

PUBLIC DISCLOSURE

November 24, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank OZK
Certificate Number: 110

18000 Cantrell Road
Little Rock, Arkansas 72223

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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

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INSTITUTION RATING

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

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

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

The Lending Test is rated Low Satisfactory.

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

The Investment Test is rated Outstanding.

- The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits excellent responsiveness to credit and CD needs.

- The institution makes significant use of innovative and/or complex investments to support CD initiatives.

The Service Test is rated Low Satisfactory.

- Delivery systems are reasonably accessible to essentially all portions of the institution's AAs.
- To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.
- Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals.
- The institution provides a relatively high level of CD services.

DESCRIPTION OF INSTITUTION

Bank OZK operates as a state-chartered retail commercial bank headquartered in Little Rock, Arkansas. In 2017, Bank OZK merged its holding company into the bank and individual shareholders control the bank through common shares outstanding. Bank OZK owns numerous non-lending subsidiaries. This evaluation does not include a review of any affiliate or subsidiary activities. The bank received a "Satisfactory" rating at its previous Federal Deposit Insurance Corporation (FDIC) Community Reinvestment Act (CRA) Performance Evaluation dated July 11, 2022, using Federal Financial Institutions Examination Council Large Bank Procedures.

As of this evaluation's date, Bank OZK operates 240 full-service offices and 253 ATMs in the AAs located through Arkansas, Florida, Georgia, North Carolina, Tennessee, Texas, and the Texarkana Multi-State (MS) Metropolitan Statistical Area (MSA). The bank opened 19 full-service branches and closed 7 full-service branches since the prior evaluation. Refer to the individual rated areas and AAs' sections for details. Bank OZK did not experience any merger or acquisition activity since the prior evaluation.

The bank continues to maintain a business focus on home mortgage and commercial lending but also offers a full line of other standard loan products including construction, agricultural, and consumer loans. Deposit products offered include checking, savings, and money market accounts, as well as debit cards. Bank OZK also offers other financial services such as trust services, brokerage services, and credit cards. Alternative delivery systems include online and mobile banking, mobile deposit, and mobile bill payment options. The bank offers hours and days of service consistent with area and industry norms.

As of the June 30, 2025, Reports of Condition and Income, Bank OZK reported total assets of approximately \$41.5 billion, total loans of \$33.0 billion, and total deposits of \$33.5 billion. Since the prior evaluation, total assets grew by 56.1 percent, total loans grew by 74.3 percent, and total deposits grew by 64.9 percent. As presented in the following table, the mix of outstanding loans as of June 30, 2025, shows that commercial, construction and land development, and residential lending represent the largest loan categories.

Loan Portfolio Distribution as of 06/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	8,684,947	26.3
Secured by Farmland	305,921	0.9
Secured by 1-4 Family Residential Properties	1,528,174	4.6
Secured by Multifamily (5 or more) Residential Properties	4,336,103	13.1
Secured by Nonfarm Nonresidential Properties	8,599,886	26.1
Total Real Estate Loans	23,455,031	71.0
Commercial and Industrial Loans	2,330,142	7.1
Agricultural Production and Other Loans to Farmers	1,977	<0.1
Consumer Loans	4,021,953	12.2
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	3,195,951	9.7
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	33,005,054	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet its AAs' credit needs.

DESCRIPTION OF ASSESSMENT AREAS

As reflected in the table below and more fully described under the Description of Institution's Operations section of each rated area, Bank OZK operates in six states, the States of Arkansas, Florida, Georgia, North Carolina, Tennessee, and Texas. This includes one MS MSA, the Texarkana, TX-AR MSA. The bank currently has 6 AAs in Arkansas, 9 in Florida, 11 in Georgia, 7 in North Carolina, 1 in Tennessee, and 4 in Texas. Please refer to the rated areas and individual AAs' sections for additional information.

The State of Tennessee rated area reflects a new rated area since the previous evaluation. As more fully described under the Scope of Evaluation, examiners did not assess the bank's lending performance in the new area or provide separate conclusions and ratings given the timing of the July 8, 2024, branch opening and considering the calendar years reviewed and available aggregate data. Additionally, the States of Arkansas, Florida, and North Carolina reflect rated areas that contain new AAs since the previous evaluation. Examiners did not assess the bank's lending performance in the new areas or provide separate conclusions due to the timing of the related branch openings. Please refer to the rated areas' sections for additional information.

Description of Rated Areas Institution			
Rated Area	Counties in Rated Area	# of CTs	# of Branches
State of Arkansas*	Baxter, Benton, Boone, Clark, Craighead, Crawford, Faulkner, Franklin, Garland, Hempstead, Hot Spring, Johnson, Logan, Lonoke, Marion, Newton, Pope, Pulaski, Saline, Searcy, Sebastian, Van Buren, Washington	481	75
State of Florida*	Broward, Charlotte, Duval, Hillsborough, Lee, Manatee, Marion, Miami-Dade, Palm Beach, Pasco, Pinellas, Sarasota	3,037	42
State of Georgia	Barrow, Bartow, Bibb, Carroll, Chatham, Cherokee, Clarke, Cobb, Coweta, Dawson, Decatur, DeKalb, Douglas, Fannin, Floyd, Forsyth, Fulton, Gilmer, Glynn, Gordon, Grady, Gwinnett, Habersham, Hall, Haralson, Heard, Henry, Jackson, Lowndes, Lumpkin, Murray, Muscogee, Oconee, Paulding, Pickens, Rockdale, Union, Walton, Whitfield	1,826	68
Texarkana MS MSA	Bowie, Miller	40	2
State of North Carolina*	Alamance, Buncombe, Cabarrus, Cleveland, Davidson, Davie, Forsyth, Gaston, Lincoln, Mecklenburg, New Hanover, Randolph, Rowan, Rutherford	870	25
State of Tennessee**	Davidson	174	1
State of Texas	Bexar, Caldwell, Collin, Dallas, Denton, Galveston, Harris, Tarrant, Travis, Williamson	3,536	27
<i>Source: Bank Data; 2020 U.S. Census Data</i> <i>*Denotes a rated area with an AA(s) not evaluated</i> <i>**Denotes a rated area not evaluated</i>			

SCOPE OF EVALUATION

General Information

The evaluation covers the period from the previous evaluation, dated July 11, 2022, to the current evaluation, dated November 24, 2025. To assess performance, examiners applied Large Bank Procedures, which include the Lending, Investment, and Service Tests. The appendices list each test's criteria.

The following table shows that the States of Arkansas, Florida, and Georgia accounted for a majority of the bank's loans, deposits, and branches. Consequently, examiners weighed records in these states heaviest when arriving at applicable conclusions and ratings. Refer to each rated area's section for details on AAs reviewed using full-scope and limited-scope procedures.

Rated Area Breakdown of Loans, Deposits, and Branches						
Rated Area	Institution					
	Loans*		Deposits		Branches*	
	\$(000s)	%	\$(000s)	%	#	%
Texarkana MS MSA	12,002	0.8	184,683	0.6	2	0.9
State of Arkansas	384,306	25.1	12,398,248	37.6	74	31.5
State of Florida	270,455	17.7	5,507,749	16.7	41	17.4
State of Georgia	501,723	32.8	9,135,507	27.7	68	28.9
State of North Carolina	198,068	12.9	2,178,677	6.6	23	9.8
State of Texas	163,559	10.7	3,594,911	10.9	27	11.5
Total	1,530,113	100.0	32,999,775	100.0	235	100.0

Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.
*Excludes new AA(s) not evaluated

Activities Reviewed

For the Lending Test, Large Bank Procedures require examiners to consider a bank’s reported home mortgage, small business, and small farm loans, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers the following total loans reported according to the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 1,193 loans totaling \$377,095,000
- 2023: 857 loans totaling \$321,459,000
- 2024: 2,393 loans totaling \$657,188,000

Small Business Loans

- 2022: 857 loans totaling \$212,659,000
- 2023: 695 loans totaling \$166,901,000
- 2024: 1,011 loans totaling \$221,675,000

Small Farm Loans

- 2022: 62 loans totaling \$6,125,000
- 2023: 42 loans totaling \$5,619,000
- 2024: 43 loans totaling \$5,380,000

CD Loans

- July 11, 2022 – November 24, 2025: 190 loans totaling \$1,765,542,000

Small farm loans account for only 0.9 percent of the total dollar volume and 2.1 percent of the total number of reportable home mortgage, small business, and small farm loans. Examiners further determined that small farm loans do not represent a major product line for the institution as a whole or for any individual AA. Therefore, examiners did not analyze small farm loans since conclusions regarding them would not materially affect any conclusions or ratings.

Since no trends exist between the different years' data that materially affect applicable conclusions or ratings, this evaluation only presents 2024 home mortgage loan data and 2023 small business loan data, which reflects the most recent years for which corresponding aggregate data exists as of this evaluation date. However, examiners presented all years reviewed in the AA concentration discussion. Examiners primarily compared the bank's 2022, 2023, and 2024 home mortgage and 2022 and 2023 small business lending performance to corresponding aggregate data. Examiners compared the bank's 2024 small business lending performance to 2024 D&B data.

Examiners considered the universe of loans reviewed by number and dollar volume as well as management's stated business strategy to determine the weighting applied to the loan categories reviewed. As suggested by the above figures, examiners generally weighed home mortgage loans heavier than small business loans when arriving at applicable conclusions as home mortgage loans represented a higher proportion of the bank's lending activity by number and dollar volume. However, small business lending is more prominent in the Texarkana MS MSA rated area and received greater weight in that area.

The scopes for the Investment and Service Tests considered applicable current period CD activities, including qualified investments (QIs) and CD services. The Investment Test's scope further encompassed all prior period QIs. Prior period QIs involve those purchased prior to the previous evaluation but remain outstanding as of this evaluation's date. Examiners used the book value as of the current evaluation date for all prior period QIs.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings or closings during the evaluation period. The review further evaluated retail banking products and services targeted toward LMI individuals or small businesses and/or tailored to meet specific needs within the AAs. Examiners included the CD activities that occurred in the new rated area and AAs at the institution level or captured such activities in the Statewide/Regional figures within applicable tables.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Bank OZK demonstrated a low satisfactory record for the bank as a whole regarding the Lending Test. The adequate records regarding geographic distribution and borrower profile combined with the little use of innovative and/or flexible lending outweighs the bank being a leader in making CD loans, a high percentage of loans made in the AA, and excellent lending levels to support this conclusion. The Texarkana MS MSA, State of Arkansas, and State of Florida demonstrated consistent performance. The State of Georgia, State of North Carolina, and State of Texas demonstrated inconsistent performance, which is above the level noted for the institution.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. An excellent record regarding home mortgage lending outweighs a good record regarding small business lending to support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the AA credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs. For 2024, the bank originated 2,133 reportable home mortgage loans totaling approximately \$566.2 million in its AAs. Bank OZK captured 0.2 percent market share of the total number of home mortgage loans and 0.2 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 82nd out of 2,192 total lenders in the bank's AAs. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 5.0 percent of lenders reporting such loans in the AAs, at 3.7 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs. For 2023, the bank originated 615 reportable small business loans totaling approximately \$144.7 million inside its AAs. Bank OZK captured 0.04 percent market share of the total number of small business loans and 0.4 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 68th out of 478 total lenders in the bank's AAs. This ranking, which considers the total number and dollar amount of loans made by each institution, lands the bank in the top 15.0 percent of lenders reporting such loans in the AAs, at 14.2 percent.

Assessment Area Concentration

A high percentage of loans are made in the institution's AAs. Examiners considered the bank's asset size and office structure as well as the loan categories reviewed relative to the areas' combined size and economy when arriving at this conclusion.

The following table shows the institution originated a high percentage of its home mortgage loans by number and small business loans by number and dollar volume within its AAs. The institution originated an adequate percentage of its home mortgage loans by dollar volume inside its AAs. However, considering both the number and dollar volume of the loan products reviewed, examiners concluded that the institution originated an overall high percentage of its loans inside its AAs.

Lending Inside and Outside of the Assessment Areas Institution										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	1,016	85.2	177	14.8	1,193	282,659	75.0	94,436	25.0	377,095
2023	750	87.5	107	12.5	857	156,714	48.8	164,745	51.2	321,459
2024	2,133	89.1	260	10.9	2,393	566,239	86.2	90,949	13.8	657,188
Subtotal	3,899	87.8	544	12.2	4,443	1,005,612	74.2	350,130	25.8	1,355,742
Small Business										
2022	756	88.2	101	11.8	857	178,865	84.1	33,794	15.9	212,659
2023	615	88.5	80	11.5	695	144,747	86.7	22,154	13.3	166,901
2024	883	87.3	128	12.7	1,011	188,751	85.1	32,924	14.9	221,675
Subtotal	2,254	87.9	309	12.1	2,563	512,363	85.2	88,872	14.8	601,235
Total	6,153	87.8	853	12.2	7,006	1,517,975	77.6	439,002	22.4	1,956,977
<i>Source: 2022-2024 HMDA and CRA Reported Data Due to rounding, totals may not equal 100.0.</i>										

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs. Performance in the Texarkana MS MSA, State of Arkansas, State of Florida, and State of Georgia demonstrated consistent performance, while the State of North Carolina and State of Texas demonstrated inconsistent performance that rises above the institution’s overall record. Examiners focused on the percentage by number of loans in LMI census tracts when arriving at conclusions for this performance factor. Refer to the rated areas and AAs’ sections for details.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among customers of different income levels and business customers of different sizes. Performance in the State of Arkansas, State of Florida, State of Georgia, State of North Carolina, and State of Texas demonstrated consistent performance, while the Texarkana MS MSA demonstrated inconsistent performance that falls below the institution’s overall record. Examiners focused on the percentage by number of loans to LMI individuals and businesses with gross annual revenues of \$1 million or less when arriving at conclusions for this performance factor. Refer to the rated areas and AAs’ sections for details.

Innovative or Flexible Lending Practices

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Examiners analyzed performance for this criterion at the institution level only, as the bank generally offers all of its innovative or flexible lending programs throughout all of its AAs. The following table shows the loan activity attributed to the bank’s innovative or flexible programs.

