healthy with moderate growth, particularly in the business and small business sectors.

Per the contacts, the region has fostered development of small businesses, investing in professional, scientific, and technical services, including building co-working spaces and innovation hubs, and supporting University of Mississippi faculty, staff, and students interested in pursuing entrepreneurial endeavors. One contact noted that outside of a few major funding sources, entrepreneurs have difficulty accessing enough capital to start or expand small businesses. Lack of adequate capital is exacerbated by unaffordable commercial space: the costs associated with brick-and-mortar space are high and act as a barrier to new and small business owners. One community contact noted additional credit barriers to newly formed small businesses include cash for down payments, creating sound financial plans, and specific business knowledge. The contacts agree that while the area has grown and the environment is healthy for small businesses, there is still a need for investment in small business programs, small business counseling, and financial literacy efforts.

Both contacts characterized local banks as successfully meeting the credit needs of the area. One contact indicated that the area provides an appropriate number of banks, where residents can choose between national, regional, or local institutions. Branches and ATMs are well dispersed

and accessible. The other contact noted that while online and alternative technology-based banking options have become more prevalent, brick-and-mortar banking offices in the area are still very important to the community, particularly in rural areas.

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

The overall distribution of loans reflects reasonable penetration among businesses of different revenue sizes and borrowers of different income levels. In addition, while the assessment area does not contain any LMI census tracts, the loan dispersion within its census tracts was reviewed and considered reasonable.

Loan Distribution by Borrower's Profile

Small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2019 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size Assessment Area: Lafayette County								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	30	51.7%	44.8%	\$3,388	40.0%	49.3%	91.4%
	Over \$1 Million/ Unknown	28	48.3%	55.2%	\$5,080	60.0%	50.7%	8.6%
	TOTAL	58	100.0%	100.0%	\$8,468	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	33	56.9%	91.1%	\$1,278	15.1%	31.0%	
	\$100,001– \$250,000	12	20.7%	4.3%	\$1,649	19.5%	15.6%	
	\$250,001– \$1 Million	13	22.4%	4.6%	\$5,541	65.4%	53.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	58	100.0%	100.0%	\$8,468	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	21	70.0%		\$766	22.6%		
	\$100,001– \$250,000	5	16.7%		\$633	18.7%		
	\$250,001– \$1 Million	4	13.3%		\$1,989	58.7%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	30	100.0%		\$3,388	100.0%		

While the bank's level of lending to small businesses with gross revenues of \$1 million or less (51.7 percent) is below the demographic figure (91.4 percent), it compares favorably to aggregate performance (44.8 percent). Therefore, the bank's level of lending to small businesses is reasonable.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$62,559 for the assessment area as of 2015). The following table shows the distribution of 1–4 family residential real estate loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2019 aggregate data for the assessment area is displayed.

Borrower Distribution of 1–4 Family Residential Real Estate Loans – 2019							
Assessment Area: Lafayette County							
Borrower Income Level	Bank Loans				Families	Aggregate Data	
	#	#%	\$	\$%	%	#%	\$ %
Low	1	2.2%	\$164	2.5%	15.7%	0.9%	0.3%
Moderate	3	6.7%	\$92	1.4%	9.8%	4.1%	1.8%
Middle	3	6.7%	\$251	3.8%	16.4%	11.6%	6.4%
Upper	38	84.4%	\$6,111	92.3%	58.1%	69.5%	64.4%
Unknown	0	0.0%	0	0.0%	0.0%	13.9%	27.1%
TOTAL	45	100.0%	\$6,617	100.0%	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (2.2 percent) is below the demographic figure (15.7 percent) but above aggregate performance (0.9 percent). Therefore, the bank's performance to low-income borrowers is reasonable. Similarly, the bank's level of lending to moderate-income borrowers (6.7 percent) is below the demographic figure (9.8 percent) but above aggregate lending (4.1 percent). Therefore, the bank's performance to moderate-income borrowers is reasonable. When considering performance in both income categories, the bank's overall distribution of 1–4 family residential real estate loans by borrower's profile in the assessment area is reasonable.

Geographic Distribution of Loans

Under the geographic distribution of loans analysis, emphasis is normally placed on the bank's performance in LMI geographies. However, the assessment area does not contain any LMI census tracts. As previously stated, the bank's assessment area is comprised of three middle-, six upper-, and one unknown income census tracts. Therefore, a detailed geographic distribution of loans analysis would not prove meaningful and was not performed as part of this evaluation. Nevertheless, the loan dispersion within the assessment area census tracts was reviewed, the results of which indicated that loan activity was adequately dispersed throughout the assessment area, consistent with demographics and bank structure. Therefore, the bank's geographic distribution of loans is reasonable in the Lafayette County assessment area.

LEE COUNTY, MISSISSIPPI NONMSA ASSESSMENT AREA (Full-Scope Review)

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

Bank Structure

The bank operates one of its five offices in this assessment area, a full-service facility located in a moderate-income census tract. Since the last examination, the bank did not open or close any branches in this assessment area. Based on its limited branch network and other service delivery systems, the bank is limited in its ability to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area consists of Lee County in its entirety, located in northeast Mississippi. Per 2015 ACS data, the assessment area population is 85,036. Of the 12 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 11th in deposit market share, encompassing only 0.2 percent of total deposit dollars.

Credit needs in the assessment area, as noted primarily from community contact interviews, include a mix of residential and small business loan products, with particular emphasis on funding for home purchase and renovation/repair loans. The area has older housing stock, with minimal housing development. Community contacts indicated that the housing stock within reach of LMI borrowers tends to be in need of renovations and repairs.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	2	8	8	1	19
	0.0%	10.5%	42.1%	42.1%	5.3%	100%
Family Population	0	1,815	8,631	11,914	0	22,360
	0.0%	8.1%	38.6%	53.3%	0.0%	100%

As shown in the preceding table, the assessment area contains no low-income and two moderate-income census tracts. While 10.5 percent of the census tracts in the assessment area are moderate-income geographies, only 8.1 percent of the family population resides in these tracts.

According to 2015 ACS data, the median family income for the assessment area was \$54,005. At the same time, the median family income for nonMSA Mississippi was \$43,897. More recently, the FFIEC estimates the 2019 median family income for nonMSA Mississippi to be \$47,800. The following table displays population percentages of assessment area families by income level compared to nonMSA Mississippi as a whole.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Lee County	4,170	2,939	3,681	11,570	22,360
	18.7%	13.1%	16.5%	51.7%	100%
NonMSA Mississippi	94,570	65,672	68,539	167,156	395,937
	23.9%	16.6%	17.3%	42.2%	100%

As shown in the preceding table, 31.8 percent of the families in the assessment area are considered LMI, which is lower than the LMI family percentage of 40.5 percent in nonMSA Mississippi. The percentage of families living below the poverty level in the assessment area (15.6 percent) is also lower than the level in the nonMSA Mississippi as a whole (20.1 percent). Considering these factors, the assessment area appears more affluent than nonMSA Mississippi as a whole.

Housing Demographics

Based on housing values, income levels, and rental costs, homeownership in the assessment area is less affordable than in nonMSA Mississippi as a whole. The median housing value for the assessment area (\$117,031) is higher than nonMSA Mississippi (\$84,318). The assessment area housing affordability ratio of 36.8 percent is also lower than that of nonMSA Mississippi (41.0 percent). Finally, the median gross rent for the assessment area of \$664 per month is slightly higher than the \$628 per month for nonMSA Mississippi. Community contacts confirmed that homeownership is out of reach for many of the assessment area's LMI residents.

Industry and Employment Demographics

The assessment area supports a diverse business community. According to 2019 Dun & Bradstreet data, 88.5 percent of total businesses in the assessment area have gross annual revenues of less than \$1 million. County business patterns indicate that there are 47,722 paid employees in the assessment area. By percentage of employees, the three largest job categories are manufacturing (19.0 percent), health care and social assistance (18.2 percent), and retail trade (14.5 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Mississippi.

Unemployment Levels				
Dataset	Time Period (Annual Average)			
	2017	2018	2019	YTD 2020 (8-month average)
Lee County	4.0%	3.9%	4.4%	9.1%
State of Mississippi	5.1%	4.8%	5.4%	8.6%

As shown in the table above, the assessment area had, until recently, a lower unemployment rate than the state of Mississippi. For the assessment area and Mississippi, unemployment rates decreased through 2018, and then increased in 2019 and 2020.

Community Contact Information

Information from three community contacts was referenced to help shape the performance context in which the bank's activities in this assessment area were evaluated. The community contact interviewees are individuals specializing in affordable housing, small business development, and specialized financing. The community contacts described the assessment area economy as stable, with potential for growth. The city of Tupelo is the prominent source of economic activity in the area, as it provides the largest industries and employers, and better access to jobs and healthcare. One contact noted that Lee County is more affluent than the surrounding area and supportive of small businesses and startups. The contact mentioned the presence of small business centers in Tupelo; nevertheless, the contact indicated the largest credit barriers for new small businesses include access to sufficient capital, sound business plans, and education (specifically, the knowledge and understanding of city ordinances and licensing requirements). Another contact stated that there have been few small business closings in the area since the beginning of the COVID-19 pandemic; however, the contact anticipates that economic conditions will worsen as government intervention programs expire.

One contact indicated a lack of affordable housing in the area. With older, neglected housing stock and very little new construction underway, homebuyers need financing for home repairs and renovations in addition to purchase loans. The contact stated that LMI borrowers find it difficult to qualify for both the purchase and home repair loans. In the opinion of the contact, additional barriers to homeownership for LMI residents exacerbate the issue, such as poor credit histories or the inability to set aside funds for down payments. Consequently, financing for affordable housing is a significant credit need in the assessment area.

