Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

July 27, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of South Padre Island
Charter Number: 18063
709 Padre Blvd.
South Padre Island, TX 78597

Office of the Comptroller of the Currency
10001 Reunion Place, Suite 250
San Antonio, TX 78216

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

Contents

Overall CRA Rating 1
Description of Institution 1
Scope of the Evaluation 3
Discriminatory or Other Illegal Credit Practices Review 3
State Rating 5
State of Texas 5
Appendix A: Scope of Examination A-1
Appendix B: Summary of MMSA and State Ratings B-1
Appendix C: Definitions and Common Abbreviations C-1
Appendix D: Tables of Performance Data D-1

Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test is based on a reasonable loan-to-deposit (LTD) ratio, a majority of loans being originated inside the assessment area (AA) and a reasonable distribution of loans to borrowers of different income levels and businesses of different sizes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was reasonable.

First National Bank of South Padre Island's (FNBSPI) quarterly average LTD ratio calculated on a bank-wide basis for the 16-quarter evaluation period is 40.94 percent. The LTD ratio ranged from a low of 30.37 percent on March 31, 2022, to a high of 57.60 percent on December 31, 2025.

To assess the bank's performance, we compared its average quarterly LTD ratio to three similarly situated institutions. The average LTD ratio of the other institutions is 53.25 ranging from an average low of 36.02 percent to an average high of 65.14 percent

Lending in Assessment Area

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

The bank originated and purchased 58.62 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area **2023 - 2025**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	15	75.00	5	25.00	20	6,718	85.73	1,118	14.27	7,836
Small Business	19	50.00	19	50.00	38	9,127	60.82	5,879	39.18	15,006
Total	34	58.62	24	41.38	58	15,845	69.37	6,997	30.63	22,842

Source: 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

FNBSPI is a $78 million intrastate community bank headquartered in South Padre Island, TX. The bank is wholly owned by Laguna Madre Delaware Bancshares, Incorporated. The bank does not maintain any

foreign deposits or loans and has no affiliates. The bank does not engage in any subsidiary activities that impact its capacity for community reinvestment. In addition to the main location on South Padre Island, FNBSPI has a branch in neighboring Port Isabel. Both locations provide full banking services and automated teller machines. No new branches or ATMs have been opened or closed since the last CRA exam. In addition, no new products have been introduced during the evaluation period.

The bank's primary lending products include home mortgages and commercial loans. As of December 31, 2025, Residential real estate loans totaled $21.5 million representing 54.7 percent of the portfolio while commercial credits totaled $15.5 million or 39.6 percent of the portfolio. The bank's primary areas of operation are the cities of South Padre Island and Port Isabel. The large number of homes and condos within those communities are used as primary residences, second homes, and investment/rental properties. FNBSPI reported total assets of $77.8 million with $67.0 million in total deposits. Net loans totaled $38.6 million representing 49.6 percent of total assets and 57.6 percent of total deposits. Tier one capital totaled $10.6 million with a leverage ratio of 13.2 percent.

Based on the bank's financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit FNBSPI's ability to help meet credit needs within its AA. The prior CRA performance evaluation dated May 02, 2022, assigned an overall "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBSPI's CRA performance activities using the Small Bank examination procedures. The bank's primary lending products include home mortgage loans and commercial loans. The evaluation period covered loans originated between January 01, 2023, to December 31, 2025. To evaluate lending performance, we selected a random sample of home mortgage loans and small loans to businesses. For home mortgage activity, we compared the bank's performance to 2024 census data and 2023 and 2024 HMDA aggregate Data. For loans to small businesses, the OCC compared the bank's performance with 2024 census data, 2025 Dunn & Bradstreet (D&B) and 2023 and 2024 CRA Aggregate Data.

Selection of Areas for Full-Scope Review

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

FNB has one designated AA located in the Brownsville/Harlingen MSA consisting of two census tracts (CTs) within Cameron County. The AA includes the two cities of South Padre Island and Port Isabel where the bank operates two branches and two ATMs. Both CTs are contiguous but are separated by the Laguna Madre water way.