Since the prior evaluation, the bank originated 377 innovative or flexible loans totaling approximately \$89.9 million. This dollar figure equates to 0.3 percent of average total assets of \$34.2 billion and 0.3 percent of average net loans of \$26.1 billion since the previous evaluation. The table below displays the bank’s innovative or flexible loans by program and year.

Innovative or Flexible Lending Programs										
Institution										
Type of Program	2022		2023		2024		YTD 2025		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
FHA	0	0	0	0	12	2,994	55	14,110	67	17,104
USDA RHS	0	0	0	0	1	150	7	1,310	8	1,460
USDA Farm Service Agency	1	850	4	4,585	3	4,995	1	1,615	9	12,045
VA	0	0	0	0	5	1,118	16	3,748	21	4,866
Freedom Advantage Mortgage	21	4,042	68	11,620	36	7,399	42	6,309	167	29,370
ITIN	0	0	0	0	2	540	20	4,914	22	5,454
SBA 7(a)	10	3,314	16	3,595	28	5,321	29	7,405	83	19,635
Total	32	8,206	88	19,800	87	22,517	170	39,411	377	89,934
<i>Source: Bank Data</i>										

Federal Housing Administration (FHA)

This federal program allows lower income individuals to borrow money for the purchase of a home they would not otherwise be able to afford. The program primarily serves those who cannot afford a down payment or do not qualify for private mortgage insurance. It allows first-time homebuyers to put down as little as 3.5 percent, receive seller contributions, and most closing costs can be included in the loans.

U.S. Department of Agriculture (USDA) Rural Housing Service (RHS)

This program offers low-interest rate loans to individuals in rural communities with populations of 20,000 or less. The program does not require a down payment and eliminates the requirement of mortgage insurance. It offers flexible credit standards, 30-year fixed rate terms, and is limited to LMI households.

USDA Farm Service Agency

Loans under the USDA Farm Service Agency Guaranteed Loan Program provide government-backed guarantees that allow the bank to offer more flexible underwriting and longer repayment terms, supporting the preservation of jobs and agricultural operations in rural and underserved areas.

Veterans Administration (VA)

This federal program offers long-term financing to eligible veterans and surviving spouses. It helps veterans purchase homes with no down payment, provides 100.0 percent financing without private mortgage insurance, and allows veterans to receive up to 6.0 percent toward closing costs.

Freedom Advantage Mortgage

Bank OZK offers an in-house flexible loan program tailored to LMI individuals and for properties located in LMI census tracts. The program offers flexible lending terms, such as lower down payments and flexible underwriting terms.

Individual Taxpayer Identification Number (ITIN)

ITIN mortgage loans are designed to help meet the identified residential mortgage credit needs of non-U.S. citizens who can provide either a Social Security Number or ITIN but cannot provide an Employment Authorization Document or other documentation showing that the borrower's immigration status is current, such as a Permanent Resident Card or work visa. The program is to make first-lien, fixed-rate, fully amortizing home mortgage loans to borrowers who meet the bank's underwriting standards and will occupy the property being financed as a primary residence.

Small Business Administration (SBA) 7(a)

This flexible federal program provides financial assistance to small businesses. It offers loans up to \$5.0 million for working capital, equipment, debt refinancing, or real estate. These government-backed loans feature lower down payments and longer terms compared to conventional financing.

Community Development Loans

The institution is a leader in making CD loans. Performance in the State of Florida, State of Georgia, State of North Carolina, and State of Texas proved consistent, while performance in the Texarkana MS MSA and State of Arkansas proved inconsistent and fall below the institution level.

During the evaluation period, Bank OZK originated 190 CD loans totaling approximately \$1.8 billion. This level of activity represents 5.2 percent of average total assets and 6.8 percent of average net loans since the previous evaluation. This activity reflects a decrease in the number and increase in the dollar volume from the previous evaluation when the bank originated 396 CD loans totaling approximately \$1.3 billion, which represented 6.6 percent of average total assets and 8.6 percent of average net loans. The following tables show the bank's CD lending by rated area, purpose, and year.

Community Development Lending by Rated Area										
Institution										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Texarkana MS MSA	2	2,938	0	0	0	0	0	0	2	2,938
State of Arkansas	20	49,608	3	3,750	13	31,890	1	100	37	85,348
State of Florida	11	89,010	5	6,851	11	38,603	3	422,141	30	556,605
State of Georgia	23	264,812	7	1,950	18	155,242	10	243,868	58	665,872
State of North Carolina	15	106,139	7	9,898	5	38,850	1	279	28	155,166
State of Texas	22	274,419	1	1,060	7	13,076	5	11,058	35	299,613
Total	93	786,926	23	23,509	54	277,661	20	677,446	190	1,765,542

Source: Bank Data

Community Development Lending Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	17	99,695	1	500	11	94,791	1	279	30	195,265
2023	29	185,826	10	8,094	22	124,041	10	447,475	71	765,436
2024	33	295,164	8	7,127	12	40,829	8	221,940	61	565,060
YTD 2025	14	206,241	4	7,788	9	18,000	1	7,752	28	239,781
Total	93	786,926	23	23,509	54	277,661	20	677,446	190	1,765,542
<i>Source: Bank Data</i>										

In addition to reflecting a leadership level of lending, the CD loans reflect good responsiveness to the AAs' CD needs. Although the bank's CD loans primarily benefited affordable housing and revitalization or stabilization efforts, they also demonstrated responsiveness to identified needs in areas of community service and economic development. Refer to the rated areas and AAs' sections for details.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the bank as a whole regarding the Investment Test. The significant use of innovative and/or complex QIs lifted by an excellent level of QIs and excellent responsiveness to CD needs supports this conclusion. Performance in the State of Florida, State of North Carolina, and State of Texas proved consistent, while performance in the Texarkana MS MSA, State of Arkansas, and State of Georgia proved inconsistent and fall below the institution level.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The bank made use of 796 QIs totaling approximately \$951.8 million. This represents 2.8 percent of average total assets and 30.3 percent of average total securities of \$3.1 billion since the previous evaluation. This reflects an increase from the 1.7 percent of average total assets and 13.1 percent of average total securities recorded at the previous evaluation. The following tables summarize the bank's QIs by rated area, purpose, and year.

Qualified Investments by Rated Area Institution										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Texarkana MS MSA	4	4,316	7	26	0	0	0	0	11	4,342
State of Arkansas	47	129,872	131	26,858	21	2,688	11	60	210	159,478
State of Florida	61	163,083	53	13,303	21	6,382	5	20	140	182,788
State of Georgia	71	161,269	87	2,128	24	1,606	3	15	185	165,018
State of North Carolina	42	74,396	20	68	17	6,056	4	15	83	80,535
State of Texas	76	192,157	30	10,231	29	29,659	0	0	135	232,047
Regional Activities	3	1,562	2	10	11	47,330	1	260	17	49,162
Nationwide Activities	2	8,747	0	0	12	60,993	1	8,712	15	78,452
Total	306	735,402	330	52,624	135	154,714	25	9,082	796	951,822

Source: Bank Data

Qualified Investments Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	103	197,005	19	24,923	13	21,407	1	260	136	243,595
2022	20	148,320	1	4,516	8	42,000	0	0	29	194,836
2023	23	132,483	0	0	13	48,971	1	8,712	37	190,166
2024	13	129,230	0	0	4	37,542	0	0	17	166,772
YTD 2025	14	127,327	1	250	2	3,967	0	0	17	131,544
Subtotal	173	734,365	21	29,689	40	153,887	2	8,972	236	926,913
Qualified Grants & Donations	133	1,037	309	22,936	95	826	23	110	560	24,909
Total	306	735,402	330	52,625	135	154,713	25	9,082	796	951,822

Source: Bank Data

The following are notable examples of the bank's regional or nationwide QI activities:

- **Economic Development** – The bank invested over \$58.0 million in Small Business Investment Companies with the purpose, mandate, or function of the funds supporting small businesses, creating jobs for LMI individuals, and building an environment for entrepreneurs to prosper. These investments benefit a broader national area.
- **Affordable Housing** – The bank invested \$5.3 million in a Low-Income Housing Tax Credit (LIHTC) multi-fund that provides housing for LMI individuals/families. This fund provides working capital for properties across the nation.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs. As reflected in the above tables, a majority of the QIs funded affordable housing which is an identified and significant CD need in all rated areas. In addition, the institution did not ignore any CD categories, as there was activity in the remaining three categories.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives. Bank OZK has approximately \$590.7 million in new and prior period complex investments that are still maintained in the investment portfolio. The bank's investments primarily addressed affordable housing needs at approximately \$555.8 million and to a lesser extent economic development, community service, and revitalization and stabilization efforts within the bank's rated areas.

The bank's primary sources of complex investments include LIHTCs and mortgage-backed securities (MBS). Investments in LIHTCs accounted for approximately \$544.4 million and MBSs for approximately \$16.3 million. The LIHTC program incentivizes CD by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to low-income households. LIHTC projects are more complex requiring more expertise and/or staffing to execute and a significant amount of time to coordinate the financing process. The tax credits allow the developer to borrow less money for a project, thus reducing overhead by the sale of the LIHTCs to an investor to create equity in the project. The investor then receives the benefit of the tax credits. Investments in LIHTC programs are not routinely purchased by community banks.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record for the bank as a whole regarding the Service Test. The reasonably accessible delivery systems, opening and closing of branches that have generally not adversely affected the accessibility of its delivery systems, and services that do not vary in a way that inconveniences portions of the AAs outweigh a relatively high level of CD services to support this conclusion. The Texarkana MS MSA, State of Arkansas, State of Florida, State of North Carolina, and State of Texas demonstrated consistent performance. The State of Georgia demonstrated inconsistent performance, which is above the level noted for the institution.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution's AAs. The bank's reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the AAs. The following table shows Bank OZK’s distribution of branches in low-income census tracts falls 4.3 percentage points below the population percentage, reflecting reasonable accessibility. In moderate-income census tracts, Bank OZK’s branch distribution rises slightly above the population residing in those census tracts by 2.1 percentage points, also reflecting reasonable accessibility. Refer to the rated areas and AAs’ sections for details.

Branch and ATM Distribution by Geography Income Level												
Tract Income Level	Institution											
	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	779	7.8	2,816,676	6.8	6	2.5	6	2.4	0	0.0	0	0.0
Moderate	2,550	25.6	10,520,512	25.4	66	27.5	69	27.3	5	26.3	2	28.6
Middle	3,283	32.9	14,192,951	34.3	83	34.6	90	35.5	3	15.8	3	42.9
Upper	3,078	30.9	13,333,307	32.2	82	34.2	85	33.6	10	52.6	1	14.3
NA	274	2.7	543,552	1.3	3	1.3	3	1.2	1	5.3	1	14.3
Total	9,964	100.0	41,406,998	100.0	240	100.0	253	100.0	19	100.0	7	100.0
<i>Source: 2020 U.S. Census Data; Bank Data</i>												
<i>Due to rounding, totals may not equal 100.0.</i>												

Bank OZK’s alternative delivery systems are reasonably accessible to essentially all portions of the bank’s AAs. The preceding table shows that the bank’s level of ATMs in low-income census tracts falls 4.4 percentage points below the population level in low-income census tracts, thereby reflecting reasonable accessibility. The bank’s level of ATMs in moderate-income census tracts rises slightly above the population level in moderate-income census tracts by 1.9 percentage points, further reflecting reasonable accessibility.

Bank OZK also offers other alternative delivery systems for remote access to banking services at any location at any time. These systems include online banking, a mobile banking application, electronic statements, person-to-person funds transfers, payment by phone, and telephone banking. The alternative delivery systems offered remain consistent across all AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of the delivery systems, particularly in LMI geographies and/or to LMI individuals. As seen in the prior table, five branches opened in moderate-income census tracts, while two branches closed in moderate-income census tracts. No changes occurred in low-income census tracts. The remaining branch changes occurred in middle- and upper-income geographies and census tracts with no income designation.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals. The institution maintains hours and services typical for the areas served and the industry. Most locations maintain lobbies operating at least 8 hours Monday through Thursday with slightly extended hours on Friday, with some branches also operating Saturday morning lobby hours or drive-thru hours.

The bank offers a range of deposit products to consumer and commercial customers that includes checking, savings, money market, and certificate of deposit accounts. Credit-related products offered for consumer and commercial entities include non-residential loans, home mortgage loans, home equity loans and lines of credit, as well as various commercial purpose loan products.

Community Development Services

The institution provides a relatively high level of CD services. The following table shows that the bank provided 2,543 CD services since the previous evaluation. This level reflects an increase from the 940 CD services noted at the previous evaluation. The services primarily involved bank personnel’s use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations.

Service activities primarily demonstrate responsiveness to community services targeted at LMI individuals at 86.5 percent of the bank’s total CD services. However, the bank’s CD services reflect appropriate responsiveness to available opportunities by addressing several categories of CD needs in each rated area. The following tables display the CD services by rated area, purpose, and year. Refer to the rated areas and individual AAs’ sections for details.

Community Development Services by Rated Area					
Institution					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Texarkana MS MSA	3	18	0	0	21
State of Arkansas	14	494	43	34	585
State of Florida	28	599	28	6	661
State of Georgia	27	810	37	12	886
State of North Carolina	20	104	36	0	160
State of Texas	4	167	51	0	222
Regional Activities	0	8	0	0	8
Total	96	2,200	195	52	2,543
<i>Source: Bank Data</i>					

Community Development Services Institution					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	6	74	10	0	90
2023	27	397	36	21	481
2024	37	791	75	30	933
YTD 2025	26	938	74	1	1,039
Total	96	2,200	195	52	2,543
<i>Source: Bank Data</i>					

The following lists a notable example of a CD service occurring at the regional level.