One contact noted that while banking is accessible in the area, a large percentage of LMI residents tend to utilize other options, such as finance companies, payday lenders, title lenders, and check cashing facilities, to meet their financial needs. While banks try to be accommodating, low-income residents especially find it difficult to qualify for traditional bank products and services. The contact cited a need for collaboration between banks and community development organizations to provide financial products to low- and very low-income residents, such as United States Department of Agriculture 504 loans. Finally, the contacts described a need for homeownership counseling and small business counseling in the area.

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

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

Loan Distribution by Borrower's Profile

Small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2019 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Small Business Loans by Revenue and Loan Size								
Assessment Area: Lee County								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	21	75.0%	49.7%	\$1,983	65.8%	48.1%	88.5%
	Over \$1 Million/Unknown	7	25.0%	50.3%	\$1,032	34.2%	51.9%	11.5%
	TOTAL	28	100.0%	100.0%	\$3,015	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	18	64.3%	86.5%	\$557	18.5%	28.8%	
	\$100,001–\$250,000	7	25.0%	7.1%	\$1,036	34.4%	20.5%	
	\$250,001–\$1 Million	3	10.7%	6.4%	\$1,422	47.2%	50.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	28	100.0%	100.0%	\$3,015	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	15	71.4%		\$413	20.8%		
	\$100,001–\$250,000	4	19.0%		\$550	27.7%		
	\$250,001–\$1 Million	2	9.5%		\$1,020	51.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	21	100.0%		\$1,983	100.0%		

The bank's level of lending to small businesses with gross revenues of \$1 million or less (75.0 percent) is significantly better than aggregate lenders (49.7 percent) and compares reasonably well to the assessment area demographics estimate of businesses in Lee County with revenues of \$1 million of

less (88.5 percent). Therefore, the bank's level of lending to small businesses in the assessment area is excellent.

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC (\$54,005 for the assessment area as of 2015). The following table shows the distribution of 1–4 family residential real estate loans by borrower income level in comparison to family population income demographics for the assessment area. Additionally, 2019 aggregate data for the assessment area is displayed.

Borrower Distribution of 1–4 Family Residential Real Estate Loans							
Assessment Area: Lee County							
Borrower Income Level	Bank Loans				Families	Aggregate Data	
	#	#%	\$	\$%	%	#%	\$ %
Low	5	16.1%	\$1,245	25.3%	18.6%	2.3%	0.9%
Moderate	0	0.0%	0	0.0%	13.1%	11.9%	7.0%
Middle	6	19.4%	\$579	11.8%	16.5%	17.0%	14.2%
Upper	20	64.5%	\$3,097	62.9%	51.7%	51.1%	60.9%
Unknown	0	0.0%	0	0.0%	0.0%	17.6%	17.0%
TOTAL	31	100.0%	\$4,921	100.0%	100.0%	100.0%	100.0%

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (16.1 percent) is slightly below the demographic figure (18.6 percent) but noticeably outpaces the aggregate (2.3 percent), indicating excellent performance. Conversely, the bank's level of lending to moderate-income borrowers (0.0 percent) is considerably lower than both the demographic (13.1 percent) and the aggregate lending figure (11.9 percent). Therefore, the bank's performance to moderate-income borrowers is very poor. However, when considering performance in both income categories, the bank's overall distribution of 1–4 family residential real estate loans by borrower's profile in the assessment area is reasonable.

Geographic Distribution of Loans

As noted previously, the assessment area includes no low-income and two moderate-income census tracts, representing 10.5 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans reflects poor penetration throughout these LMI census tracts, based on the small business and 1–4 family residential real estate loan categories. The following table displays 2019 small business loan activity by geography income level compared to the location of businesses throughout the assessment area and 2019 small business aggregate data.

Geographic Distribution of Small Business Loans – 2019							
Assessment Area: Lee County							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate Data	
	#	#%	\$ 000s	\$ %		#%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	3	10.7%	\$158	5.2%	21.9%	21.8%	32.9%
Middle	9	32.1%	\$1,772	58.8%	30.9%	27.2%	23.2%
Upper	16	57.1%	\$1,086	36.0%	46.6%	45.3%	42.6%
Unknown	0	0.0%	\$0	0.0%	0.5%	5.7%	1.3%
TOTAL	28	100.0%	\$3,016	100.0%	100.0%	100.0%	100.0%

The bank's percentage of loans in moderate-income census tracts (10.7 percent) is noticeably less than both the demographic and aggregate figures (21.9 percent and 21.8 percent, respectively). Therefore, the bank's small business lending performance in moderate-income geographies is poor.

The following table displays the geographic distribution of 2019 1–4 family residential real estate loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Geographic Distribution of 1–4 Family Residential Real Estate Loans – 2019							
Assessment Area: Lee County							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate Data	
	#	#%	\$	\$%		#%	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	3.2%	218	4.4%	6.3%	5.3%	4.0%
Middle	6	19.4%	1,153	23.4%	35.7%	29.0%	23.7%
Upper	24	77.4%	3,550	72.1%	58.0%	65.6%	72.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	31	100.0%	4,921	100.0%	100.0%	100.0%	100.0%

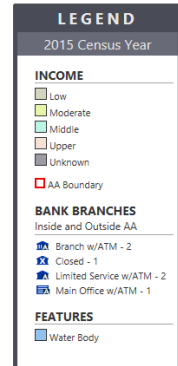
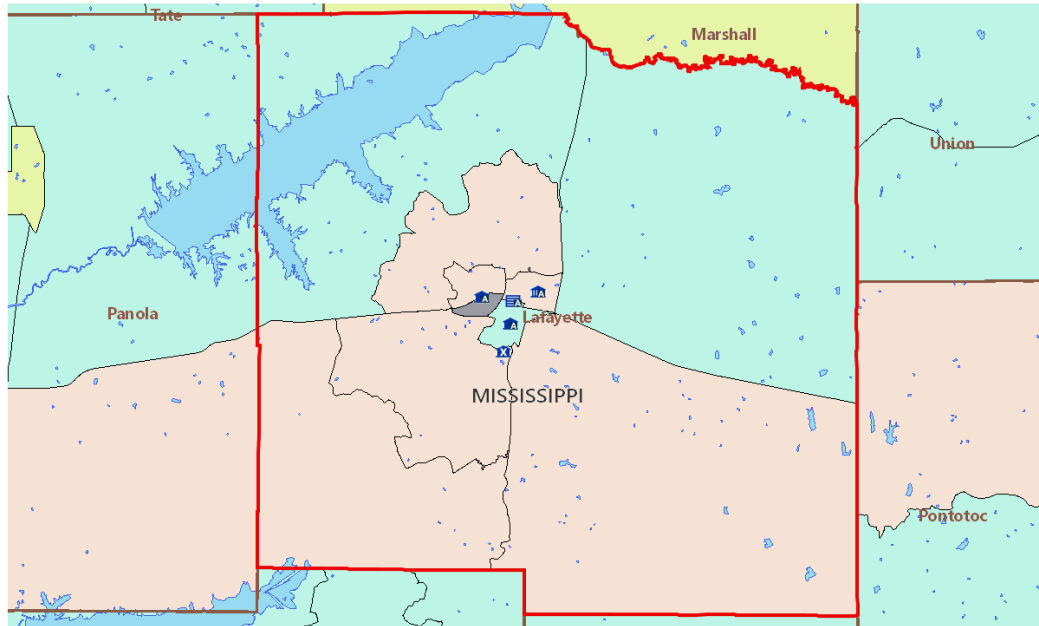
The bank's total penetration of moderate-income census tracts by number of loans (3.2 percent) is only slightly below both the demographic and aggregate figures (6.3 percent and 5.3 percent, respectively). Therefore, the analysis of 1–4 family residential real estate loans revealed reasonable lending performance to borrowers residing in moderate-income geographies.

ASSESSMENT AREA DETAIL

FNB Oxford - Oxford, MS 2020

Lafayette CO NonMSA, MS 2019

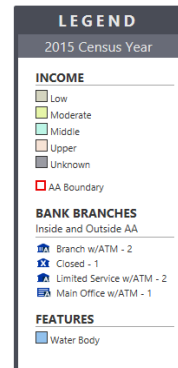
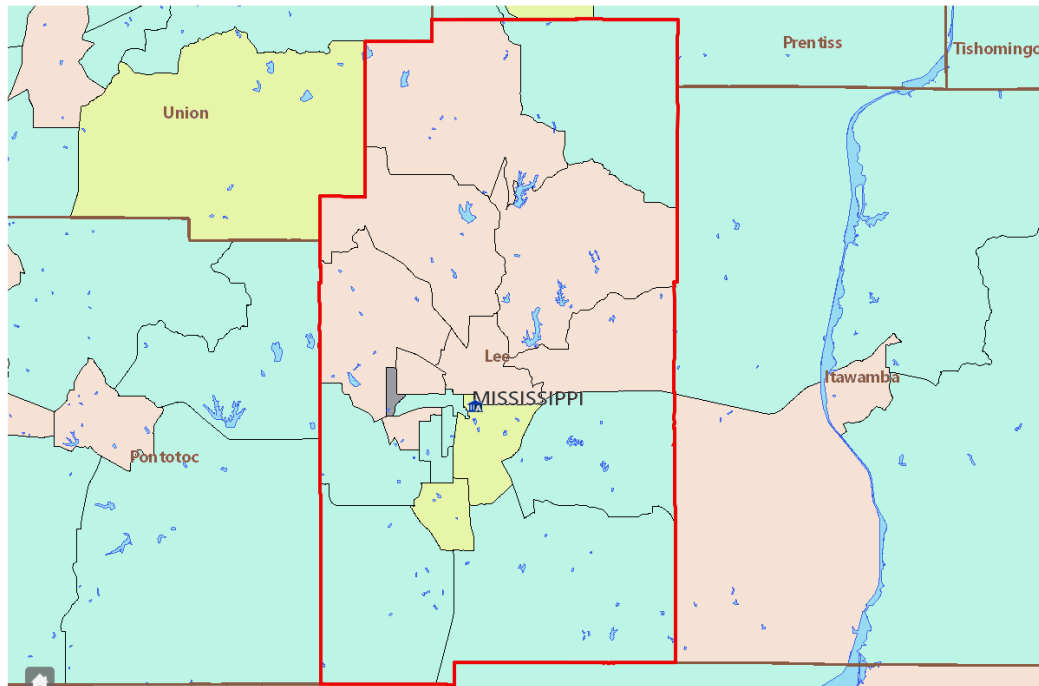
Internal FR