Ratings

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

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Texas

CRA rating for the State of Texas: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable distribution of loans to borrowers of different income levels and businesses of different sizes within the AA.
- There were no CRA-related complaints received during the evaluation period.

Description of Institution's Operations in Texas

FNBSPI is a full service, intrastate community bank headquartered in South Padre Island, Texas. The bank operates two branches, one located in Port Isabel, Texas and the other on South Padre Island. Both locations provide basic banking services, including automated teller machines (ATMs). The bank offers traditional loan and deposit services as well as online banking services which allow customers to view account activity, transfer funds, pay bills, send and receive messages, and download account information. Additionally, depositors can access funds 24 hours a day via two drive-up ATMs, located at both branches.

FNB South Padre Island AA

The AA contains two CTs: one middle- and one upper-income in Cameron County, Texas. There are no low or moderate income CTs within the bank's AA. The AA is part of the Brownsville-Harlingen MSA. The bank's AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies. The defined AA is based on the location of the two branches, two ATMs, and the bank's operating and lending capabilities.

The largest industries within the AA are education/healthcare and leisure and hospitality services. Education/healthcare make up 30 percent, leisure and hospitality make up 10.8 percent. The unemployment rate as of December 31, 2025 is 6.6 percent, which is higher than the state at 3.9 percent and 20 percent of households fall below the poverty level. Based on the May 2025 US Bureau of Labor Statistics, the average hourly wage of workers in the Brownsville-Harlingen MSA is $22.65/hour and below the national average of $33.54.

The bank's focus on home mortgage products in South Padre Island is due to the large number of homes and condos that customers and residents use as primary residence, second homes, and investment/rental properties. The December 31, 2025, FDIC Market Share Report indicated 18 financial institutions operate in Cameron County with deposits totaling $6.3 billion. FNBSPI ranks 13th and accounts for 1.15 percent of the market share. FNBSPI faces strong competition in the AA including large, regional, and community banks.

Based on information in the below table, the median family income for the AA is $66,500. The median housing value in the AA is $317,725 and $307,500 in 2023 and 2025 respectively, reflecting a percent change of -3.2 percent from 2023 to 2025 according to Realtor.com data. Low-income families within the AA earned less than $33,250 and moderate-income families earned at least $33,251 and less than $53,200. One method to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This equates to a maximum monthly mortgage payment of $831 for low-income borrowers and $1,330 for moderate-income borrowers. Assuming a 30-year mortgage with a 6 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median housing value would be $1,844. Low- and moderate-income families would be challenged to afford a mortgage loan in this AA.

To help identify needs and opportunities within the AA, we interviewed a community contact with a local economic development organization and found the primary needs within the community are lending opportunities for small businesses and low to moderate income households, affordable housing, and financial literacy. Efforts by community leaders and the cities to address affordable housing have been marginal.

Assessment Area(s) – FNB South Padre Island AA						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.00	0.00	50.00	50.00	0.00
Population by Geography	6,904	0.00	0.00	56.47	43.53	0.00
Housing Units by Geography	11,454	0.00	0.00	22.77	77.23	0.00
Owner-Occupied Housing by Geography	2,289	0.00	0.00	46.83	53.17	0.00
Occupied Rental Units by Geography	1,128	0.00	0.00	60.02	39.98	0.00
Vacant Units by Geography	8,037	0.00	0.00	10.69	89.31	0.00
Businesses by Geography	601	0.00	0.00	31.78	68.22	0.00
Farms by Geography	10	0.00	0.00	50.00	50.00	0.00
Family Distribution by Income Level	2,136	20.32	10.86	15.64	53.18	0.00
Household Distribution by Income Level	3,417	23.59	12.20	15.16	49.05	0.00
Unemployment rate (%)	1.27	0.00	0.00	0.17	2.47	0.00
Households Below Poverty Level (%)	19.96	0.00	0.00	29.45	10.01	0.00
Median Family Income (15180 - Brownsville-Harlingen, TX MSA)		$47,332	Median Housing Value			$251,350
Median Family Income (15180 - Brownsville-Harlingen, TX MSA) for 2025		$66,500	Median Gross Rent			$874
			Families Below Poverty Level			17.70