- **Community Services** – A bank employee participated in mock interviews designed to assist LMI individuals who are interested in entering the banking industry. The non-profit organization primarily serves LMI individuals and provides programs to help lift individuals out of poverty.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

TEXARKANA MS MSA

CRA RATING FOR TEXARKANA MS MSA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN TEXARKANA MS MSA

Bank OZK designated one assessment area, the Texarkana MS MSA AA, in the Texarkana MS MSA. The AA includes all 40 census tracts that make up Bowie and Miller Counties, two of the three counties that make up the Texarkana, TX-AR MSA, in southwest Arkansas and northeast Texas.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 4 low-, 7 moderate-, 18 middle-, 10 upper-income census tracts, and 1 tract with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Texarkana MS MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	10.0	17.5	45.0	25.0	2.5
Population by Geography	135,493	7.3	16.4	49.9	26.4	0.0
Housing Units by Geography	59,587	6.8	17.9	49.8	25.5	0.0
Owner-Occupied Units by Geography	32,605	3.1	14.0	51.2	31.6	0.0
Occupied Rental Units by Geography	17,915	12.4	23.8	47.1	16.8	0.0
Vacant Units by Geography	9,067	9.1	20.0	49.9	21.0	0.0
Businesses by Geography	10,658	10.3	16.8	41.9	30.8	0.2
Farms by Geography	258	2.3	8.9	57.0	31.8	0.0
Family Distribution by Income Level	33,521	22.1	17.6	19.6	40.6	0.0
Household Distribution by Income Level	50,520	26.9	13.8	17.8	41.5	0.0
Median Family Income MSA - 45500 Texarkana, TX-AR MSA		\$63,851	Median Housing Value Median Gross Rent Families Below Poverty Level			\$118,298 \$768 13.7%
<small>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</small>						

According to Moody’s Analytics, major employers in the area consist of Christus St. Michael Health Care, Red River Army Depot, Cooper Tire & Rubber, Graphic Packaging, and Walmart Inc. The following table lists annual unemployment rates over the evaluation period for the AA, State of Arkansas, State of Texas, and nationwide.

Unemployment Rates Texarkana MS MSA AA			
Area	2022	2023	2024
	%	%	%
Bowie County	4.6	4.2	4.1
Miller County	4.2	3.9	4.3
State of Arkansas	3.2	3.1	3.5
State of Texas	3.9	4.0	4.1
National Average	3.6	3.6	4.1

Source: Bureau of Labor Statistics

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 44 offices from its 18 institutions serving about 3,079 people on average. Bank OZK ranked 8th in deposit market share by capturing 5.8 percent of the area’s deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. This information helps determine whether the local financial institutions are responsive to these needs. It also shows what credit and CD opportunities are available.

Examiners contacted a local representative that focuses on partnering with local businesses, organizations, and community leaders to help assist with economic growth in the area. The contact stated the economic conditions are stable with slow steady growth. However, there continues to be a high demand for affordable housing coupled with a shortage of for-sale and rental units that are affordable to LMI individuals. The contact noted the area is like most in the U.S. and is experiencing an affordability gap when it comes to housing. Conversely, local businesses in and around the area are continuing to grow, though growth is uneven and concentrated in certain sectors. Affordable housing and economic development continue to be the focus in and around the Texarkana area, according to the contact. Overall, the contact indicated that access to financial services is adequate and the entity routinely works with financial institutions to help assist the community with affordable housing and other CD needs.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area’s primary credit needs include residential and small business loans. With respect to the area’s CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

SCOPE OF EVALUATION – TEXARKANA MS MSA

For the Lending Test, examiners considered the following loans granted inside the bank’s Texarkana MS MSA AA as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 4 loans totaling \$584,000
- 2023: 5 loans totaling \$317,000
- 2024: 3 loans totaling \$344,000

Small Business Loans

- 2022: 20 loans totaling \$3,467,000
- 2023: 21 loans totaling \$4,646,000
- 2024: 14 loans totaling \$2,257,000

Inconsistent with the weighting described at the institution level, examiners placed greater weight on small business loans when arriving at applicable conclusions for the Texarkana MS MSA due to the volume of lending. For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXARKANA MS MSA

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the Texarkana MS MSA regarding the Lending Test. Adequate records regarding the bank’s lending levels, geographic distribution, and CD lending outweigh the very poor borrower profile performance to support this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs in the Texarkana MS MSA. Adequate performance regarding both small business and home mortgage loans in the Texarkana MS MSA AA supports this conclusion.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Texarkana MS MSA AA. For 2023, the bank originated 21 reportable small business loans totaling approximately \$4.6 million inside the AA. Bank OZK captured 0.9 percent market share of the total number of small business loans and 3.6 percent market share of the total dollar volume of the loans. This volume of activity ranks the bank 18th of 66 total lenders in the AA and ranks the bank in the top third of lenders reporting such loans, at 27.3 percent.

Home Mortgage Loans

Home mortgage lending levels reflects adequate responsiveness to AA credit needs in the Texarkana MS MSA AA. For 2024, the bank originated 3 reportable home mortgage loans totaling approximately \$344.0 thousand inside the AA. Bank OZK captured 0.1 percent market share of the total number of home mortgage loans and 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 86th of 186 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 46.2 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Texarkana MS MSA. Adequate performance regarding small business loans outweighs poor performance regarding home mortgage loans in the Texarkana MS MSA AA to support this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Texarkana MS MSA AA. Adequate performance in the moderate-income geographies outweighs good performance in the low-income geographies to support this conclusion. As seen in the following table, the bank's lending in low-income census tracts rises 11.3 percentage points above aggregate data, reflective of good performance. The table also shows in moderate-income census tracts the bank's level of lending falls 6.9 percentage points below aggregate data, reflective of adequate performance. Further, the table shows in low-income geographies the bank's level falls within a good range of available D&B data while in moderate-income geographies the bank's level falls within an adequate range of available D&B data.

Geographic Distribution of Small Business Loans Texarkana MS MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	9.9	7.8	4	19.1	617	13.3
Moderate	16.6	16.4	2	9.5	750	16.1
Middle	41.4	41.2	8	38.1	2,019	43.5
Upper	31.8	34.4	6	28.6	615	13.2
NA	0.2	0.2	1	4.8	645	13.9
Total	100.0	100.0	21	100.0	4,646	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor performance in the Texarkana MS MSA AA. Poor performance in moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion. As seen in the following table, the bank's lending in low-income census tracts falls 2.0 percentage points below aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank's level of lending falls 13.5 percentage points below aggregate data, reflective of poor performance.

Geographic Distribution of Home Mortgage Loans Texarkana MS MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	3.1	2.0	0	0.0	0	0.0
Moderate	14.0	13.5	0	0.0	0	0.0
Middle	51.2	49.8	1	33.3	22	6.4
Upper	31.6	34.7	2	66.7	322	93.6
Total	100.0	100.0	3	100.0	344	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, very poor penetration among retail customers of different income levels and business customers of different sizes in the Texarkana MS MSA. Very poor performance regarding small business lending outweighs excellent performance regarding home mortgage lending in the Texarkana MS MSA AA to support this conclusion.

Small Business Loans

The distribution of borrowers reflects very poor penetration among business customers of different sizes in the Texarkana MS MSA AA. Very poor performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank's level of lending to businesses with gross annual revenues of \$1 million or less falls 35.6 percentage points below the aggregate data, reflecting very poor performance. The bank's level also clearly trails available D&B data.

Distribution of Small Business Loans by Gross Annual Revenue Category Texarkana MS MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	85.5	54.7	4	19.1	432	9.3
> \$1,000,000	3.4	--	15	71.4	3,987	85.8
Revenue Not Available	11.1	--	2	9.5	227	4.9
Total	100.0	100.0	21	100.0	4,646	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.</i>						

Home Mortgage Loans

The distribution of borrowers reflects excellent penetration among retail customers of different income levels in the Texarkana MS MSA AA. Excellent performance to moderate-income borrowers outweighs adequate performance to low-income borrowers to support this conclusion. As seen in the following table, the bank’s level of lending to low-income borrowers falls 3.0 percentage points below aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank’s level rises 56.2 percentage points above aggregate data, reflective of excellent performance.

Distribution of Home Mortgage Loans by Borrower Income Level Texarkana MS MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.1	3.0	0	0.0	0	0.0
Moderate	17.6	10.5	2	66.7	36	10.5
Middle	19.6	17.1	0	0.0	0	0.0
Upper	40.6	40.7	1	33.3	308	89.5
Income Not Available	0.0	28.7	0	0.0	0	0.0
Total	100.0	100.0	3	100.0	344	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Community Development Loans

The institution has made an adequate level of CD loans in the Texarkana MS MSA. As reflected in the following table, the institution granted 2 CD loans totaling approximately \$2.9 million benefiting the Texarkana MS MSA AA during the evaluation period. The dollar amount equates to 0.2 percent of the bank’s overall leader level of CD loans. As noted, the Texarkana MS MSA contributed 0.8 percent of reported loans. The current level reflects a decrease in the number and dollar volume from the 3 CD loans totaling \$5.5 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area Texarkana MS MSA										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Texarkana MS MSA AA	2	2,938	0	0	0	0	0	0	2	2,938
<i>Source: Bank Data</i>										

In addition to reflecting an adequate level, the CD loans reflect adequate responsiveness to identified needs. As previously noted, activities that provide affordable housing represent CD needs in the bank’s AA.

The following provides an example of the bank’s CD lending activities in the Texarkana MS MSA AA:

- **Affordable Housing** – The bank originated a \$2.2 million loan to finance the purchase of a multi-family housing complex. The majority of the rents for these units are restricted to LMI individuals/families.

INVESTMENT TEST

Bank OZK demonstrated a high satisfactory record in the Texarkana MS MSA regarding the Investment Test. A significant level of QIs coupled with excellent responsiveness to credit and CD needs outweighs the occasional use of innovative and/or complex investments to support this conclusion.

Investment and Grant Activity

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors in the Texarkana MS MSA. The following table shows that Bank OZK made 11 QIs totaling approximately \$4.3 million. By dollar volume, this equates to 0.5 percent of the bank’s overall excellent level of QIs. As noted, the Texarkana MS MSA contributed 0.6 percent of the bank’s total deposits. The current level reflects an increase in the number and a decrease in the dollar volume when compared to the 10 QIs totaling approximately \$7.7 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area Texarkana MS MSA										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Texarkana MS MSA AA	4	4,316	7	26	0	0	0	0	11	4,342
<i>Source: Bank Data</i>										

The following lists an example of a QI in the Texarkana MS MSA AA:

- **Affordable Housing** – The bank maintained an investment of \$3.4 million in a LIHTC multi-fund that provides housing for LMI individuals/families.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Texarkana MS MSA. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives in the Texarkana MS MSA. For example, the bank has a prior period complex QI for approximately \$3.4 million in a LIHTC within the Texarkana MS MSA AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Texarkana MS MSA regarding the Service Test. A relatively high level of CD services coupled with services that do not vary in a way that inconveniences portions of the AA lifts delivery systems that are accessible to limited portions of the AA to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the Texarkana MS MSA. Limited branch accessibility outweighs the reasonably accessible alternative delivery systems to support this conclusion. The performance reflects inconsistent conclusions that are below that of the institution's Accessibility of Delivery Systems performance.

Bank OZK's branch distribution is accessible to limited portions of the Texarkana MS MSA AA. As reflected in the following table, the bank's lack of branches in low-income census tracts falls 7.3 percentage points below the population percentage residing in these tracts, reflecting reasonable accessibility. The bank's level in moderate-income census tracts falls 16.4 percentage points below the population percentage residing in these tracts, reflecting inaccessibility. Census tract income designation changes as a result of the 2020 U.S. Census Data affected Bank OZK's branch distribution in the Texarkana MS MSA AA. Although Bank OZK did not close any branches in this AA, the bank operated one branch in a census tract previously designated moderate-income according to the 2015 American Community Survey Data at the prior evaluation.

Branch and ATM Distribution by Geography Income Level Texarkana MS MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	4	10.0	9,831	7.3	0	0.0	0	0.0
Moderate	7	17.5	22,216	16.4	0	0.0	0	0.0
Middle	18	45.0	67,671	49.9	1	50.0	1	50.0
Upper	10	25.0	35,743	26.4	1	50.0	1	50.0
NA	1	2.5	32	<0.1	0	0.0	0	0.0
Total	40	100.0	135,493	100.0	2	100.0	2	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

Bank OZK’s alternative delivery systems and product offerings demonstrate reasonable accessibility to essentially all portions of the bank’s rated area. The prior table shows that, similar to branches, the bank does not operate any ATMs in LMI census tracts in the Texarkana MS MSA AA. However, refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AA.

Changes in Branch Locations

Bank OZK did not make any changes to branch locations in the Texarkana MS MSA since the previous evaluation. Therefore, examiners did not consider this factor when evaluating the bank’s retail banking services.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Texarkana MS MSA. The Texarkana MS MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the Texarkana MS MSA. As seen in the following table, Bank OZK provided 21 CD services since the previous evaluation in this rated area. This represents 0.8 percent of the bank’s total relatively high level of CD services, and the Texarkana MS MSA contained 0.8 percent of the bank’s total branches. A substantial majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the nine CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area Texarkana MS MSA					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Texarkana MS MSA AA	3	18	0	0	21
<i>Source: Bank Data</i>					

The following lists an example of a CD service the bank provided in the Texarkana MS MSA AA:

- **Community Services** – A bank employee served on the Board of Directors for a non-profit organization that provides the AA with a food pantry and emergency assistance for LMI individuals/families experiencing financial hardships and homelessness. The employee used expertise to aid in the financial aspects of the organization. Thus, the activity provides community services primarily to LMI individuals.

STATE OF ARKANSAS

CRA RATING FOR ARKANSAS: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN STATE OF ARKANSAS

Bank OZK designated six AAs in the State of Arkansas as noted in the table below. The Jonesboro MSA AA reflects a new AA since the previous evaluation. However, examiners did not assess the bank’s lending performance in the new area or provide separate conclusions due to the timing of the branch opening within the AA on June 24, 2024. Any qualified CD activity in this AA is reflected under statewide activity for the State of Arkansas as a whole.