FNB Oxford - Oxford, MS 2020

Lee CO NonMSA, MS 2019

Internal FR



GLOSSARY

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

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

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

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

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

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

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

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders 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 (e.g., approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

FNB OXFORD BANK
LOCATION LISTINGS

MAIN OFFICE

101 COURTHOUSE SQ
OXFORD MS 38655

FNB TUPELO
A BRANCH OF FNB OXFORD

165 S COMMERCE STREET
TUPELO, MS 38804

SISK AVENUE BRANCH

700 SISK AVE
OXFORD MS 38655

SOUTH LAMAR BRANCH

2149 S LAMAR BLVD
OXFORD MS 38655

GEORGE G. "PAT" PATTERSON
PARKWAY

2770 George G. "Pat" Patterson Parkway
OXFORD, MS 38655

FNB WATER VALLEY
A BRANCH OF FNB OXFORD

400 N. MAIN STREET
WATER VALLEY, MS 38965

AUTOMATED TELLER MACHINE (ATM) LOCATIONS

TUPELO BRANCH

LOCATED ON THE EAST SIDE OF THE BRANCH

INTERACTIVE TELLER MACHINE (ITM)/AUTOMATED TELLER MACHINE (ATM)
LOCATIONS

MAIN OFFICE - LOCATED IN THE VESTIBULE OF MAIN OFFICE

TUPELO BRANCH - LOCATED IN THE VESTIBULE OF THE TUPELO BRANCH

SOUTH LAMAR BRANCH - LOCATED ON THE OUTSIDE LANE OF DRIVE THRU AREA

SISK AVENUE BRANCH - LOCATED ON THE OUTSIDE LANE OF THE DRIVE THRU AREA

GEORGE G. "PAT" PATTERSON PARKWAY - LOCATED ON THE INSIDE LANE OF THE DRIVE THRU AREA

GEOGRAPHIC BRANCH LOCATIONS

OXFORD:

Branch Location	MSA Code	State Code	County Code	Census Tract
101 Courthouse Square	N/A	28	071	9502.01
2770 George G. "Pat" Patterson Pkwy	N/A	28	071	9504.04
2149 South Lamar Blvd	N/A	28	071	9502.03
700 Sisk Ave	N/A	28	071	9502.01

Tupelo:

Branch Location	MSA Code	State Code	County Code	Census Tract
165 S. Commerce Street	N/A	28	081	9507.00

Water Valley:

Branch Location	MSA Code	State Code	County Code	Census Tract
400 N. Main Street	N/A	28	161	9502.00



2023 FFIEC Geocode Census Report

Address: 101 Courthouse Sq, Oxford, Mississippi, 38655

MSA: NA - NA (Outside of MSA)

State: 28 - MISSISSIPPI

County: 071 - LAFAYETTE COUNTY

Tract Code: 9502.01

Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
2023 Estimated Tract Median Family Income	\$147,808
2020 Tract Median Family Income	\$122,031
Tract Median Family Income %	230.23
Tract Population	3363
Tract Minority %	23.31
Tract Minority Population	784
Owner-Occupied Units	1032
1- to 4- Family Units	1779

Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$53,003
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
% below Poverty Line	24.34
Tract Median Family Income %	230.23
2020 Tract Median Family Income	\$122,031
2023 Estimated Tract Median Family Income	\$147,808
2020 Tract Median Household Income	\$85,691

Census Population Information

Tract Population	3363
Tract Minority %	23.31
Number of Families	1035
Number of Households	1633
Non-Hispanic White Population	2579
Tract Minority Population	784
American Indian Population	1
Asian/Hawaiian/Pacific Islander Population	131
Black Population	439
Hispanic Population	111
Other/Two or More Races Population	102

Census Housing Information

Total Housing Units	2111
1- to 4- Family Units	1779
Median House Age (Years)	38
Owner-Occupied Units	1032
Renter Occupied Units	601
Owner Occupied 1- to 4- Family Units	1019
Inside Principal City?	NO
Vacant Units	478



2023 FFIEC Geocode Census Report

Address: 700 Sisk Ave, Oxford, Mississippi, 38655

MSA: NA - NA (Outside of MSA)

State: 28 - MISSISSIPPI

County: 071 - LAFAYETTE COUNTY

Tract Code: 9502.01

Summary Census Demographic Information

Tract Income Level	Upper
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Census Housing Information

Total Housing Units	2111
1- to 4- Family Units	1779
Median House Age (Years)	38
Owner-Occupied Units	1032
Renter Occupied Units	601
Owner Occupied 1- to 4- Family Units	1019
Inside Principal City?	NO
Vacant Units	478



2023 FFIEC Geocode Census Report

Address: 2149 S Lamar Blvd, Oxford, Mississippi, 38655

MSA: NA - NA (Outside of MSA)

State: 28 - MISSISSIPPI

County: 071 - LAFAYETTE COUNTY

Tract Code: 9502.03

Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
2023 Estimated Tract Median Family Income	\$68,296
2020 Tract Median Family Income	\$56,385
Tract Median Family Income %	106.38
Tract Population	3218
Tract Minority %	38.44
Tract Minority Population	1237
Owner-Occupied Units	406
1- to 4- Family Units	965

Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$53,003
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
% below Poverty Line	33.40
Tract Median Family Income %	106.38
2020 Tract Median Family Income	\$56,385
2023 Estimated Tract Median Family Income	\$68,296
2020 Tract Median Household Income	\$55,191

Census Population Information

Tract Population	3218
Tract Minority %	38.44
Number of Families	701
Number of Households	1320
Non-Hispanic White Population	1981
Tract Minority Population	1237
American Indian Population	0
Asian/Hawaiian/Pacific Islander Population	125
Black Population	709
Hispanic Population	286
Other/Two or More Races Population	117

Census Housing Information

Total Housing Units	2280
1- to 4- Family Units	965
Median House Age (Years)	16
Owner-Occupied Units	406
Renter Occupied Units	914
Owner Occupied 1- to 4- Family Units	395
Inside Principal City?	NO
Vacant Units	960



2023 FFIEC Geocode Census Report

Address: Selected Tract

MSA: NA - NA (Outside of MSA)

State: 28 -

County: 071 - LAFAYETTE COUNTY

Tract Code: 9504.04

Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
2023 Estimated Tract Median Family Income	\$106,617
2020 Tract Median Family Income	\$88,024
Tract Median Family Income %	166.07
Tract Population	5134
Tract Minority %	30.33
Tract Minority Population	1557
Owner-Occupied Units	1519
1- to 4- Family Units	2260

Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$53,003
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
% below Poverty Line	12.89
Tract Median Family Income %	166.07
2020 Tract Median Family Income	\$88,024
2023 Estimated Tract Median Family Income	\$106,617
2020 Tract Median Household Income	\$76,127

Census Population Information

Tract Population	5134
Tract Minority %	30.33
Number of Families	1301
Number of Households	1858
Non-Hispanic White Population	3577
Tract Minority Population	1557
American Indian Population	2
Asian/Hawaiian/Pacific Islander Population	175
Black Population	1074
Hispanic Population	145
Other/Two or More Races Population	161

Census Housing Information

Total Housing Units	2482
1- to 4- Family Units	2260
Median House Age (Years)	25
Owner-Occupied Units	1519
Renter Occupied Units	339
Owner Occupied 1- to 4- Family Units	1519
Inside Principal City?	NO
Vacant Units	624



2023 FFIEC Geocode Census Report

Address: 165 S Commerce St, Tupelo, Mississippi, 38804

MSA: NA - NA (Outside of MSA)

State: 28 - MISSISSIPPI

County: 081 - LEE COUNTY

Tract Code: 9507.00

Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
2023 Estimated Tract Median Family Income	\$64,457
2020 Tract Median Family Income	\$53,217
Tract Median Family Income %	100.40
Tract Population	3596
Tract Minority %	60.01
Tract Minority Population	2158
Owner-Occupied Units	559
1- to 4- Family Units	1262

Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$53,003
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
% below Poverty Line	26.47
Tract Median Family Income %	100.40
2020 Tract Median Family Income	\$53,217
2023 Estimated Tract Median Family Income	\$64,457
2020 Tract Median Household Income	\$26,136