FFIEC File - 2024 Census
2025 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Scope of Evaluation in Texas

A full-scope review was completed for the bank's singular AA. We reviewed loans to small businesses and home mortgage loans. Higher weight for state conclusions was placed on small business lending given the need identified by the community contact and these loans representing a larger portion of origination by volume for the bank. Additionally, the geographic distribution of loans were not evaluated as the AA contains no low- or moderate-income CTs and analysis of geographic performance would not provide meaningful conclusions.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the FNB South Padre Island AA was reasonable.

Distribution of Loans by Income Level of the Geography

The cities of South Padre Island and Port Isabel are comprised of one middle-income and one upper-income CT, with no low- or moderate-income tracts present; therefore, analyzing the bank's geographic distribution of loans would not yield meaningful analysis.

Lending Gap Analysis

Our review of the geographic distribution of loans did not identify any conspicuous, unexplained gaps in the bank's lending patterns in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans by income level of the borrower is adequate. The bank originated zero home mortgage loans to low-income borrowers. The percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but exceeded aggregate lending to these families by all HMDA reporting lenders in the AA.

We found the distribution to be adequate given the high real estate values and limited availability of affordable housing in the AA. South Padre Island and Port Isabel are both destination resort vacation towns with investors and developers purchasing properties for investment income purposes and others purchasing properties as vacation or second homes. As noted in the AA description above, low- and moderate-income families would be challenged to afford a mortgage loan in this AA due to affordability.

Small Loans to Businesses

Refer to Table 10 in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with annual revenues of $1 million or less was near to the percentage of small businesses in the AA and exceeded the percentage of aggregate lending to these businesses reported by business lenders in the AA.

Responses to Complaints

FNBSPI did not receive any complaints related to its CRA or fair lending performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/23 to 12/31/25)	
Bank Products Reviewed:	Home mortgage and small business loans	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Texas		
FNB South Padre Island AA	Full-scope	Port Isabel, TX – 1 CT South Padre Island, TX – 1 CT

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
First National Bank of South Padre Island	Satisfactory
MMSA or State:	
TEXAS	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table 8. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

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

Table 10. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: (1) the percentage distribution of businesses with revenues of greater than $1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. **Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-,

middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to: (1) the percentage distribution of farms with revenues of greater than $1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
FNB South Padre Island AA	20	8,653	100.00	587	--	--	--	--	--	--	46.83	--	15.50	53.17	100.00	84.50	--	--	--
Total	**20**	**8,653**	**100.00**	**587**	**--**	**--**	**--**	**--**	**--**	**--**	**46.83**	**--**	**15.50**	**53.17**	**100.00**	**84.50**	**--**	**--**	**--**

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
FNB South Padre Island AA	20	8,653	100.00	587	20.32	0.00	2.39	10.86	5.00	0.68	15.64	5.00	3.75	53.18	90.00	63.88	--	0.00	29.30
Total	**20**	**8,653**	**100.00**	**587**	**20.32**	**0.00**	**2.39**	**10.86**	**5.00**	**0.68**	**15.64**	**5.00**	**3.75**	**53.18**	**90.00**	**63.88**	**--**	**0.00**	**29.30**

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
FNB South Padre Island AA	19	9,127	100.00	800	--	--	--	--	--	--	31.78	21.05	25.00	68.22	78.95	75.00	--	--	--
Total	**19**	**9,127**	**100.00**	**800**	**--**	**--**	**--**	**--**	**--**	**--**	**31.78**	**21.05**	**25.00**	**68.22**	**78.95**	**75.00**	**--**	**--**	**--**

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023 - 2025
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
FNB South Padre Island AA	19	9,127	100.00	800	86.36	73.68	50.38	3.33	21.05	10.32	5.26
Total	**19**	**9,127**	**100.00**	**800**	**86.36**	**73.68**	**50.38**	**3.33**	**21.05**	**10.32**	**5.26**

Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2025 Dunn & Bradstreet SBSF Demographics, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%