Description of Assessment Areas State of Arkansas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Fayetteville MSA AA	Benton, Washington	111	13
Fort Smith MSA AA	Crawford, Sebastian	46	7
Hot Springs MSA AA	Garland	30	7
Jonesboro MSA AA	Craighead	22	1
Little Rock MSA AA	Faulkner, Lonoke, Pulaski, Saline	183	25
AR Non-MSA AA	Baxter, Boone, Clark, Franklin, Hempstead, Hot Spring, Johnson, Logan, Marion, Newton, Pope, Searcy, Van Buren	89	22

Source: Bank Data; 2020 U.S. Census Data

SCOPE OF EVALUATION – STATE OF ARKANSAS

For the Lending Test, examiners considered the following loans granted inside the bank’s State of Arkansas AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 328 loans totaling \$65,694,000
- 2023: 243 loans totaling \$38,263,000
- 2024: 578 loans totaling \$87,456,000

Small Business Loans

- 2022: 331 loans totaling \$71,133,000
- 2023: 266 loans totaling \$53,531,000
- 2024: 271 loans totaling \$58,006,000

Consistent with the weighting described at the institution level, examiners placed more weight on home mortgage loans when arriving at applicable conclusions for the State of Arkansas due to the volume of lending.

The following table shows that the Little Rock MSA AA accounted for the largest volume of the bank’s loans, deposits, and branches in the State of Arkansas. Consequently, examiners applied full-scope procedures and weighed performance in the Little Rock MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the remaining AAs and generally weighed performance in each area consistent with the lending level reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Arkansas						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Fayetteville MSA AA	49,498	12.9	833,617	6.7	13	17.6
Fort Smith MSA AA	28,994	7.5	341,527	2.8	7	9.5
Hot Springs MSA AA	33,234	8.6	566,878	4.6	7	9.5
Little Rock MSA AA	208,490	54.3	9,562,990	77.1	25	33.8
AR Non-MSA AA	64,090	16.7	1,093,236	8.8	22	29.7
Total	384,306	100.0	12,398,248	100.0	74	100.0

*Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.*

For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF ARKANSAS

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the State of Arkansas regarding the Lending Test. Adequate records regarding the bank’s geographic distribution, borrower profile, and CD lending outweigh the excellent lending levels to support this conclusion. This performance is consistent in all five AAs.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the State of Arkansas. Excellent performance regarding home mortgage loans outweighs good performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Arkansas. For 2024, the bank originated 578 reportable home mortgage loans totaling approximately \$87.5 million in the State of Arkansas AAs. Bank OZK captured 1.1 percent market share of the total number of home mortgage loans and 0.7 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 22nd of 633 total lenders in the bank's State of Arkansas AAs. This ranking lands the bank in the top 5.0 percent of lenders reporting such loans, at 3.5 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the State of Arkansas. For 2023, the bank originated 266 reportable small business loans totaling approximately \$53.5 million in the State of Arkansas AAs. Bank OZK captured 0.7 percent market share of the total number of small business loans and 3.0 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 23rd of 160 total lenders in the bank's State of Arkansas AAs. This ranking lands the bank in the top 15.0 percent of lenders reporting such loans, at 14.4 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs in the State of Arkansas. This performance is consistent in all five AAs.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the State of Arkansas. This performance is consistent in all five AAs.

Community Development Loans

The institution has made an adequate level of CD loans in the State of Arkansas. The Fort Smith MSA AA, Hot Springs MSA AA, Little Rock MSA AA, and AR Non-MSA AA demonstrated consistent performance, while the Fayetteville MSA AA's performance rises above the rated area's record.

The following table shows that since the previous evaluation, the bank granted 37 CD loans totaling approximately \$85.3 million in the State of Arkansas. The dollar amount equates to 4.8 percent of the bank's overall leader level of CD loans. As noted, the State of Arkansas contributed 25.1 percent of reported loans. The current level reflects a decrease in the number and dollar volume from the 102 CD loans totaling \$90.7 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area State of Arkansas										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Fayetteville MSA AA	3	23,028	0	0	0	0	0	0	3	23,028
Fort Smith MSA AA	4	969	1	750	1	3,642	0	0	6	5,361
Hot Springs MSA AA	0	0	0	0	1	4,252	0	0	1	4,252
Little Rock MSA AA	10	24,102	2	3,000	7	11,222	1	100	20	38,424
AR Non-MSA AA	3	1,509	0	0	4	12,774	0	0	7	14,283
Total	20	49,608	3	3,750	13	31,890	1	100	37	85,348
<i>Source: Bank Data</i>										

The CD loans reflect good responsiveness to the state’s CD needs. Although the bank’s CD loans primarily supported affordable housing and economic development efforts, they also demonstrated responsiveness to the identified needs of community service and revitalization or stabilization efforts.

INVESTMENT TEST

Bank OZK demonstrated a high satisfactory record in the State of Arkansas regarding the Investment Test. A significant level of QIs coupled with excellent responsiveness to credit and CD needs outweighs the occasional use of innovative and/or complex investments to support this conclusion. The Hot Springs MSA AA and AR Non-MSA AA demonstrated consistent performance. The Fayetteville MSA AA and Fort Smith MSA AA demonstrated inconsistent performance, rising above the rated area’s record while the Little Rock MSA AA demonstrated inconsistent performance falling below the rated area’s level.

Investment and Grant Activity

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors in the State of Arkansas. The following table shows that Bank OZK made 210 QIs totaling approximately \$159.5 million in the State of Arkansas. By dollar volume, this equates to 16.8 percent of the bank’s overall excellent level of QIs. As noted, the State of Arkansas contributed 37.6 percent of the bank’s total deposits. The current level reflects an increase from the 122 QIs totaling \$70.9 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area State of Arkansas										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Fayetteville MSA AA	8	45,896	5	13	3	35	0	0	16	45,944
Fort Smith MSA AA	0	0	15	8,935	1	2	0	0	16	8,937
Hot Springs MSA AA	3	2,070	4	5,023	0	0	0	0	7	7,093
Little Rock MSA AA	24	55,082	95	10,558	13	163	11	60	143	65,863
AR Non-MSA AA	8	8,176	7	2,074	2	5	0	0	17	10,255
Statewide Activities	4	18,648	5	255	2	2,483	0	0	11	21,386
Total	47	129,872	131	26,858	21	2,688	11	60	210	159,478
<i>Source: Bank Data</i>										

The following lists an example of a QI in the broader statewide area:

- **Affordable Housing** – The bank invested over \$18.6 million in several MBSs with LMI borrowers located outside of the bank’s AAs but within the State of Arkansas.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the State of Arkansas. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need in the rated area. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives in the State of Arkansas. For example, the bank has several prior period complex QIs for approximately \$10.8 million in LIHTCs within the State of Arkansas.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the State of Arkansas regarding the Service Test. The adequate level of CD services, reasonable accessibility of delivery systems, services that do not vary in a way that inconveniences portions of the AAs, and changes in branches locations that have generally not adversely affected the accessibility of its delivery systems support this conclusion. This performance is consistent in all AAs with the exception of the AR Non-MSA AA where the AA level rises above the rated area level.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s AAs in the State of Arkansas. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion. This performance reflects consistent conclusions with the institution’s Accessibility of Delivery Systems performance.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the AAs in the State of Arkansas. As reflected in the following table, the distribution of Bank OZK’s branches in low-income census tracts trails the population percentage by 3.0 percentage points, reflecting reasonable accessibility. The table further shows that in moderate-income census tracts, the bank’s level rises above the population percentage by 6.0 percentage points, also reflecting reasonable accessibility.

Branch and ATM Distribution by Geography Income Level State of Arkansas								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	24	5.0	84,151	4.3	1	1.3	1	1.3
Moderate	98	20.4	381,302	19.3	19	25.3	20	26.0
Middle	233	48.4	951,179	48.1	31	41.3	32	41.6
Upper	122	25.4	555,624	28.1	24	32.0	24	31.2
NA	4	0.8	5,929	0.3	0	0.0	0	0.0
Total	481	100.0	1,978,185	100.0	75	100.0	77	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

Bank OZK’s alternative delivery systems and product offerings also demonstrate reasonable accessibility to essentially all portions of the bank’s rated area. In both LMI census tracts, Bank OZK’s percentage of ATMs is similar to that of the branches. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the State of Arkansas. During the evaluation period, the bank opened one branch in a moderate-income census tract. The remaining one branch opening occurred in an upper-income census tract and the one branch closing occurred in a middle-income census tract in the State of Arkansas.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals in the State of Arkansas. The State of Arkansas reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides an adequate level of CD services in the State of Arkansas. As seen in the following table, Bank OZK provided 585 CD services since the previous evaluation in this rated area. This represents 23.0 percent of the bank’s total relatively high level of CD services, and the State of Arkansas contained 31.3 percent of the bank’s total branches. A substantial majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 148 CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area State of Arkansas					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Fayetteville MSA AA	5	77	14	14	110
Fort Smith MSA AA	1	53	0	0	54
Hot Springs MSA AA	3	61	0	0	64
Little Rock MSA AA	4	178	24	20	226
AR Non-MSA AA	1	115	4	0	120
Statewide Activities	0	10	1	0	11
Total	14	494	43	34	585
<i>Source: Bank Data</i>					

The following point highlights a statewide CD service the bank provided:

- **Community Services** – A bank employee served on the Board of Directors for a non-profit organization that provides after school programs for children in the public school system; a majority of the children in the district receive free and reduced lunch. The employee used expertise to aid in the financial aspects of the organization. Thus, the activity provides community services primarily to LMI individuals.

LITTLE ROCK MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN LITTLE ROCK MSA AA

Bank OZK designated all 183 census tracts that make up Faulkner, Lonoke, Pulaski, and Saline Counties, four of the six counties that make up the Little Rock-North Little Rock-Conway, AR MSA, located in central Arkansas.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 16 low-, 38 moderate-, 80 middle-, 47 upper-income census tracts, and 2 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Little Rock MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	183	8.7	20.8	43.7	25.7	1.1
Population by Geography	720,054	6.6	19.2	45.3	28.8	0.1
Housing Units by Geography	314,555	7.6	20.2	44.3	27.9	0.0
Owner-Occupied Units by Geography	176,846	3.6	15.0	47.5	33.9	0.0
Occupied Rental Units by Geography	102,213	12.3	27.6	39.0	21.2	0.0
Vacant Units by Geography	35,496	14.3	24.8	43.5	17.4	0.0
Businesses by Geography	71,657	6.2	18.3	37.6	37.6	0.2
Farms by Geography	1,158	1.6	16.0	46.0	36.4	0.1
Family Distribution by Income Level	176,031	22.8	16.3	19.5	41.4	0.0
Household Distribution by Income Level	279,059	24.3	16.8	16.7	42.2	0.0
Median Family Income MSA - 30780 Little Rock-North Little Rock-Conway, AR MSA		\$72,289	Median Housing Value Median Gross Rent Families Below Poverty Level			\$164,895 \$859 10.2%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

The Federal Emergency Management Agency (FEMA) issued a disaster declaration on April 2, 2023, for Lonoke and Pulaski Counties due to severe storms and tornadoes. FEMA also issued disaster declarations for Faulkner and Lonoke Counties on November 14, 2023, and on May 21, 2025, for Lonoke, Pulaski, and Saline Counties due to severe storms, tornadoes, and flooding.

According to Moody’s Analytics, major employers in the area consist of University of Arkansas for Medical Sciences, Baptist Health, Little Rock Air Force Base, Arkansas Children’s Hospital, and Central Arkansas Veterans Healthcare System. The following table lists annual unemployment rates over the evaluation period for the AA, State of Arkansas, and nationwide.

Unemployment Rates Little Rock MSA AA			
Area	2022	2023	2024
	%	%	%
Faulkner County	2.8	2.8	3.0
Lonoke County	2.7	2.6	2.9
Pulaski County	3.3	3.1	3.5
Saline County	2.6	2.6	2.8
State of Arkansas	3.2	3.1	3.5
National Average	3.6	3.6	4.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 286 offices from its 40 institutions serving about 2,518 people on average. Bank OZK ranked 1st in deposit market share by capturing 25.8 percent of the area’s deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local government housing authority located in the AA. The contact stated that the economic conditions are stable. The contact noted that the affordability range for housing is better than other markets, but that prices have gone up over the past several years. Additionally, the contact noted the greatest credit need in the area is affordable housing to support LMI individuals, as construction of affordable single-family and multi-family housing is very low. Overall, the contact indicated that access to financial services is adequate, and area banks are proactive in developing relationships in the community to support the credit needs of area residents.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area’s primary credit needs include residential and small business loans. With respect to the area’s CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN LITTLE ROCK MSA AA

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the Little Rock MSA AA regarding the Lending Test. Adequate records regarding the bank's geographic distribution, borrower profile, and CD lending outweigh excellent lending activity performance to support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Little Rock MSA AA. Excellent performance regarding home mortgage lending levels outweighs good small business lending levels to support this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Little Rock MSA AA. For 2024, the bank originated 242 reportable home mortgage loans totaling approximately \$42.2 million inside the AA. Bank OZK captured 1.2 percent market share of the total number of home mortgage loans and 0.9 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 28th of 439 total lenders in the AA and ranks the bank in the top 10.0 percent of lenders reporting such loans, at 6.4 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the Little Rock MSA AA. For 2023, the bank originated 162 reportable small business loans totaling approximately \$32.7 million inside the AA. Bank OZK captured 0.9 percent market share of the total number of small business loans and 4.6 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 18th of 110 total lenders in the AA and ranks the bank in the top 20.0 percent of lenders reporting such loans, at 16.4 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Little Rock MSA AA. Adequate performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Little Rock MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts rises 3.9 percentage points above aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank's level of lending rises 2.4 percentage points above aggregate data, also reflective of adequate performance.

Geographic Distribution of Home Mortgage Loans Little Rock MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	3.6	3.5	18	7.4	8,212	19.5
Moderate	15.0	13.3	38	15.7	7,827	18.6
Middle	47.5	50.1	106	43.8	14,156	33.6
Upper	33.9	33.2	80	33.1	11,966	28.4
Total	100.0	100.0	242	100.0	42,161	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Little Rock MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts rises 4.1 percentage points above aggregate data, reflective of adequate performance. The table also shows in moderate-income census tracts the bank's level of lending rises 0.8 percentage points above aggregate data, also reflective of adequate performance. Further, the table shows in both LMI geographies the bank's levels fall within adequate ranges of available D&B data.