Census Population Information

Tract Population	3596
Tract Minority %	60.01
Number of Families	588
Number of Households	1388
Non-Hispanic White Population	1438
Tract Minority Population	2158
American Indian Population	2
Asian/Hawaiian/Pacific Islander Population	14
Black Population	1776
Hispanic Population	255
Other/Two or More Races Population	111

Census Housing Information

Total Housing Units	1709
1- to 4- Family Units	1262
Median House Age (Years)	56
Owner-Occupied Units	559
Renter Occupied Units	829
Owner Occupied 1- to 4- Family Units	559
Inside Principal City?	NO
Vacant Units	321



2023 FFIEC Geocode Census Report

Address: 400 N Main St, Water Valley, Mississippi, 38965

MSA: NA - NA (Outside of MSA)

State: 28 - MISSISSIPPI

County: 161 - YALOBUSHA COUNTY

Tract Code: 9502.00

Summary Census Demographic Information

Tract Income Level	Middle
Underserved or Distressed Tract	Yes*
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
2023 Estimated Tract Median Family Income	\$64,913
2020 Tract Median Family Income	\$53,594
Tract Median Family Income %	101.11
Tract Population	4253
Tract Minority %	43.43
Tract Minority Population	1847
Owner-Occupied Units	1042
1- to 4- Family Units	1933

Census Income Information

Tract Income Level	Middle
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$53,003
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$64,200
% below Poverty Line	20.71
Tract Median Family Income %	101.11
2020 Tract Median Family Income	\$53,594
2023 Estimated Tract Median Family Income	\$64,913
2020 Tract Median Household Income	\$42,361

Census Population Information

Tract Population	4253
Tract Minority %	43.43
Number of Families	1095
Number of Households	1686
Non-Hispanic White Population	2406
Tract Minority Population	1847
American Indian Population	1
Asian/Hawaiian/Pacific Islander Population	17
Black Population	1656
Hispanic Population	54
Other/Two or More Races Population	119

Census Housing Information

Total Housing Units	2014
1- to 4- Family Units	1933
Median House Age (Years)	45
Owner-Occupied Units	1042
Renter Occupied Units	644
Owner Occupied 1- to 4- Family Units	1042
Inside Principal City?	NO
Vacant Units	328

BRANCHES OPENED OR CLOSED

2011-----NONE

2012-----NONE

2013-----NONE

2014-----TUPELO BRANCH MOVED ON DECEMBER 5TH, 2014 FROM 337 E
MAIN ST STE B, TUPELO, MS 38804, TO 165 S COMMERCE ST,
TUPELO, MS 38804, GEO – LEE COUNTY 9507.00

2015-----NONE

2016-----NONE

2017-----NONE

2018-----100 AZALEA DRIVE, OXFORD, MS 38655 – CLOSED ON SEPTEMBER
26, 2018; GEO – LAFAYETTE COUNTY 9502.02

2019-----NORTH LAMAR BRANCH MOVED ON MAY 14, 2019 FROM 821
NORTH LAMAR BLVD, OXFORD, MS 38655 TO 700 SISK AVE,
OXFORD, MS 38655; GEO – LAFAYETTE COUNTY 9502.01

2020 -----NONE

2021 -----NONE

2022-----UNIVERSITY BRANCH MOVED ON MAY 16, 2022 FROM
1113 JACKSON AVE W., OXFORD, MS 38655 TO 2770 GEORGE G.
“PAT” PATTERSON PARKWAY, OXFORD, MS 38655; GEO –
LAFAYETTE COUNTY 9504.01

2023-----WATER VALLEY BRANCH OPENED ON NOVEMBER 13, 2023;
400 N. MAIN STREET, WATER VALLEY, MS 38965; GEO –
YALOBUSHA COUNTY 9502.00

LOAN TO DEPOSIT RATIO

YEAR 2022		YEAR 2023		YEAR 2024	
3/31/22	55.79%	3/31/23	56.12%	3/31/24	54.70%
6/30/22	52.21%	6/30/23	59.14%		
9/30/22	52.48%	9/30/23	59.08%		
12/31/22	54.51%	12/31/23	58.64%		

SERVICES OFFERED BY FNB OXFORD
MAIN OFFICE

Paying and receiving tellers
Automated Teller Machine (ATM) cards
Interactive Teller Machine
Debit cards
Wire Services
Lock Box/Cash Management Services
United States Savings Bonds-Redeem
Cashier's Checks
Loan Payments
Safe Deposit Boxes
Demand Deposit and Savings account products
Loan Products:

Commercial:

Construction
Farm Land
1-4 Family, First Deed of Trust
1-4 Family, Jr. Lien
Multi Family Real Estate
Non-Residential
Commercial/Industrial
Small Business Administration

Consumer Loans:

Auto
Trucks
Van
Recreational Vehicles
Boats
Mortgages
Property Improvements
Home Equity Line of Credit
Mobile Homes
Other personal family & household needs

Hours of Operation:

Monday - Thursday
8:30 a.m. - 4:30 p.m.

Friday
8:30 a.m. - 5:00 p.m.

ITM Hours of Operation:

Monday – Friday
7:00 a.m. - 7:00 p.m.

Saturday
9:00 a.m. - 12:00 p.m.

SERVICES OFFERED BY FNB OXFORD
SISK AVENUE BRANCH

Paying and receiving tellers
Automated Teller Machine (ATM) cards
Interactive Teller Machine
Debit cards
Wire Services
United States Savings Bonds - Redeem
Cashier's Checks
Loan Payments
Demand Deposit and Savings account products as identified in our disclosure
Loan Products:

Commercial:

Construction
Farm Land
1-4 Family, First Deed of Trust
1-4 Family, Jr. Lien
Multi Family Real Estate
Non-Residential
Commercial/Industrial
Agriculture
Small Business Administration

Consumer Loans:

Auto
Trucks
Van
Recreational Vehicles
Boats
Mortgages
Property Improvements
Home Equity Line of Credit
Mobile Homes
Other personal family & household needs

Hours of Operation:

Monday - Thursday
8:30 a.m. - 4:30 p.m.

Friday
8:30 a.m. - 5:00 p.m.

ITM Hours of Operation:

Monday – Friday
7:00 a.m. - 7:00 p.m.

Saturday
9:00 a.m. - 12:00 p.m.

SERVICES OFFERED BY FNB OXFORD
MEDICAL CENTER BRANCH

Paying and receiving tellers
Automated Teller Machine (ATM) cards
Interactive Teller Machine (ITM)
Wire Services
Debit cards
United States Savings Bonds - Redeem
Cashier's Checks
Loan Payments
Demand Deposit and Savings account products as identified in our disclosure
Loan Products:
Consumer Loans:

- Auto
- Trucks
- Van
- Recreational Vehicles
- Boats
- Other personal family & household needs

Branch Hours of Operation:

Monday - Thursday
8:30 a.m. - 4:30 p.m.

Friday
8:30 a.m. - 5:00 p.m.

ITM Hours of Operation:

Monday – Friday
7:00 a.m. - 7:00 p.m.

Saturday
9:00 a.m. - 12:00 p.m.

SERVICES OFFERED BY FNB OXFORD
GEORGE G. "PAT" PATTERSON PARKWAY BRANCH

Paying and receiving tellers
Automated Teller Machine (ATM) cards
Interactive Teller Machine
Debit cards
Wire Services
United States Savings Bonds - Redeem
Cashier's Checks
Loan Payments
Demand Deposit and Savings account products as identified in our disclosure
Loan Services:
 Consumer Loans:
 Auto
 Trucks
 Van
 Recreational Vehicles
 Boats
 Other personal family & household needs

Hours of Operation:

Monday - Thursday
8:30 a.m. - 4:30 p.m.

Friday
8:30 a.m. - 5:00 p.m.

Hours of ITM Operation:

Monday – Friday
7:00 a.m. - 7:00 p.m.

Saturday
9:00 a.m. - 12:00 p.m.

SERVICES OFFERED BY FNB TUPELO
A BRANCH OF FNB OXFORD

Paying and receiving tellers
Automated Teller Machine (ATM) cards
Interactive Teller Machine
Debit cards
Wire Services
Cashier's Checks
United States Savings Bonds-Redeem
Demand Deposit and Savings account products as identified in our disclosure
Certificate of Deposits
Loan Payments
Loan Products:
 Commercial:
 Construction
 Farm Land
 1-4 Family, First Deed of Trust
 1-4 Family, Jr. Lien
 Multi Family Real Estate
 Non-Residential
 Commercial/Industrial
 Agriculture
 Small Business Administration
 Consumer Loans:
 Auto
 Trucks
 Van
 Recreational Vehicles
 Boats
 Mortgages
 Property Improvements
 Home Equity Line of Credit
 Mobile Homes
 Other personal family & household needs

Hours of Operation:

Monday - Thursday
8:30 a.m. - 4:30 p.m.

Friday
8:30 a.m. - 5:00 p.m.

Hours of ITM Operation:

Monday – Friday
7:00 a.m. - 7:00 p.m.

Saturday
9:00 a.m. - 12:00 p.m.

SERVICES OFFERED BY FNB WATER VALLEY
A BRANCH OF FNB OXFORD

Paying and receiving tellers

Debit cards

Wire Services

United States Savings Bonds - Redeem

Cashier's Checks

Loan Payments

Demand Deposit and Savings account products as identified in our disclosure

Loan Services:

Commercial:

Construction

Farm Land

1-4 Family, First Deed of Trust

1-4 Family, Jr. Lien

Multi Family Real Estate

Non-Residential

Commercial/Industrial

Agriculture

Small Business Administration

Consumer Loans:

Auto

Trucks

Van

Recreational Vehicles

Boats

Mobile Homes

Other personal family & household needs

Hours of Operation:

Monday - Thursday

8:30 a.m. - 4:30 p.m.

Friday

8:30 a.m. - 5:00 p.m.

Business Checking Accounts

First Business Checking

Looking for a basic checking account for your small business?

Minimum Opening Deposit

\$100

Monthly Fee

\$8

Minimum Daily Balance Required to Avoid Fee

\$1,500

Interest Earned

No

Commercial Checking

Has your small business outgrown your current checking account benefits?

Minimum Opening Deposit

\$100

Monthly Fee

\$6 plus 12¢ for every debit & 6¢ for every item deposited

Minimum Daily Balance Required to Avoid Fee

N/A

Interest Earned

No

Non-Profit Checking

Are you a non-profit looking for an account that combines the benefit of earning interest with the convenience of commercial checking?

Minimum Opening Deposit

\$1,000

Monthly Fee

\$6

Minimum Daily Balance Required to Avoid Fee

\$1,000

Interest Earned

Yes \$1,000 minimum daily balance required to earn interest

Business Checking Accounts

Commercial FNB Money Market

Interested in putting your excess funds to work?

Minimum Opening Deposit

\$2,500

Monthly Fee

\$10

Minimum Daily Balance Required to Avoid Fee

\$2,500

Interest Earned

Yes \$2,500 minimum daily balance required to earn interest

Business Savings Accounts

SEP IRA

A Simplified Employee Pension (SEP) IRA is available to small business owners who provide retirement savings options for themselves as well as their employees. The SEP IRA is strictly employer-funded and is ideal for larger annual contributions.

Minimum Opening Deposit

\$1,000

Monthly Fee

N/A

Terms

For small business owners

Interest Rate

Rates based on term

SIMPLE IRA

The Savings Incentive Match Plan (SIMPLE) IRA is available to small businesses with 100 employees or less. The SIMPLE IRA is a retirement savings option that is employee-funded with a matching contribution made by the employer.

Minimum Opening Deposit

\$1,000

Monthly Fee

N/A

Terms

For small business owners

Interest Rate

Rates based on term

Certificates of Deposit

Certificates of deposit (CD) are popular savings vehicles that offer a variety of terms to meet your needs.

Minimum Opening Deposit

\$1,000

Monthly Fee

N/A

Terms

May vary between 1 month to 5 years

Interest Rate

Rates based on term

Business Credit Cards



Issued by ServisFirst Bank

The Business Credit Card comes with our powerful online account management capabilities that let you oversee your business activity at a glance by allowing administrators to manage their company's account and individual users to view and manage their cards.

Platinum Benefits Card

- No annual fee
- Annual Percentage Rate (APR) based on Wall Street Journal Prime Rate
- Visa® Zero Liability
- Manage business expenses 24/7 through business.cardservices.bank

Cash Back Rewards Card

- \$79 annual fee
- 1% Cash back on all qualifying purchases up to \$100,000 annually
- Annual Percentage Rate (APR) based on Wall Street Journal Prime Rate
- Visa® Zero Liability
- Manage business expenses 24/7 through business.cardservices.bank

Manage Your Business Expenses with our new and improved Card Management website

- Allows for multiple roles including a Program Administrator to oversee entire company, Reporting Administrator and Individual Cardholder access that allows cardholders to view their activity.
- View and download Statements, view current and pending transactions with a breakdown by spend categories, and make one-time or reoccurring payments.
- Manage individual cards with key features such as lock and unlocked card, close card, replaced damaged or lost card, set travel alerts, manage user spend limits, make a payment to an individual card to free up availability, download the individual cardholder statement, create merchant category code restrictions and much more.

Current cardholders: Visit business.cardservices.bank to log

ServisFirst Bank is the credit card issuer. All applications subject to ServisFirst Bank's Underwriting guidelines.

Lost or Stolen Credit Card?

Please call the ServisFirst Bank line at (888) 999-3340.

Business Loans

Looking for flexibility, creativity and local decision making to meet your business lending needs?

You will find it at FNB Oxford. We understand that every business is different and has different needs. Whether you are just getting started or if you have a business that has been around for generations, we would welcome the opportunity to provide you lending solutions. We offer an array of loan products including:

- Commercial Mortgage Loans
- Construction Loans
- Equipment Financing
- Working Capital Lines of Credit
- [Agriculture Loans](#)
- and many more to suit your needs!

Best of all, we are locally owned and operated so all of our credit decisions are made in Oxford and Tupelo by people that know and understand the market in which you do business.

Business Banking Services

Online Banking

Since you're online with us right now, you already know how convenient Online Banking can be! Our basic business Online Banking services are provided to our customers at no monthly fee.

ACH Origination - Deposits and Payments

Conveniently and securely initiate Direct Deposits and Direct Payments reducing the hassle and cost of paper transactions. This service will allow you to send and receive electronic payments rapidly, accurately, and confidentially, so that you may pay employees or vendors, or collect funds from your customers.

Lockbox / Remittance Banking

Save valuable resources by shifting the workload of accounts receivable to us and to speed deposit processing. With this service, payments are mailed to a local PO Box allowing us to efficiently and accurately process and deposit funds to your account daily, turning incoming receivables into usable cash with maximum speed.

Merchant Card Service

Expand your business by offering your customers the convenience of electronic payments. Your business will benefit from our safe, secure, and timely payment options. We accept a wide range of

payment types with a number of payment solutions, including point-of-sale, e-commerce shopping carts, and wireless mobile terminals.

Remote Deposit Capture

If you deposit several checks a day, Remote Deposit Capture is the perfect solution for you. RDC will help streamline your business's daily routine by allowing you to make deposits remotely from your place of business. RDC will enable you to save time and money by making your daily deposits without leaving your office.

Electronic Statements

Have your bank account statements delivered electronically – saving the environment and saving you time! E-statements are securely delivered through FNB's Online Banking service.

Interactive Teller Machine

Not able to make it to the bank during hours, but still want to bank face-to-face with a real person? The iTM is available at select locations to serve you.

Electronic Bill Pay

Save yourself some time as well as the cost of stamps. Up to 15 bills to be paid each month to any vendor at no charge. Additional payments can be made for only 85¢ per item.

Wire Transfer Services

Need to transfer money fast to another person, bank, or business? We can assist you with a wire transfer.

FNB Business Debit Card

Your FNB Debit Card is accepted virtually everywhere deducting purchases directly from your checking account.

FNB on CD/FNB on USB

Increase the ease of reconciling accounts by using FNB on CD or FNB on USB. You may view or print your statements, individual transactions, checks, deposit slips and deposited items easily from your computer.

Sweep Accounts

Set up automatic transfers between multiple accounts, allowing you to maintain desired balances and maximize the interest earned. Contact us to discuss which type of sweep account is best for you!

Business Mobile Banking

FNB Business Mobile Banking provides all the convenient services you have through FNB Business Online Banking and is available for both Android and iOS.

Mobile Deposit

Mobile Deposit is a secure and easy way to deposit a check from virtually anywhere.

Enrich - Financial Wellness Resources

Ever have questions about financial topics but don't know who to trust? We've partnered with ENRICH to offer customers, employees, and greater community FREE financial wellness resources.

Personal Checking Accounts

FNB Simple Choice

When you need a basic checking account, the choice is simple.

Minimum Opening Deposit

\$25

Monthly Fee with E-Statements*

\$0* extra \$2 fee for paper statements

Minimum Daily Balance Required to Avoid Fee

N/A

Interest Earned

No

FNB Preferred Choice

Need a checking account that can earn you interest?

Minimum Opening Deposit

\$1,000

Monthly Fee with E-Statements*

\$10* \$2 fee for paper statements

Minimum Daily Balance Required to Avoid Fee

\$1,000

Interest Earned

Yes \$1,500 minimum daily balance required to earn interest

FNB Money Market

Want to enjoy the benefits of earning interest with the flexibility that allows you to have access to your money?

Minimum Opening Deposit

\$2,500

Monthly Fee with E-Statements*

\$10 *extra \$2 fee for paper statements

Minimum Daily Balance Required to Avoid Fee

\$2,500

Interest Earned

Yes \$2,500 minimum daily balance required to earn interest

Personal Savings Accounts

First Savings

Savings account for any walk of life.

Minimum Opening Deposit

\$25

Monthly Fee

\$0

Terms

N/A

Interest Rate

Contact for current rate information

Certificate of Deposit

Save according to your terms.

Minimum Opening Deposit

\$1,000

Monthly Fee

\$0

Terms

May vary between 1 month to 5 years

Interest Rate

Rates based on term

Traditional IRA

Save with tax-deferred earnings and a possible tax credit. Consult your tax advisor for additional information.

Minimum Opening Deposit

\$1,000

Monthly Fee

\$0

Terms

For individuals

Interest Rate

Rates based on term

Personal Savings Accounts

Roth IRA

Non-tax deductible retirement option that offers tax-free earnings after meeting certain IRS requirements. Consult your tax advisor for additional information.

Minimum Opening Deposit

\$1,000

Monthly Fee

\$0

Terms

For individuals

Interest Rate

Rates based on term

SEP IRA

A Simplified Employee Pension (SEP) IRA is available to small business owners who provide retirement savings options for themselves as well as their employees. The SEP IRA is strictly employer-funded and is ideal for larger annual contributions.