Geographic Distribution of Small Business Loans Little Rock MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	6.5	5.8	16	9.9	3,482	10.6
Moderate	19.2	17.7	30	18.5	6,912	21.1
Middle	39.2	41.5	58	35.8	10,673	32.6
Upper	34.9	35.0	58	35.8	11,658	35.6
NA	0.3	0.1	0	0.0	0	0.0
Total	100.0	100.0	162	100.0	32,725	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Little Rock MSA AA. Adequate performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Little Rock MSA AA. Adequate performance to both LMI borrowers supports this conclusion. As seen in the following table, the bank's level of lending to low-income borrowers falls 5.2 percentage points below aggregate data, reflective of adequate performance.

The table further shows that to moderate-income borrowers, the bank’s level falls 5.9 percentage points below aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Little Rock MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.8	7.3	5	2.1	238	0.6
Moderate	16.3	15.0	22	9.1	1,971	4.7
Middle	19.5	17.4	25	10.3	2,463	5.8
Upper	41.4	29.7	96	39.7	16,133	38.3
Income Not Available	0.0	30.6	94	38.8	21,356	50.7
Total	100.0	100.0	242	100.0	42,161	100.0

*Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Little Rock MSA AA. Adequate performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank’s level of lending to businesses with gross annual revenues of \$1 million or less falls below D&B data but rises 2.6 percentage points above the aggregate data, reflecting adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Little Rock MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	86.3	51.7	88	54.3	16,454	50.3
> \$1,000,000	3.6	--	73	45.1	16,211	49.5
Revenue Not Available	10.1	--	1	0.6	60	0.2
Total	100.0	100.0	162	100.0	32,725	100.0

*Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available
Due to rounding, totals may not equal 100.0.*

Community Development Loans

The institution has made an adequate level of CD loans in the Little Rock MSA AA. As noted under the rated area section, the bank originated 20 CD loans totaling approximately \$38.4 million in the Little Rock MSA AA. The dollar amount equates to 45.0 percent of the bank’s overall adequate level of CD loans in the State of Arkansas. As noted, the Little Rock MSA AA contributed 54.3 percent of reported loans for the State of Arkansas. The current level reflects a decrease in the number and dollar volume from the 63 CD loans totaling \$62.7 million in this AA at the prior evaluation.

In addition, the CD loans reflect good responsiveness to the AA's CD needs. The bank's CD loans primarily supported affordable housing efforts and were also responsive to identified needs of community service, economic development, and revitalization or stabilization efforts.

The following lists an example of a CD loan within the Little Rock MSA AA:

- ***Affordable Housing*** – The bank originated a \$15.1 million loan to finance the construction of a 60-unit multi-family housing complex. The rents for these units are restricted to LMI individuals/families. Additionally, the housing complex is located in a low-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated a low satisfactory record in the Little Rock MSA AA regarding the Investment Test. An adequate level of QIs and occasional use of innovative and/or complex investments outweigh excellent responsiveness to support this conclusion.

Investment and Grant Activity

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors in the Little Rock MSA AA. As noted in the rated area section, the bank made 143 QIs totaling approximately \$65.9 million in the Little Rock MSA AA. The dollar amount equates to 41.3 percent of the bank's overall significant level of QIs in the State of Arkansas. As noted, the Little Rock MSA AA accounted for 77.1 percent of the bank's deposits for the State of Arkansas. The current level reflects an increase from the 76 QIs totaling approximately \$33.6 million in this AA at the prior evaluation.

The following lists an example of a QI in the Little Rock MSA AA:

- ***Affordable Housing*** – The bank invested over \$39.7 million in LIHTCs to support affordable housing projects for individuals/families throughout the AA. These projects will add approximately 291 affordable housing units to the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Little Rock MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank's Little Rock MSA AA. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives in the Little Rock MSA AA. The bank has approximately \$54.4 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank has several prior period complex QIs for approximately \$9.6 million in LIHTCs within the Little Rock MSA AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Little Rock MSA AA regarding the Service Test. The adequate level of CD services, reasonable accessibility of delivery systems, services that do not vary in a way that inconveniences portions of the AA, and opening and closing of branches that have generally not adversely affected the accessibility of delivery systems support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Little Rock MSA AA. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the Little Rock MSA AA. As reflected in the following table, the bank does not operate any branches in the low-income census tracts in the AA; however, this reflects reasonable accessibility considering only 6.6 percent of the population resides in these census tracts. The table also shows that in moderate-income census tracts, the bank’s distribution of branches rises slightly above the population percentage by 0.8 percentage points, which also reflects reasonable accessibility.

Branch and ATM Distribution by Geography Income Level Little Rock MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	16	8.7	47,834	6.6	0	0.0	0	0.0
Moderate	38	20.8	138,018	19.2	5	20.0	5	19.2
Middle	80	43.7	326,237	45.3	10	40.0	11	42.3
Upper	47	25.7	207,396	28.8	10	40.0	10	38.5
NA	2	1.1	569	0.1	0	0.0	0	0.0
Total	183	100.0	720,054	100.0	25	100.0	26	100.0

*Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0.*

The bank’s alternative delivery systems and product offerings demonstrate reasonable accessibility to essentially all portions of the AA. Bank OZK’s distribution of ATMs in LMI census tracts reflects a similar distribution to that of the branches in the AA. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals in the Little Rock MSA AA. During the evaluation period, the bank opened one branch located in an upper-income census tract and closed one branch located in a middle-income census tract. No branching changes occurred in LMI census tracts in the AA.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Little Rock MSA AA. The Little Rock MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides an adequate level of CD services in the Little Rock MSA AA. As seen in the table for the State of Arkansas, the bank provided 226 CD services since the previous evaluation in the Little Rock MSA AA. This represents 38.6 percent of the bank's total adequate level of CD services in the State of Arkansas, and the Little Rock MSA AA contained 33.3 percent of the bank's total branches in the State of Arkansas. A significant majority of the activities focused on community services, which demonstrates the bank's responsiveness to an identified CD need. The current level reflects an increase from the 64 CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Little Rock MSA AA:

- ***Community Services*** – Several employees led financial educational sessions for students of local school districts with the majority of students participating in the free and reduced school lunch program. The sessions covered items such as budgeting and savings. Thus, the activities benefit organizations that provide community services primarily to LMI individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions from the limited-scope reviews contributed to the institution's overall performance in the State of Arkansas.

Assessment Area	Lending Test	Investment Test	Service Test
Fayetteville MSA AA	Consistent	Above	Consistent
Fort Smith MSA AA	Consistent	Above	Consistent
Hot Springs MSA AA	Consistent	Consistent	Consistent
AR Non-MSA AA	Consistent	Consistent	Above

Facts and data supporting conclusions for the AAs follow, including a summary of the institution's operations and activities, followed by geographic distribution and borrower profile tables by loan type. The appendices include demographic data for the limited-scope AAs.

Fayetteville MSA AA

The Fayetteville MSA AA consists of all census tracts in Benton and Washington Counties. The bank operates 13 branches in this AA with 1 located in a low-income census tract, 2 located in moderate-income census tracts, 2 located in middle-income census tracts, and 8 located in upper-income census tracts. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	17	3,146
Home Mortgage Loans	113	22,152
Community Development Loans	3	23,028
Investments (New)	2	27,791
Investments (Prior Period)	5	18,081
Donations	9	72
CD Services	110	-
<i>Source: Bank Data</i>		

Fort Smith MSA AA

The Fort Smith MSA AA consists of all census tracts in Crawford and Sebastian Counties. The bank operates seven branches in this AA with one located in a moderate-income census tract, five located in middle-income census tracts, and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	17	2,762
Home Mortgage Loans	42	4,024
Community Development Loans	6	5,361
Investments (New)	0	0
Investments (Prior Period)	3	8,889
Donations	13	48
CD Services	54	-
<i>Source: Bank Data</i>		

Hot Springs MSA AA

The Hot Springs MSA AA consists of all census tracts in Garland County. The bank operates seven branches in this AA with two located in moderate-income census tracts, three located in middle-income census tracts, and two located in upper-income census tracts. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	24	4,527
Home Mortgage Loans	47	5,930
Community Development Loans	1	4,252
Investments (New)	1	4,516
Investments (Prior Period)	2	2,550
Donations	4	27
CD Services	64	-
<i>Source: Bank Data</i>		

AR Non-MSA AA

The AR Non-MSA AA consists of all census tracts in Baxter, Boone, Clark, Franklin, Hempstead, Hot Spring, Johnson, Logan, Marion, Newton, Pope, Searcy, and Van Buren Counties. The bank operates 22 full-service branches in this AA with 8 located in moderate-income census tracts, 11 located in middle-income census tracts, and 3 located in upper-income census tracts. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is above the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	46	10,371
Home Mortgage Loans	134	13,189
Community Development Loans	7	14,283
Investments (New)	2	8,000
Investments (Prior Period)	6	2,174
Donations	9	81
CD Services	120	-
<i>Source: Bank Data</i>		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Fayetteville MSA	113	22,152	4.8	19,016	1.3	0	1.1	16.5	7.1	13.1	47.1	38.1	47.1	34.9	54	38.5	0.2	0.9	0.2
Fort Smith MSA	42	4,024	1.8	4,680	0	0	0	14.7	14.3	15.7	48.4	52.4	48.9	36.9	33.3	35.4	0	0	0
Hot Springs MSA	47	5,930	2	2,545	0	0	0	24	29.8	23.5	54.3	48.9	50.4	21	21.3	25.4	0.7	0	0.6
AR Non-MSA	134	13,189	5.7	7,157	0	0	0	8.6	11.2	9.7	69.9	68.7	67.2	21.5	20.2	23	0	0	0

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Fayetteville MSA	17	3,146	0.9	12,334	3.2	5.9	2.4	17.8	5.9	17.1	40.7	41.2	41.7	36.3	47.1	36.7	2	0	2.1
Fort Smith MSA	17	2,762	0.9	3,206	0	0	0	25.2	35.3	22.3	37.8	41.2	41.6	37.1	23.5	36.2	0	0	0
Hot Springs MSA	24	4,527	1.2	2,409	0	0	0	31.9	45.8	29	48.5	29.2	50.3	18.2	16.7	18.7	1.4	8.3	2
AR Non-MSA	46	10,371	2.3	5,655	0	0	0	16.2	26.1	12.6	61.5	56.5	64.8	22.2	17.4	22.6	0	0	0

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Fayetteville MSA	113	22,152	4.8	19,016	20.4	6.2	4.5	18.2	15	13.6	20.3	24.8	18.1	41.1	46	38.2	0	8	25.6
Fort Smith MSA	42	4,024	1.8	4,680	19.3	2.4	4.8	17.4	7.1	14.4	20.8	4.8	18.6	42.6	83.3	35.3	0	2.4	27
Hot Springs MSA	47	5,930	2	2,545	20.6	6.4	7.4	17.9	12.8	13.3	23.3	12.8	15.7	38.1	53.2	40.8	0	14.9	22.8
AR Non-MSA	134	13,189	5.7	7,157	18.6	6.7	4.7	19.6	16.4	14.2	20.8	23.9	21.1	41	42.5	37.3	0	10.5	22.7

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Fayetteville MSA	17	3,146	2.8	12,334	87.1	64.7	54.3	2.9	29.4	10	5.9	
Fort Smith MSA	17	2,762	2.8	3,206	82.7	76.5	52.6	5.1	17.7	12.2	5.9	
Hot Springs MSA	24	4,527	3.9	2,409	87.1	79.2	52.3	3.2	20.8	9.7	0	
AR Non-MSA	46	10,371	7.5	5,655	83.5	56.5	61.7	3.4	41.3	13.1	2.2	

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

STATE OF FLORIDA

CRA RATING FOR FLORIDA: SATISFACTORY

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF FLORIDA

Bank OZK designated nine AAs in the State of Florida as noted in the table below. The West Palm Beach MSA AA reflects a new AA since the previous evaluation. However, examiners did not assess the bank's lending performance in the new area or provide separate conclusions due to the timing of the branch opening within the AA on February 19, 2025. Any qualified CD activity in this AA is reflected under statewide activity for the State of Florida as a whole.

Description of Assessment Areas State of Florida			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Bradenton MSA AA	Manatee, Sarasota	217	7
Cape Coral MSA AA	Lee	223	6
Fort Lauderdale MD AA	Broward	417	1
Jacksonville MSA AA	Duval	219	3
Miami MD AA	Miami-Dade	707	5
Ocala MSA AA	Marion	93	1
Punta Gorda MSA AA	Charlotte	47	3
Tampa-St. Petersburg MSA AA	Hillsborough, Pasco, Pinellas	741	15
West Palm Beach MSA AA	Palm Beach	373	1

Source: Bank Data; 2020 U.S. Census Data

SCOPE OF EVALUATION – STATE OF FLORIDA

For the Lending Test, examiners considered the following loans granted inside the bank's State of Florida AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 218 loans totaling \$76,112,000
- 2023: 149 loans totaling \$40,648,000
- 2024: 290 loans totaling \$62,696,000

Small Business Loans

- 2022: 99 loans totaling \$36,493,000
- 2023: 74 loans totaling \$21,936,000
- 2024: 139 loans totaling \$32,570,000

Consistent with the weighting described at the institution level, examiners placed more weight on home mortgage loans when arriving at applicable conclusions for the State of Florida due to the volume of lending.