Minimum Opening Deposit

\$1,000

Monthly Fee

\$0

Terms

For individuals

Interest Rate

Rates based on term

Personal Loans

When you've made a personal investment decision, the last thing you need is a long wait for financing. At FNB Oxford, our Loan Officers will handle your borrowing request quickly and provide you with expert advice and guidance. Everyone has different goals and dreams; we take the time to learn yours. That's why we offer a full range of loans to meet your needs. From home improvements to vacations to paying those unexpected medical bills, we'll work with you to find the best way to help.

Auto Loans

When you're ready to get behind the wheel of a new or used vehicle, our loan officers are ready to make it happen. We offer competitive auto loans based on the year model and purchase price of the vehicle you're buying. Make car shopping easier. Come see us to get pre-qualified before visiting the dealership.

Home Equity Line of Credit

If you have equity in your home, we can turn your dreams into reality with a home equity loan. Put in a pool, spruce up the den, or buy the kids a car with our comfortable loan terms. Best of all, your interest may be tax deductible. Consult your tax advisor for additional information.

Real Estate Loans

You find the right house, investment property, or land; we'll help you find the right loan. With our competitive rates, you'll want to check with us first on your purchase, refinance, construction, or home improvement loan. We offer an array of residential mortgage loan options and would love the opportunity to tailor a loan to suit your needs.

Mortgages

When you've found the right house, investment property, or land, FNB is ready to help you find the right loan. With our competitive rates, you'll want to check with us first on your purchase, refinance, construction, or home improvement loan. FNB offers an array of residential mortgage loan options, including:

- **Conventional Loans**
Conventional loans typically meet most homebuyers' needs. Private mortgage insurance (PMI) is required with down payments less than 20% of value of the home.
- **Fixed Rate Mortgage Loans**
Over the life of the loan, the interest rate remains the same. A variety of loan terms are available.
- **Construction-to-Permanent Loan Programs**
Building your new home? This program helps finance your build and converts to a permanent loan when construction is complete. This loan features a one-time closing.
- **Construction Loans**
If you are planning to build your home and eventually seek out a conventional mortgage, there are programs in place for this as well. A construction loan offers the ability to draw funds as they are needed to complete the construction of your home.
- **Jumbo Loans**
Thinking about your dream home? Home prices that exceed the amount for a conventional conforming mortgage loan may qualify for a jumbo loan.
- **Portfolio Loans**
Some borrowers may require a customized loan solution. When a conventional loan might not be a good fit, portfolio loan offerings can provide further options.
- **FHA Home Mortgage Loans**
Popular with first-time home buyers, FHA Home Mortgages offer a low down payment with fixed monthly payments. FHA loans are insured by the Federal Housing Administration.
- **Rural Development (USDA) Fixed Rate Mortgage**
The Rural Development Mortgage provides options for low- to moderate-income borrowers wishing to purchase homes in eligible rural and suburban areas.
- **VA Fixed Rate Mortgages**
Guaranteed by the Department of Veteran Affairs, this program is available to eligible United States service members and veterans. For VA Mortgages there is usually low or no down payment, no PMI requirement, and a fixed monthly payment schedule.

Personal Credit Cards

Issued by ServisFirst Bank

The Personal Credit Card lets you choose between a full 1% cash back, no limit on rewards for qualifying purchases or the buying power of Platinum benefits. Both options come with a low spending rate and valuable cardmember benefits.

Platinum Benefits Card

- No annual fee
- Annual Percentage Rate (APR) based on Wall Street Journal Prime Rate
- 0% intro APR on purchases for the first 7 billing cycles after account opening
- Manage expenses 24/7 through consumer.cardservices.bank
- Contactless and Mobile Wallet enabled

Cash Back Rewards Card

- \$35 annual fee
- No cap on cash back, get 1% cash back on every dollar you spend
- Annual Percentage Rate (APR) based on Wall Street Journal Prime Rate
- Manage expenses 24/7 through consumer.cardservices.bank
- 0% intro APR on purchases for the first 7 billing cycles after account opening
- Contactless and Mobile Wallet enabled

Manage Your Expenses with our new and improved Card Management website

- Receive real time alerts on all purchases, select purchases or when a card transaction is attempted but declined.
- View your purchases, add memos, and tag your purchases for easy tracking.
- Manage your card at your fingertips. Activate your card, set card PIN, or report your lost/stolen cards.

Quick Links:

Current cardholders: Visit consumer.cardservices.bank to login.

Do I qualify? – [Quick Application](#)

[Joint Application](#)

ServisFirst Bank is the credit card issuer. All applications subject to ServisFirst Bank's Underwriting guidelines.

CardValet®

Take advantage of managing your business or personal card on the go with the Mobile app, CardValet®. This App allows you to manage your credit card anytime, anywhere, using your Mobile Device. The app is available on the App Store and on Google Play. To learn more visit: www.cardvalet.com.

Want to learn about Business Credit Card options?

Lost or Stolen Credit Card?

Please call the ServisFirst Bank line at (888) 999-3340.



Personal Banking Services

Online Banking

Since you're online with us right now, you already know how convenient Online Banking can be! Our basic personal Online Banking services are provided to our customers at no monthly fee.

Mobile Banking

FNB Mobile provides all the convenient services you have through Online Banking and is available for both Android and iOS.

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Not able to make it to the bank during hours, but still want to bank face-to-face with a real person? The iTM is available at select locations to serve you.

FNB Debit Card

Your FNB Debit Card is accepted virtually everywhere deducting purchases directly from your checking account.

Safe Deposit Boxes

Need a safe place to store your important papers and documents? FNB Oxford's Main Office has safe deposit boxes to keep these items safe and secure. For a minimal annual fee, allow us to secure what's important to you.

Electronic Bill Pay

Save yourself some time as well as the cost of stamps. Up to 15 bills to be paid each month to any vendor at no charge. Additional payments can be made for only 85¢ per item.

Personal Banking Services

Wire Services

Need to transfer money fast to another person, bank, or business? We can assist you with a wire transfer.

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Increase the ease of reconciling accounts by using FNB on CD or FNB on USB. You may view or print your statements, individual transactions, checks, deposit slips and deposited items easily from your computer.

Mobile Deposit

Mobile Deposit is a secure and easy way to deposit a check from virtually anywhere.

Enrich - Financial Wellness Resources

Ever have questions about financial topics but don't know who to trust? We've partnered with ENRICH to offer customers, employees, and greater community FREE financial wellness resources.

ASSESSMENT AREA

The FNB Oxford Bank's assessment area for (078) Lafayette County consists of 15 Census Tracts:

9501.00	9504.03
9502.01	9504.04
9502.03	9505.02
9502.04	9505.04
9503.01	9505.05
9503.03	9505.06
9503.04	9505.07
9504.02	

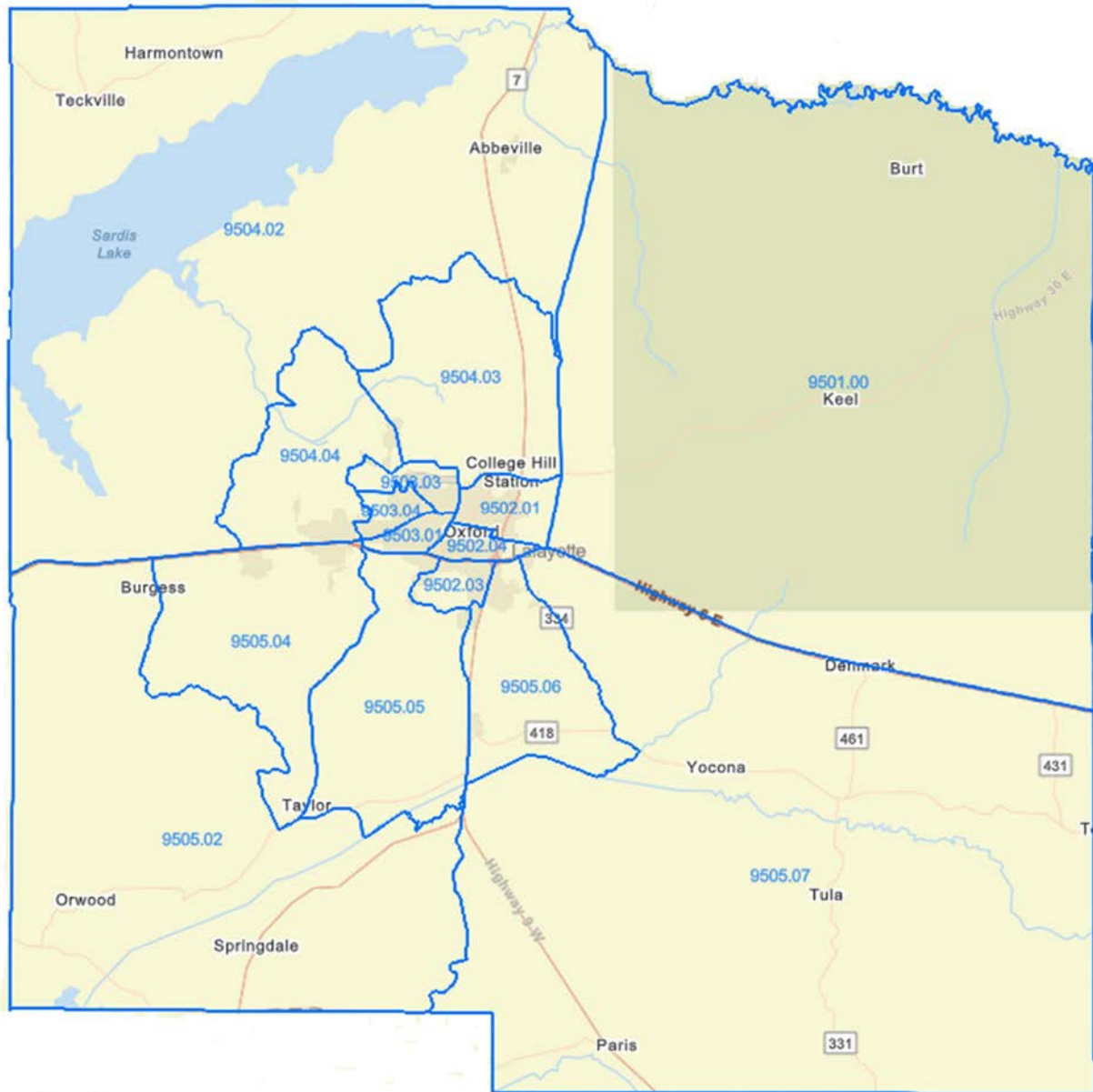
The FNB Oxford Bank's assessment area for FNB Tupelo Bank, A Branch of FNB Oxford Bank located, in (081) Lee County consists of 23 census tracts:

9501.01	9506.01
9501.02	9506.02
9502.02	9507.00
9502.03	9508.00
9502.04	9509.01
9503.01	9509.02
9503.02	9510.01
9504.01	9510.02
9504.03	9511.01
9504.04	9511.02
9505.01	9800.00
9505.02	

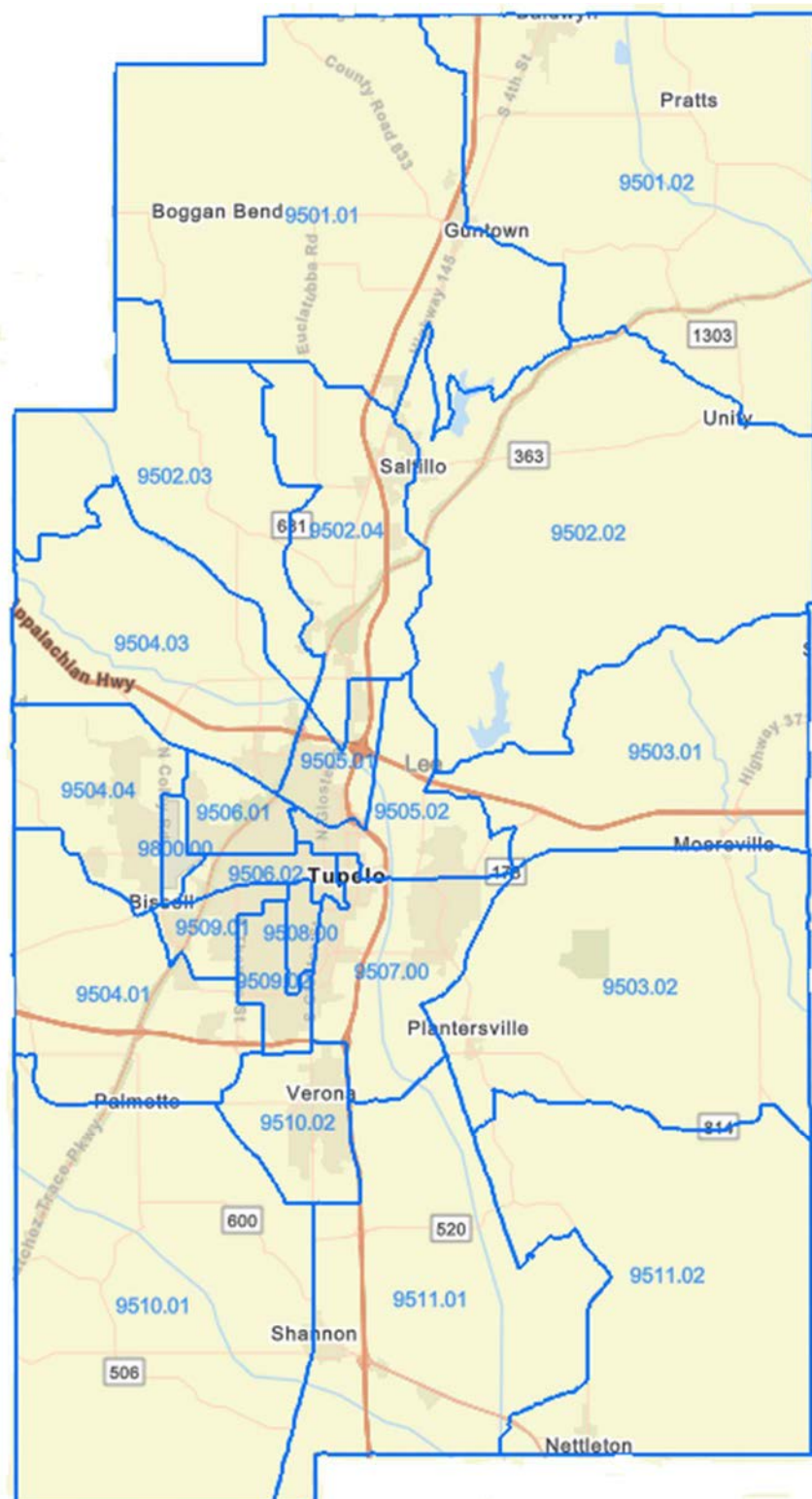
The FNB Oxford Bank's assessment area for FNB Water Valley Bank (opened November 13, 2023), A Branch of FNB Oxford Bank located, in (161) Yalobusha County consists of 5 census tracts:

9501.00	9503.02
9502.00	9999.99
9503.01	

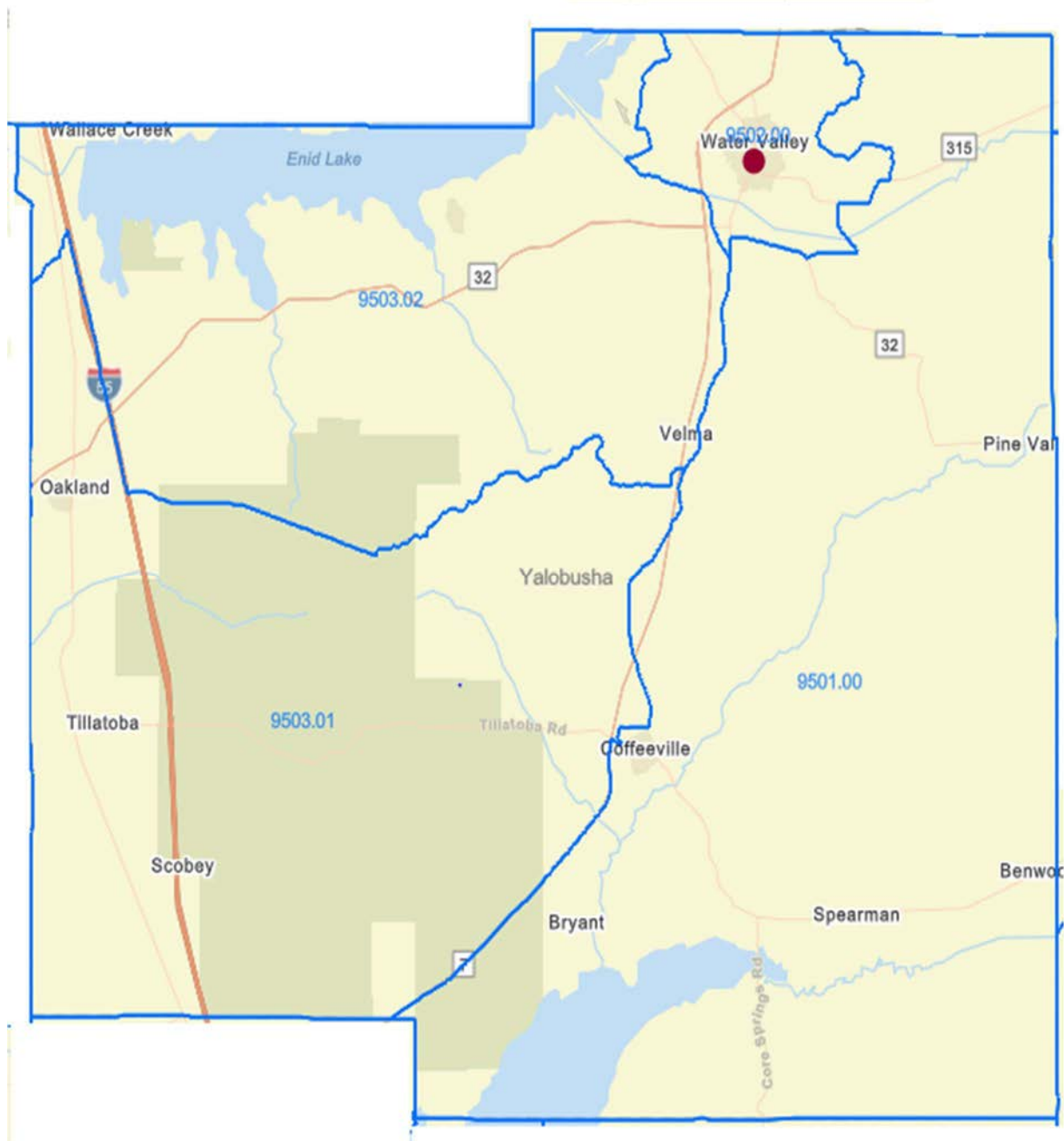
Lafayette County



Lee County



Yalobusha County



FFIEC.Gov website shows 5 census tracts. I have not been able to locate an updated map to show census tract 9999.99 at this time. The map will be replaced once tract boundary lines are clarified.