The following table shows that the Tampa-St. Petersburg MSA AA accounted for the largest volume of the bank’s loans, deposits, and branches in the State of Florida. Consequently, examiners applied full-scope procedures and weighed performance in the Tampa-St. Petersburg MSA AA heaviest when arriving at applicable conclusions and ratings. In addition, in accordance with outstanding procedures, examiners selected the Bradenton MSA AA for a full-scope review since this area has not been reviewed using full-scope procedures during the previous two evaluations. Examiners applied limited-scope procedures to the remaining AAs and generally weighed performance in each area consistent with the lending level reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Florida						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Bradenton MSA AA	59,688	22.1	911,725	16.6	7	17.1
Cape Coral MSA AA	20,405	7.5	641,213	11.6	6	14.6
Fort Lauderdale MD AA	17,984	6.6	116,130	2.1	1	2.4
Jacksonville MSA AA	15,183	5.6	306,200	5.6	3	7.3
Miami MD AA	28,198	10.4	724,514	13.2	5	12.2
Ocala MSA AA	3,578	1.3	375,540	6.8	1	2.4
Punta Gorda MSA AA	9,476	3.5	464,695	8.4	3	7.3
Tampa-St. Petersburg MSA AA	115,943	42.9	1,967,732	35.7	15	36.6
Total	270,455	100.0	5,507,749	100.0	41	100.0

*Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.*

For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF FLORIDA

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the State of Florida regarding the Lending Test. Adequate records regarding the bank’s geographic distribution and borrower profile performance outweigh the bank’s leader level of CD loans and good lending levels to support this conclusion. The Bradenton MSA AA, Cape Coral MSA AA, Fort Lauderdale Metropolitan Division (MD) AA, Jacksonville MSA AA, Miami MD AA, and Tampa-St. Petersburg MSA AA demonstrated consistent performance, while the Ocala MSA AA and Punta Gorda MSA AA demonstrated inconsistent performance below the rated area’s record.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the State of Florida. Excellent performance regarding home mortgage loans is hampered by the good performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Florida. For 2024, the bank originated 290 reportable home mortgage loans totaling approximately \$62.7 million in the State of Florida AAs. Bank OZK captured 0.1 percent market share of the total number of home mortgage loans and 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 141st of 1,444 total lenders in the bank's State of Florida AAs. This ranking lands the bank in the top 10.0 percent of lenders reporting such loans, at 9.8 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the State of Florida. For 2023, the bank originated 74 reportable small business loans totaling approximately \$21.9 million in the State of Florida AAs. Bank OZK captured 0.02 percent market share of the total number of small business loans and 0.2 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 72nd of 320 total lenders in the bank's State of Florida AAs. This ranking lands the bank in the top quarter of lenders reporting such loans, at 22.5 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs in the State of Florida. The Bradenton MSA AA, Cape Coral MSA AA, Jacksonville MSA AA, Miami MD AA, and Tampa-St. Petersburg MSA AA demonstrated consistent performance. Inconsistent performance in the Fort Lauderdale MD AA, Ocala MSA AA, and Punta Gorda MSA AA fall below the rated area's record.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the State of Florida. The Bradenton MSA AA, Cape Coral MSA AA, Fort Lauderdale MD AA, Jacksonville MSA AA, and Punta Gorda MSA AA demonstrated consistent performance. Inconsistent performance in the Tampa-St. Petersburg MSA AA and Miami MD AA fall below the rated area's record and the record in the Ocala MSA AA rises above the rated area's record.

Community Development Loans

The institution is a leader in making CD loans in the State of Florida. The Cape Coral MSA AA, Fort Lauderdale MD AA, Jacksonville MSA AA, Miami MD AA, and Tampa-St. Petersburg MSA AA demonstrated consistent performance, while the Bradenton MSA AA, Ocala MSA AA, and Punta Gorda MSA AA performance falls below that of the rated area.

The following table shows that since the previous evaluation, the bank granted 30 CD loans totaling approximately \$556.6 million in the State of Florida. The dollar amount equates to 31.5 percent of the bank's overall leader level of CD loans. As noted, the State of Florida contributed 17.7 percent of reported loans. The current level reflects a decrease in the number but an increase in the dollar volume from the 91 CD loans totaling \$235.1 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area State of Florida										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bradenton MSA AA	2	7,925	0	0	1	1,088	0	0	3	9,013
Cape Coral MSA AA	1	23,000	1	45	1	2,625	1	2,300	4	27,970
Fort Lauderdale MD AA	2	10,485	0	0	0	0	1	220,000	3	230,485
Jacksonville MSA AA	0	0	0	0	1	10,780	0	0	1	10,780
Miami MD AA	0	0	0	0	6	21,907	0	0	6	21,907
Ocala MSA AA	0	0	0	0	0	0	0	0	0	0
Punta Gorda MSA AA	0	0	2	100	1	1,130	0	0	3	1,230
Tampa-St. Petersburg MSA AA	6	47,600	2	6,706	1	1,073	1	199,841	10	255,220
Total	11	89,010	5	6,851	11	38,603	3	422,141	30	556,605
<i>Source: Bank Data</i>										

The CD loans reflect good responsiveness to the state's CD needs. Although the bank's CD loans primarily supported revitalization or stabilization efforts, they also demonstrated responsiveness to the identified needs of affordable housing, community service, and economic development efforts.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record in the State of Florida regarding the Investment Test. The significant use of innovative and/or complex QIs is lifted by an excellent level of QIs and excellent responsiveness to CD needs to support this conclusion. Performance in the Cape Coral MSA AA, Jacksonville MSA AA, Miami MD AA, and Tampa-St. Petersburg MSA AA proved consistent, while performance in the Bradenton MSA AA, Fort Lauderdale MD AA, Ocala MSA AA, and Punta Gorda MSA AA proved inconsistent and fall below that of the rated area's level.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the State of Florida. The following table shows that Bank OZK made 140 QIs totaling approximately \$182.8 million in the State of Florida. By dollar volume, this equates to 19.2 percent of the bank's overall excellent level of QIs. As noted, the State of Florida contributed 16.7 percent of the bank's total deposits. The current level reflects an increase from the 107 QIs totaling \$81.0 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area State of Florida										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bradenton MSA AA	9	8,525	5	23	1	3	2	5	17	8,556
Cape Coral MSA AA	3	23,133	2	42	5	30	1	5	11	23,210
Fort Lauderdale MD AA	10	557	0	0	0	0	0	0	10	557
Jacksonville MSA AA	3	12,134	9	27	5	40	0	0	17	12,201
Miami MD AA	10	50,270	9	399	6	1,294	0	0	25	51,963
Ocala MSA AA	1	47	3	15	0	0	0	0	4	62
Punta Gorda MSA AA	0	0	9	32	0	0	0	0	9	32
Tampa-St. Petersburg MSA AA	18	53,126	15	12,761	4	5,015	2	10	39	70,912
Statewide Activities	7	15,291	1	4	0	0	0	0	8	15,295
Total	61	163,083	53	13,303	21	6,382	5	20	140	182,788
<i>Source: Bank Data</i>										

The following lists an example of a QI in the broader statewide area:

- **Affordable Housing** – The bank invested \$15.3 million in several MBSs with LMI borrowers located outside the bank’s AAs but in the State of Florida.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the State of Florida. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need in the rated area. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives in the State of Florida. The bank has approximately \$110.6 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$81.3 million in LIHTCs within the State of Florida.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the State of Florida regarding the Service Test. The changes in branch locations that have generally not adversely affected the accessibility of its delivery systems and services that do not vary in a way that inconveniences portions of the AAs coupled with delivery systems that are accessible to limited portions of the AAs and a relatively high level of CD services support this conclusion. The Bradenton MSA AA, Fort Lauderdale MD AA, Miami MD AA, Ocala MSA AA, Punta Gorda MSA AA, and Tampa-St. Petersburg MSA AA demonstrated consistent performance, while the Cape Coral MSA AA and Jacksonville MSA AA demonstrated inconsistent performance, rising above that of the rated area level.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the AAs in the State of Florida. Limited branch accessibility outweighs the reasonably accessible alternative delivery systems to support this conclusion. This performance reflects inconsistent conclusions below that of the institution's Accessibility of Delivery Systems performance.

Bank OZK's branch distribution is accessible to limited portion of the AAs in the State of Florida. As reflected in the following table, the bank's lack of branches in low-income census tracts falls 4.3 percentage points below the population percentage residing in these tracts, reflecting reasonable accessibility. The table also shows that in moderate-income census tracts, the bank level falls 12.4 percentage points below the population percentage residing in these tracts, reflecting limited accessibility. Census tract income designation changes as a result of the 2020 U.S. Census Data affected Bank OZK's branch distribution.

Branch and ATM Distribution by Geography Income Level State of Florida								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	147	4.8	526,238	4.3	0	0.0	0	0.0
Moderate	792	26.1	3,273,740	26.7	6	14.3	6	14.3
Middle	1,070	35.2	4,412,883	36.0	20	47.6	20	47.6
Upper	931	30.7	3,915,129	31.9	16	38.1	16	38.1
NA	97	3.2	143,963	1.2	0	0.0	0	0.0
Total	3,037	100.0	12,271,953	100.0	42	100.0	42	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

Bank OZK's alternative delivery systems and product offerings demonstrate reasonable accessibility to essentially all portions of the bank's rated area. In LMI census tracts, Bank OZK's percentage of ATMs mirrors that of the branches. However, refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the State of Florida. During the evaluation period, the bank opened one branch in a moderate-income census tract. The remaining four branch openings and four branch closures occurred in middle- and upper-income census tracts, along with a tract with no income designation in the State of Florida.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals in the State of Florida. The State of Florida reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the State of Florida. As seen in the following table, Bank OZK provided 661 CD services since the previous evaluation in this rated area. This represents 26.0 percent of the bank’s total relatively high level of CD services, and the State of Florida contained 17.5 percent of the bank’s total branches. A substantial majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 285 CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area State of Florida					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Bradenton MSA AA	6	79	3	1	89
Cape Coral MSA AA	0	111	0	0	111
Fort Lauderdale MD AA	11	4	0	0	15
Jacksonville MSA AA	4	85	7	0	96
Miami MD AA	0	25	8	0	33
Ocala MSA	0	15	3	0	18
Punta Gorda MSA AA	0	55	0	0	55
Tampa-St. Petersburg MSA AA	7	225	7	5	244
Total	28	599	28	6	661
<i>Source: Bank Data</i>					

BRADENTON MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN BRADENTON MSA AA

Bank OZK designated all 217 census tracts that make up Manatee and Sarasota Counties, the two counties that make up the North Port-Bradenton-Sarasota, FL MSA, located in west-central Florida.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 5 low-, 48 moderate-, 99 middle-, 62 upper-income census tracts, and 3 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Bradenton MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	2.3	22.1	45.6	28.6	1.4
Population by Geography	833,716	2.2	22.3	43.6	31.6	0.2
Housing Units by Geography	439,870	1.8	21.1	45.2	31.8	0.1
Owner-Occupied Units by Geography	255,124	1.2	18.1	46.7	33.8	0.2
Occupied Rental Units by Geography	84,449	3.9	31.6	42.9	21.5	0.1
Vacant Units by Geography	100,297	1.4	19.7	43.4	35.5	0.1
Businesses by Geography	151,047	1.1	16.3	47.8	34.6	0.2
Farms by Geography	1,099	0.4	9.3	41.0	49.3	0.1
Family Distribution by Income Level	216,689	18.8	19.6	20.4	41.2	0.0
Household Distribution by Income Level	339,573	22.0	17.7	18.5	41.8	0.0
Median Family Income MSA - 35840 North Port-Bradenton-Sarasota, FL MSA	\$77,172	Median Housing Value Median Gross Rent Families Below Poverty Level				\$295,896 \$1,299 6.1%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued disaster declarations resulting from the following hurricanes for both counties in the AA: Hurricane Ian (November 4, 2022), Hurricane Idalia (August 31, 2023), Hurricane Debby (August 10, 2024), Hurricane Helene (September 28, 2024), and Hurricane Milton (October 11, 2024).

According to Moody’s Analytics, major employers in the area consist of Sarasota Memorial Health Care System, Publix Super Markets Inc., PGT Industries, Manatee Healthcare System, and Bealls Inc. The following table lists annual unemployment rates over the evaluation period for the AA, State of Florida, and nationwide.

Unemployment Rates Bradenton MSA AA			
Area	2022	2023	2024
	%	%	%
Manatee County	3.0	3.1	3.6
Sarasota County	3.1	3.1	3.6
State of Florida	3.0	3.0	3.4
National Average	3.6	3.6	4.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 241 offices from its 39 institutions serving about 3,459 people on average. Bank OZK ranked 6th in deposit market share by capturing 3.0 percent of the area’s deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local CD financial institution located in the AA. The contact stated that the economic conditions are stable, but that the economy is very seasonal and the area relies heavily on tourism to boost the local economy. The contact noted that the primary demographics of the area are mainly LMI individuals and that affordability is the primary issue. Additionally, the contact noted the greatest credit needs in the area are affordable housing and transportation costs as people are moving further away from city centers to find affordable housing. Overall, the contact indicated that access to financial services is adequate, however the contact believes that banks can always do more to help out with affordable housing issues for LMI individuals.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area’s primary credit needs include residential and small business loans. With respect to the area’s CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN BRADENTON MSA AA

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the Bradenton MSA AA regarding the Lending Test. Adequate records regarding the bank's geographic distribution, borrower profile, and CD lending outweighs excellent lending activity performance to support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Bradenton MSA AA. Excellent performance regarding home mortgage lending levels outweighs adequate small business lending levels to support this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Bradenton MSA AA. For 2024, the bank originated 134 reportable home mortgage loans totaling approximately \$24.8 million inside the AA. Bank OZK captured 0.4 percent market share of the total number of home mortgage loans and 0.2 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 48th of 856 total lenders in the AA and ranks the bank in the top 10.0 percent of lenders reporting such loans, at 5.6 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Bradenton MSA AA. For 2023, the bank originated 12 reportable small business loans totaling approximately \$4.5 million inside the AA. Bank OZK captured 0.04 percent market share of the total number of small business loans and 0.5 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 59th of 158 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 37.3 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Bradenton MSA AA. Adequate performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Bradenton MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts rises 0.9 percentage points above aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank's level of lending rises 5.7 percentage points above aggregate data, also reflective of adequate performance.

Geographic Distribution of Home Mortgage Loans Bradenton MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	1.2	0.6	2	1.5	573	2.3
Moderate	18.1	14.4	27	20.1	3,503	14.1
Middle	46.7	40.0	51	38.1	6,880	27.7
Upper	33.8	42.6	54	40.3	13,859	55.9
NA	0.2	2.5	0	0.0	0	0.0
Total	100.0	100.0	134	100.0	24,815	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Bradenton MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts falls 1.0 percentage points below aggregate data, reflective of adequate performance. The table also shows in moderate-income census tracts the bank's level of lending rises 2.4 percentage points above aggregate data, also reflective of adequate performance. Further, the table shows in both LMI geographies the bank's levels fall within adequate ranges of available D&B data.

Geographic Distribution of Small Business Loans Bradenton MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	1.1	1.0	0	0.0	0	0.0
Moderate	16.3	14.3	2	16.7	470	10.5
Middle	46.9	44.9	6	50.0	2,455	54.9
Upper	35.5	39.3	4	33.3	1,544	34.6
NA	0.3	0.5	0	0.0	0	0.0
Total	100.0	100.0	12	100.0	4,469	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Bradenton MSA AA. Adequate performance regarding home mortgage lending outweighs very poor performance regarding small business lending to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Bradenton MSA AA. Adequate performance to both LMI borrowers supports this conclusion. As seen in the following table, the bank’s level of lending to low-income borrowers falls 0.3 percentage points below aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank’s level falls 2.5 percentage points below aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Bradenton MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	18.8	4.0	5	3.7	450	1.8
Moderate	19.6	11.5	12	9.0	1,023	4.1
Middle	20.4	19.1	24	17.9	2,670	10.8
Upper	41.2	43.1	90	67.2	18,047	72.7
Income Not Available	0.0	22.3	3	2.2	2,625	10.6
Total	100.0	100.0	134	100.0	24,815	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The distribution of borrowers reflects very poor penetration among business customers of different sizes in the Bradenton MSA AA. Very poor performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank’s level of lending to businesses with gross annual revenues of \$1 million or less falls 13.8 percentage points below the aggregate data, reflecting very poor performance. The bank’s level also trails D&B data.

Distribution of Small Business Loans by Gross Annual Revenue Category Bradenton MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	93.3	55.5	5	41.7	2,519	56.4
> \$1,000,000	1.8	--	7	58.3	1,950	43.6
Revenue Not Available	4.9	--	0	0.0	0	0.0
Total	100.0	100.0	12	100.0	4,469	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.</i>						

Community Development Loans

The institution has made an adequate level of CD loans in the Bradenton MSA AA. As noted under the rated area level, the bank originated 3 CD loans totaling approximately \$9.0 million in the Bradenton MSA AA. The dollar amount equates to 1.6 percent of the bank's overall leader level of CD loans in the State of Florida. As noted, the Bradenton MSA AA contributed 22.1 percent of reported loans for the State of Florida. The current level reflects a decrease in the number and dollar volume from the 18 CD loans totaling \$14.3 million in this AA at the prior evaluation.

In addition, the CD loans reflect adequate responsiveness to the AA's CD needs. The bank's CD loans primarily supported affordable housing efforts and demonstrated responsiveness to the identified need for economic development.

The following lists an example of a CD loan within the Bradenton MSA AA:

- ***Affordable Housing*** – The bank originated a \$6.1 million loan to finance the rehabilitation of a 72-unit housing complex serving elderly individuals. The rent for these units is restricted to LMI individuals. Additionally, the housing complex is located in a moderate-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated a high satisfactory record in the Bradenton MSA AA regarding the Investment Test. A significant level of QIs and excellent responsiveness outweighs the occasional use of innovative and/or complex investments to support this conclusion.

Investment and Grant Activity

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors in the Bradenton MSA AA. As noted in the rated area section, the bank made 17 QIs totaling approximately \$8.6 million in the Bradenton MSA AA. The dollar amount equates to 4.7 percent of the bank's overall excellent level of QIs in the State of Florida. As noted, the Bradenton MSA AA accounted for 16.6 percent of the bank's deposits for the State of Florida. The current level reflects an increase from the 10 QIs totaling approximately \$1.8 million in this AA at the prior evaluation.

The following lists an example of a QI in the Bradenton MSA AA:

- ***Affordable Housing*** – The bank invested over \$7.7 million in a LIHTC to support the rehabilitation of an affordable housing project serving LMI elderly individuals in the AA. This project will support the rehabilitation of 72 affordable housing units in the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Bradenton MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank’s Bradenton MSA AA. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution occasionally uses innovative and/or complex investments to support CD initiatives in the Bradenton MSA AA. For example, the bank made a complex QI for approximately \$7.7 million in a LIHTC within the Bradenton MSA AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Bradenton MSA AA regarding the Service Test. The reasonable accessibility of delivery systems and services that do not vary in a way that inconveniences portions of the AA outweigh a relatively high level of CD services to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Bradenton MSA AA. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the Bradenton MSA AA. Although the bank does not operate any branches in the low-income census tracts in the AA as shown in the table below, this reflects reasonable accessibility considering only 2.2 percent of the population resides in these tracts. As further shown in the table, in moderate-income census tracts, the bank’s distribution of branches trails the population percentage by 8.0 percentage points, also reflecting reasonable accessibility.

Branch and ATM Distribution by Geography Income Level Bradenton MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	5	2.3	18,484	2.2	0	0.0	0	0.0
Moderate	48	22.1	186,203	22.3	1	14.3	1	14.3
Middle	99	45.6	363,818	43.6	3	42.9	3	42.9
Upper	62	28.6	263,759	31.6	3	42.9	3	42.9
NA	3	1.4	1,452	0.2	0	0.0	0	0.0
Total	217	100.0	833,716	100.0	7	100.0	7	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

The bank's alternative delivery systems and product offerings demonstrate reasonable accessibility to essentially all portions of the AA. Bank OZK's distribution of ATMs in LMI census tracts reflects the same distribution as that of the branches in the AA. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

Bank OZK did not make any changes to branch locations in the Bradenton MSA AA since the previous evaluation. Therefore, examiners did not consider this factor when evaluating the bank's retail banking services.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Bradenton MSA AA. The Bradenton MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the Bradenton MSA AA. As seen in the table for the State of Florida, the bank provided 89 CD services since the previous evaluation in the Bradenton MSA AA. This represents 13.5 percent of the bank's total relatively high level of CD services in the State of Florida, and the Bradenton MSA AA contained 16.7 percent of the bank's total branches in the State of Florida. A significant majority of the activities focused on community services, which demonstrates the bank's responsiveness to an identified CD need. The current level reflects an increase from the 42 CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Bradenton MSA AA:

- ***Community Services*** – Several employees led financial educational sessions for students of local school districts where the majority of students participate in the free and reduced school lunch program. The sessions covered items such as budgeting and savings. Thus, the activities benefit organizations that provide community services primarily to LMI individuals.

TAMPA-ST. PETERSBURG MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN TAMPA-ST. PETERSBURG MSA AA

Bank OZK designated all 741 census tracts that make up Hillsborough, Pasco, and Pinellas Counties, three of the four counties that make up the Tampa-St. Petersburg-Clearwater, FL MSA, located in northcentral Florida.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 35 low-, 206 moderate-, 263 middle-, 213 upper-income census tracts, and 24 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Tampa-St. Petersburg MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	741	4.7	27.8	35.5	28.7	3.2
Population by Geography	2,980,760	3.9	25.9	35.6	33.5	1.0
Housing Units by Geography	1,348,536	3.7	27.5	36.1	31.5	1.3
Owner-Occupied Units by Geography	754,860	1.6	24.0	36.8	37.1	0.5
Occupied Rental Units by Geography	407,781	7.6	32.0	35.5	22.7	2.2
Vacant Units by Geography	185,895	3.8	31.5	34.5	28.1	2.1
Businesses by Geography	569,241	2.8	20.2	31.3	44.3	1.4
Farms by Geography	3,104	1.3	18.2	36.3	43.6	0.6
Family Distribution by Income Level	710,845	20.7	17.9	19.1	42.3	0.0
Household Distribution by Income Level	1,162,641	23.2	16.6	17.4	42.8	0.0
Median Family Income MD - 41304 St. Petersburg-Clearwater-Largo, FL MD		\$75,478	Median Housing Value			\$225,872
Median Family Income MD - 45294 Tampa, FL MD		\$69,728	Median Gross Rent			\$1,188
			Families Below Poverty Level			8.9%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on November 4, 2022, for Hillsborough and Pinellas Counties for Hurricane Ian. On August 31, 2023, FEMA issued a disaster declaration for Pinellas County due to Hurricane Idalia and on August 10, 2024, Pinellas County also received a disaster declaration resulting from Hurricane Debby. In addition, all three counties received FEMA disaster declarations for Hurricane Helene (September 28, 2024) and Hurricane Milton (October 11, 2024).

According to Moody’s Analytics, major employers in the area consist of Publix Super Markets Inc., BayCare Health System, HCA Healthcare Inc., MacDill Air Force Base, and University of South Florida. The following table lists annual unemployment rates over the evaluation period for the AA, State of Florida, and nationwide.

Unemployment Rates Tampa-St. Petersburg MSA AA			
Area	2022	2023	2024
	%	%	%
Hillsborough County	3.0	3.0	3.4
Pasco County	3.0	3.2	3.7
Pinellas County	2.7	2.8	3.3
State of Florida	3.0	3.0	3.4
National Average	3.6	3.6	4.1

Source: Bureau of Labor Statistics

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 575 offices from its 55 institutions serving about 5,184 people on average. Bank OZK ranked 12th in deposit market share by capturing 1.6 percent of the area’s deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local government economic development agency located in the AA. The contact stated that the economic conditions are stable but still recovering from recent hurricanes that affected the area. The contact noted that the greatest credit needs in the area are affordable housing and small business loans following the damage from recent hurricanes. Overall, the contact indicated that access to financial services is adequate, and the entity routinely works with financial institutions to help meet the needs of the community.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area’s primary credit needs include residential and small business loans. With respect to the area’s CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TAMPA-ST. PETERSBURG MSA AA

LENDING TEST

Bank OZK demonstrated a low satisfactory record in the Tampa-St. Petersburg MSA AA regarding the Lending Test. Good lending levels and a leader level of CD lending are hampered by an adequate record regarding the bank's geographic distribution and poor borrower profile performance to support this conclusion.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the Tampa-St. Petersburg MSA AA. Good performance regarding home mortgage lending levels outweighs adequate small business lending levels to support this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to AA credit needs in the Tampa-St. Petersburg MSA AA. For 2024, the bank originated 94 reportable home mortgage loans totaling approximately \$21.4 million inside the AA. Bank OZK captured 0.1 percent market share of the total number of home mortgage loans and 0.01 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 133rd of 956 total lenders in the AA and ranks the bank in the top 15.0 percent of lenders reporting such loans, at 13.9 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Tampa-St. Petersburg MSA AA. For 2023, the bank originated 28 reportable small business loans totaling approximately \$9.2 million inside the AA. Bank OZK captured 0.03 percent market share of the total number of small business loans and 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 66th of 198 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 33.3 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Tampa-St. Petersburg MSA AA. Adequate performance regarding home mortgage lending performance outweighs good small business lending performance to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Tampa-St. Petersburg MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank’s level of lending in low-income census tracts falls 1.8 percentage points below aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank’s level of lending falls 7.0 percentage points below aggregate data, also reflective of adequate performance.

Geographic Distribution of Home Mortgage Loans Tampa-St. Petersburg MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	1.6	1.8	0	0.0	0	0.0
Moderate	24.0	25.1	17	18.1	2,485	11.6
Middle	36.8	32.3	34	36.2	4,604	21.5
Upper	37.1	40.3	41	43.6	13,536	63.1
NA	0.5	0.5	2	2.1	813	3.8
Total	100.0	100.0	94	100.0	21,438	100.0

*Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

The geographic distribution of small business loans reflects good performance in the Tampa-St. Petersburg MSA AA. Good performance in the moderate-income geographies outweighs adequate performance in the low-income geographies to support this conclusion. As seen in the following table, the bank’s level of lending in low-income census tracts rises 4.1 percentage points above aggregate data, reflective of adequate performance. The table also shows in moderate-income census tracts the bank’s level of lending rises 12.1 percentage points above aggregate data, reflective of good performance. Further, the table shows in low-income geographies, the bank’s level falls within an adequate range of D&B data while in moderate-income geographies, the bank’s level falls within a good range of available D&B data.

Geographic Distribution of Small Business Loans Tampa-St. Petersburg MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.9	3.0	2	7.1	205	2.2
Moderate	20.4	20.0	9	32.1	2,723	29.8
Middle	32.1	33.0	8	28.6	2,731	29.8
Upper	43.2	42.2	8	28.6	3,342	36.5
NA	1.4	1.9	1	3.6	150	1.6
Total	100.0	100.0	28	100.0	9,151	100.0

*Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data
Due to rounding, totals may not equal 100.0.*

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, poor penetration among retail customers of different income levels and business customers of different sizes in the Tampa-St. Petersburg MSA AA. Poor performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects poor penetration among retail customers of different income levels in the Tampa-St. Petersburg MSA AA. Poor performance to moderate-income borrowers outweighs adequate performance to low-income borrowers to support this conclusion. As seen in the following table, the bank’s level of lending to low-income borrowers falls 3.2 percentage points below aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank’s level of lending falls 8.7 percentage points below aggregate data, reflective of poor performance.

Distribution of Home Mortgage Loans by Borrower Income Level Tampa-St. Petersburg MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.7	4.3	1	1.1	30	0.1
Moderate	17.9	11.9	3	3.2	105	0.5
Middle	19.1	19.9	17	18.1	1,875	8.8
Upper	42.3	41.7	62	66.0	11,134	51.9
Income Not Available	0.0	22.2	11	11.7	8,294	38.7
Total	100.0	100.0	94	100.0	21,438	100.0

*Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

The distribution of borrowers reflects poor penetration among business customers of different sizes in the Tampa-St. Petersburg MSA AA. Poor performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank’s level of lending to businesses with gross annual revenues of \$1 million or less falls 8.4 percentage points below the aggregate data, reflecting poor performance. The bank’s level also trails D&B data.

Distribution of Small Business Loans by Gross Annual Revenue Category Tampa-St. Petersburg MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	93.4	54.8	13	46.4	2,992	32.7
> \$1,000,000	1.7	--	14	50.0	5,295	57.9
Revenue Not Available	4.9	--	1	3.6	864	9.4
Total	100.0	100.0	28	100.0	9,151	100.0
Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.						