**FNB OXFORD BANK
OXFORD, MISSISSIPPI**

POLICY AND PROCEDURE ON BRANCH CLOSINGS

In recognition of its responsibilities under Section 228 of FDICIA as amended by Section 106 of the Riegle-Neal Interstate Banking and Branching Efficiency Act of 1994 and again by the Economic Growth and Regulatory Paperwork Reduction Act of 1996, the Bank has adopted this policy and procedure for branch closings.

Introduction

Federal law, 12 USC 1831r-1, requires an insured depository institution to submit 90 days' advance notice of any proposed branch closing to its federal regulator and to customers at specified times before the closing date. A final notice to the Federal Reserve is required after every branch closing, relocation, and consolidation. A state member bank must file a 90-day advance branch closing notice whenever it proposes to close a traditional brick-and-mortar branch or any similar banking facility, at which deposits are received, checks paid, or money lent. Main offices, remote service units, ATM/iTM's, loan production offices, night depositories, and temporary branches are not branches for purposes of 12 USC 1831r-1 and do not require the advance 90-day branch closing notice.

In addition, no branch bank in Mississippi may be discontinued or abandoned without first obtaining the consent in writing of the State Banking Commissioner. (§ 81-7-13 Mississippi Code) Once approval is obtained, branch banks may be moved from one municipality to another within certain restrictions.

Branch closing rules require advance branch closing notices when:

- A branch is closed as a result of a merger, consolidation, or other form of acquisition.
- Branch relocations and consolidations that do not meet the short-distance relocation definition in 12 CFR 5.3(l).

Advance branch closing notices are not required when:

- An ATM/iTM, remote service unit, night depository, loan or deposit production office, main office, or a temporary branch is closed.
- A branch is closed in connection with an emergency acquisition or any assistance provided by the Federal Deposit Insurance Corporation pursuant to 12 USC 1823(c).
- Services offered at a branch are reduced, but the resulting facility remains a branch under the branch closing rules; for example, branch hours of operation are reduced.
- The closing meets the branch consolidation or short-distance relocation definition in 12 CFR 5.3(l)

Decision Process

The Board of Directors may consider the closing of an existing branch for a number of reasons, including but not limited to, failing profitability, shifts in population or demographics, existence of other banking facilities which meet the public's needs, the need for physical replacement of the branch facility, or any other reason derived through the application of sound business practices. The decision process will be recorded in the minutes of the Board.

**FNB OXFORD BANK
OXFORD, MISSISSIPPI**

POLICY AND PROCEDURE ON BRANCH CLOSINGS

Application Process

Advance Branch Closing Notice - Should the bank desire to close a branch office, advance notice must be provided to the Federal Reserve and the State Banking Commission. The notification is a two-step process. The first step is a 90-day advance notice to the Federal Reserve Bank and to bank customers. The second step is a final branch closing notice to the Federal Reserve Bank with the effective date of the closing. Only a final branch closing notice is required for offices or facilities not considered branches under the branch closing rules (for example, a temporary branch, a night depository or branch consolidation). The notice must include a statement of the reasons for the decision to close the branch and supporting statistical or other relevant information consistent with the bank's written policy for branch closings. The bank's advance notice to the Federal Reserve Bank should contain all of the information contained in the sample notice (see the "Joint Policy Statement on Branch Closing Notices and Policies"; Advance Branch Closing and Downgrade Notice). This includes all of the following items:

- * Identification of the branch to be closed.
- * The proposed date of closing.
- * A detailed statement of the reasons for closing the branch.
- * Statistical or other information that support the reasons for closing the branch, consistent with the bank's written policies on branch closings.

Unless an exception applies, the bank must notify its customers of the proposed closing by mailing notices to them at least 90 days prior to the closing date. A copy of the notice sent to customers also must be forwarded to the Federal Reserve Bank of St. Louis. In addition, the bank shall post notice to branch customers in a conspicuous manner on the branch premises for at least 30 days prior to its closing date. In the case of a mobile branch, the notice shall be posted on a conspicuous place on the vehicle. The notice shall remain posted in the branch premises until the branch is closed. The notice should state the proposed date of closing and identify another location where customers can obtain service after that date or provide a telephone number **those** customers can call to learn about alternative sites. An institution may revise the notice to extend the projected closing date without triggering a new thirty-day notice period.

Interstate Branching

If, at a future date, the Bank should open a branch in another state, additional procedures will be added to this policy to reflect the additional requirements associated with interstate banks.

Specific Requirements

Additional guidance for some specific branch closings is provided in this section. The following table illustrates the specific requirements for various closings

**FNB OXFORD BANK
OXFORD, MISSISSIPPI**

POLICY AND PROCEDURE ON BRANCH CLOSINGS

	Advance Branch Closing Notice	Final Branch Closing Notice
Brick-and-Mortar Branch Closing	Yes	Yes
Branch Downgrade to ATM	Yes	Yes
Branch Downgrade to Night Depository	Yes	Yes
Mobile Branch Closing	Yes	Yes
Branch Consolidation	No	Yes
Short-Distance Relocation	No	Yes
Night Depository	No	Yes
Temporary Branch	No	Yes
ATM / iTM Closing	No	No
Emergency Acquisitions/FDIC Assistance	No	Yes
Loan Production Office	No	No
Remote Service Units (RSU)	No	No

Lease Loss

The loss of lease arrangement does not exempt a bank from branch closing notice requirements. To ensure compliance with 12 USC 1831r-1's 90-day notice provisions, lease agreements should incorporate adequate safeguards, such as a 120-day advance notice provision. In a sudden loss of lease event where 90-day notice is not possible, the bank must notify customers and the state and federal regulatory authorities in the manner specified by branch closing rules.

Branch Consolidation

For the purposes of branch closing rules, branch consolidations are considered relocations if they meet the short-distance relocation definition in 12 CFR 5.3(1). Though such consolidations do not require advance branch closing notices, the bank must submit a final branch closing notice when it consolidates branches within the same neighborhood.

Branch Downgrade to an ATM/iTM (Interactive Teller Machine)

A bank must comply with the 90-day advance notice and the final branch closing notice, when it downgrades a brick-and-mortar branch to an ATM/iTM or night depository. The branch authorization must remain in effect, if a separate night depository will remain open with the ATM/iTM.

Mobile Branch Operations

A mobile branch is subject to the branch closing notice requirements if:

**FNB OXFORD BANK
OXFORD, MISSISSIPPI**

POLICY AND PROCEDURE ON BRANCH CLOSINGS

- It will cease conducting branching transactions in the geographic area for which it was approved, or;
- The changes in services constitute a branch downgrade that is subject to branch closing requirements (for example, a staffed mobile branch is replaced by a mobile ATM/iTM).

If a mobile branch change stops within its approved geographic area, no branch closing notice is required.

Night Depository Closing

Under branch closing rules, a night depository is not considered a branch; therefore, no advance notice of the closing of a standalone night depository (including one that may be located at an ATM/iTM site) is required. However, a night depository is considered a branch under 12 CFR 5.3(I), and a final branch closing notice is required when a bank closes a standalone night depository.

Customer Allocation

Under 12 USC 1831r-1, an insured depository institution that proposes to close a branch must provide notice of the proposed closing to the state and federal regulators and to the customers of the branch. A bank is expected to develop a reasonable method of allocating customers to specific branches, such as a location where a deposit or loan account was opened or through use. However, it is recognized that a reasonable method of allocation may result in certain facilities, which technically constitute branches, not being assigned customers. In such cases, a notice that the branch will close and a posting of the notice on the branch premises will suffice. Mobile branches also are subject to customer allocation rules. For example, if customers are assigned to the mobile unit, normal customer notification requirements apply. If no customers are assigned to the mobile unit, then posting a notice on the unit will suffice.

Adopted by the Board of Directors, May 20, 2008 replacing previous policy/jes

Reviewed April, 2009 js, no changes recommended

Reviewed March, 2010, J Shaw, no change

Reviewed June, 2011 J Shaw, no change

Reviewed 6/8/12 by GCD – no changes

Reviewed August, 2013 by J Shaw- with changes

Reviewed 10/10/14 by Donna Bridges – name change

Reviewed 02/09/2016 by D Bridges – with changes

Reviewed 11/10/2016 by D Bridges – no changes

Reviewed 02/28/18 by DHB – no changes

Reviewed 01/10/19 by DJB - with changes

Reviewed 02/24/19 by DJB – no changes

Reviewed 02/12/21 by DJB – no changes

Approved by BOD 6/16/09

Approved by BOD 6/15/10

Approved by BOD 7/19/11

Approved by BOD 10/16/12

Approved by BOD 9/17/13

Approved by BOD 10/21/14

Approved by BOD 3/15/16

Approved by BOD 1/17/17

Approved by BOD 3/20/18

Approved by BOD 4/16/19

Approved by BOD 3/17/20

Approved by BOD 3/16/21

**FNB OXFORD BANK
OXFORD, MISSISSIPPI**

POLICY AND PROCEDURE ON BRANCH CLOSINGS

Reviewed 04/25/21 by DJB – with changes
Reviewed by DJB 8/1/2023 – no changes

Approved by BOD 5/17/22
Approved by BOD 8/14/23