Community Development Loans

The institution is a leader in making CD loans in the Tampa-St. Petersburg MSA AA. As noted under the rated area level, the bank originated 10 CD loans totaling approximately \$255.2 million in the Tampa-St. Petersburg MSA AA. The dollar amount equates to 45.9 percent of the bank’s overall leader level of CD loans in the State of Florida. As noted, the Tampa-St. Petersburg MSA AA contributed 42.9 percent of reported loans for the State of Florida. The current level reflects a decrease in the number but an increase in the dollar volume of 36 CD loans totaling \$71.7 million in this AA at the prior evaluation.

In addition, the CD loans reflect good responsiveness to the AA’s CD needs. The bank’s CD loans primarily supported revitalization or stabilization efforts and also demonstrated responsiveness to identified needs of affordable housing, community service, and economic development efforts.

The following lists an example of a CD loan within the Tampa-St. Petersburg MSA AA:

- ***Affordable Housing*** – The bank originated a \$15.7 million loan to finance the construction of a 96-unit multi-family housing complex. The rents for these units are restricted to LMI individuals/families. Additionally, the housing complex is located in a moderate-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the Tampa-St. Petersburg MSA AA regarding the Investment Test. The significant use of innovative and/or complex QIs that are not routinely provided by private investors is lifted by an excellent level of QIs and excellent responsiveness to CD needs to support this conclusion.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the Tampa-St. Petersburg MSA AA. As noted in the rated area level, the bank made 39 QIs totaling approximately \$70.9 million in the Tampa-St. Petersburg MSA AA. The dollar amount equates to 38.8 percent of the bank's overall excellent level of QIs in the State of Florida. As noted, the Tampa-St. Petersburg MSA AA accounted for 35.7 percent of the bank's deposits for the State of Florida. The current level reflects an increase from the 21 QIs totaling approximately \$21.9 million in this AA at the prior evaluation.

The following lists an example of a QI in the Tampa-St. Petersburg MSA AA:

- ***Affordable Housing*** – The bank invested over \$20.7 million in a LIHTC to support the rehabilitation of an affordable housing project serving LMI individuals/families in the AA. This project will support the rehabilitation of 148 affordable housing units in the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Tampa-St. Petersburg MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank's Tampa-St. Petersburg MSA AA. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives in the Tampa-St. Petersburg MSA AA. The bank has approximately \$43.8 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$33.8 million in LIHTCs within the AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Tampa-St. Petersburg MSA AA regarding the Service Test. The opening and closing of branches that have generally not adversely affected the accessibility of delivery systems and services that do not vary in a way that inconveniences portions of the AA coupled with delivery systems that are accessible to limited portions of the AA and a relatively high level of CD services support this conclusion.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the Tampa-St. Petersburg MSA AA. Limited branch accessibility outweighs the reasonably accessible alternative delivery systems to support this conclusion.

Bank OZK’s branch distribution is accessible to limited portions of the Tampa-St. Petersburg MSA AA. Although the bank does not operate any branches in the low-income census tracts in the AA as shown in the following table, this reflects reasonable accessibility considering only 3.9 percent of the population resides in these tracts. The table further shows that in moderate-income census tracts, the bank’s distribution of branches trails the population percentage by 19.2 percentage points, reflecting inaccessibility to significant portions of the AA. The reasonable accessibility record in the low-income census tracts helps to somewhat lift the inaccessibility record in the moderate-income census tracts.

Branch and ATM Distribution by Geography Income Level Tampa-St. Petersburg MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	35	4.7	117,268	3.9	0	0.0	0	0.0
Moderate	206	27.8	771,839	25.9	1	6.7	1	6.7
Middle	263	35.5	1,061,981	35.6	9	60.0	9	60.0
Upper	213	28.7	998,739	33.5	5	33.3	5	33.3
NA	24	3.2	30,933	1.0	0	0.0	0	0.0
Total	741	100.0	2,980,760	100.0	15	100.0	15	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

The bank’s alternative delivery systems and product offerings demonstrate reasonable accessibility to essentially all portions of the AA. Bank OZK’s distribution of ATMs in LMI census tracts reflects the same distribution to that of the branches in the AA. However, refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals in the Tampa-St. Petersburg MSA AA. During the evaluation period, the bank opened one branch located in an upper-income census tract and closed three branches, two located in middle-income census tracts and one located in a census tract with no income designation. No branching changes occurred in LMI census tracts in the AA.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Tampa-St. Petersburg MSA AA. The Tampa-St. Petersburg MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the Tampa-St. Petersburg AA. As seen in the table for the State of Florida, the bank provided 244 CD services since the previous evaluation in the Tampa-St. Petersburg MSA AA. This represents 36.9 percent of the bank’s total relatively high level of CD services in the State of Florida, and the Tampa-St. Petersburg MSA AA contained 35.7 percent of the bank’s total branches in the State of Florida. A significant majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the six CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Tampa-St. Petersburg MSA AA:

- **Community Services** – Several employees led all day financial educational sessions for students of local school districts where the majority of students participate in the free and reduced lunch school program. The sessions covered items such as budgeting, savings, and balancing a check book. Thus, the activities benefit organizations that provide community services primarily to LMI individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area’s AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions from the limited-scope reviews contributed to the institution’s overall performance in the State of Florida.

Assessment Area	Lending Test	Investment Test	Service Test
Cape Coral MSA AA	Consistent	Consistent	Above
Fort Lauderdale MD AA	Consistent	Below	Consistent
Jacksonville MSA AA	Consistent	Consistent	Above
Miami MD AA	Consistent	Consistent	Consistent
Ocala MSA AA	Below	Below	Consistent
Punta Gorda MSA AA	Below	Below	Consistent

Facts and data supporting conclusions for the AAs follows, including a summary of the institution’s operations and activities, followed by geographic distribution and borrower profile tables by loan type. The appendices include demographic data for the limited-scope AAs.

Cape Coral MSA AA

The Cape Coral MSA AA consists of all census tracts in Lee County. The bank operates six branches in this AA with two located in moderate-income census tracts, three located in middle-income census tracts, and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is above the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	8	1,249
Home Mortgage Loans	14	2,622
Community Development Loans	4	27,970
Investments (New)	2	13,800
Investments (Prior Period)	1	9,333
Donations	8	77
CD Services	111	-
<i>Source: Bank Data</i>		

Fort Lauderdale MD AA

The Fort Lauderdale MD AA consists of all census tracts in Broward County. The bank operates one branch in this AA, located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	3	1,392
Home Mortgage Loans	10	4,742
Community Development Loans	3	230,485
Investments (New)	0	0
Investments (Prior Period)	2	516
Donations	8	41
CD Services	15	-
<i>Source: Bank Data</i>		

Jacksonville MSA AA

The Jacksonville MSA AA consists of all census tracts in Duval County. The bank operates three branches in this AA with one located in a moderate-income census tract and two located in upper-income census tracts. Three branches, one located in a moderate-income census tract and two located in upper-income census tracts, opened during the review period. In addition, one branch, located in an upper-income census tract closed during the review period. The branch distribution and availability of delivery systems is above the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	4	2,071
Home Mortgage Loans	7	546
Community Development Loans	1	10,780
Investments (New)	1	10,400
Investments (Prior Period)	1	1,724
Donations	15	77
CD Services	96	-
<i>Source: Bank Data</i>		

Miami MD AA

The Miami MD AA consists of all census tracts in Miami-Dade County. The bank operates five branches in this AA with one located in a moderate-income census tract, two located in middle-income census tracts, and two located in upper-income census tracts. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is above the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	16	2,707
Home Mortgage Loans	10	3,922
Community Development Loans	6	21,907
Investments (New)	5	42,615
Investments (Prior Period)	5	9,157
Donations	15	191
CD Services	33	-
<i>Source: Bank Data</i>		

Ocala MSA AA

The Ocala MSA AA consists of all census tracts in Marion County. The bank operates one branch in this AA, located in a middle-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	2	872
Home Mortgage Loans	10	856
Community Development Loans	0	0
Investments (New)	0	0
Investments (Prior Period)	1	47
Donations	3	15
CD Services	18	-
<i>Source: Bank Data</i>		

Punta Gorda MSA AA

The Punta Gorda MSA AA consists of all census tracts in Charlotte County. The bank operates three branches in this AA with two located in middle-income census tracts and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	25
Home Mortgage Loans	11	3,755
Community Development Loans	3	1,230
Investments (New)	0	0
Investments (Prior Period)	0	0
Donations	9	32
CD Services	55	-
<i>Source: Bank Data</i>		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cape Coral MSA	14	2,622	0.6	28,223	1	7.1	0.9	17.1	21.4	23.5	49.6	57.1	51.3	32.1	14.3	24.1	0.2	0	0.2
Fort Lauderdale MD	10	4,742	0.4	38,870	3.6	0	2.5	25.3	10	26.1	28.7	20	30.4	41.5	70	40.4	1	0	0.7
Jacksonville MSA	7	546	0.3	27,036	5.8	0	5.8	25.3	0	27.5	36.8	71.4	39.9	31.4	28.6	25	0.7	0	1.8
Miami MD	10	3,922	0.4	41,179	2	10	3	18.3	10	16.6	33.1	20	34.3	45.3	60	44.8	1.3	0	1.4
Ocala MSA	10	856	0.4	15,855	0.3	0	0.2	16.7	0	9.9	61.7	100	74.9	20.3	0	14.4	1.1	0	0.6
Punta Gorda MSA	11	3,755	0.5	8,915	0	0	0	14.8	0	11.9	67.2	81.8	66	18	18.2	22.1	0	0	0

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cape Coral MSA	8	1,249	0.4	28,640	2.3	0	1.7	24.1	37.5	22	44.5	62.5	47.9	28.5	0	28	0.6	0	0.4
Fort Lauderdale MD	3	1,392	0.2	114,528	2.4	0	2.8	27.1	33.3	26.4	29.3	66.7	28	40.3	0	41.5	1	0	1.2
Jacksonville MSA	4	2,071	0.2	27,526	7.2	25	6.2	27.1	25	23.6	36.4	25	36.3	26.6	25	31.4	2.8	0	2.6
Miami MD	16	2,707	0.8	170,992	2.2	6.3	2.3	19.5	31.3	18.6	27.3	12.5	29.6	47.8	37.5	45.8	3.3	12.5	3.8
Ocala MSA	2	872	0.1	9,219	1.6	0	1.2	21.5	50	19.9	55.8	50	57.1	20.6	0	20.9	0.5	0	0.9
Punta Gorda MSA	1	25	0.1	5,223	0	0	0	17.7	0	14.7	64.2	100	66	18.1	0	19.2	0	0	0

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral MSA	14	2,622	0.6	28,223	19.3	0	3.3	19	14.3	11.1	20.8	7.1	21.7	40.9	71.4	38.9	0	7.1	25
Fort Lauderdale MD	10	4,742	0.4	38,870	21.8	0	3.5	18.3	0	7.3	18.1	0	16.3	41.8	70	51.3	0	30	21.7
Jacksonville MSA	7	546	0.3	27,036	24.5	0	7.3	19.7	28.6	19.7	19.8	14.3	19.9	36.1	57.1	26.9	0	0	26.2
Miami MD	10	3,922	0.4	41,179	23.1	0	2.5	17.3	0	3.1	17.7	0	10.3	42	60	59.5	0	40	24.8
Ocala MSA	10	856	0.4	15,855	18	20	4.3	19.8	20	13.5	22.1	30	23.4	40.2	30	32.8	0	0	26
Punta Gorda MSA	11	3,755	0.5	8,915	16.7	9.1	2.7	20.4	9.1	9.3	22.8	9.1	18.1	40.1	72.7	44.5	0	0	25.4

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cape Coral MSA	8	1,249	1.3	28,640	93.3	62.5	53.8	1.7	37.5	5	0	
Fort Lauderdale MD	3	1,392	0.5	114,528	94.2	33.3	54.6	1.6	66.7	4.3	0	
Jacksonville MSA	4	2,071	0.7	27,526	92.2	50	51.7	2	50	5.8	0	
Miami MD	16	2,707	2.6	170,992	94.7	37.5	54	1.4	62.5	3.9	0	
Ocala MSA	2	872	0.3	9,219	92.8	100	53.3	1.7	0	5.6	0	
Punta Gorda MSA	1	25	0.2	5,223	93.6	0	57	1.5	100	4.9	0	

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

STATE OF GEORGIA

CRA RATING FOR GEORGIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN STATE OF GEORGIA

Bank OZK designated 11 AAs in the State of Georgia as noted in the table below.

Description of Assessment Areas State of Georgia			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Athens MSA AA	Clarke, Oconee	45	2
Atlanta-Marietta MSA AA	Barrow, Bartow, Carroll, Cherokee, Cobb, Coweta, Dawson, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Lumpkin, Paulding, Pickens, Rockdale, Walton	1,343	42
Brunswick MSA AA	Glynn	26	2
Columbus MSA AA	Muscogee	59	1
Dalton MSA AA	Murray, Whitfield	32	2
Gainesville MSA AA	Hall	50	1
Macon MSA AA	Bibb	48	3
GA Non-MSA AA	Decatur, Fannin, Gilmer, Gordon, Grady, Habersham, Jackson, Union	80	9
Rome MSA AA	Floyd	26	1
Savannah MSA AA	Chatham	88	1
Valdosta MSA AA	Lowndes	29	4
<i>Source: Bank Data; 2020 U.S. Census Data</i>			

SCOPE OF EVALUATION – STATE OF GEORGIA

For the Lending Test, examiners considered the following loans granted inside the bank’s State of Georgia AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 206 loans totaling \$38,007,000
- 2023: 218 loans totaling \$36,942,000
- 2024: 1,053 loans totaling \$308,526,000

Small Business Loans

- 2022: 155 loans totaling \$31,443,000
- 2023: 134 loans totaling \$31,189,000
- 2024: 234 loans totaling \$54,263,000

Consistent with the weighting described at the institution level, examiners placed more weight on home mortgage loans when arriving at applicable conclusions for the State of Georgia due to the volume of lending.

The following table shows that the Atlanta-Marietta MSA AA accounted for the largest volume of the bank’s loans, deposits, and branches in the State of Georgia. Consequently, examiners applied full-scope procedures and weighed performance in the Atlanta-Marietta MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the remaining AAs and generally weighed performance in each area consistent with the lending level reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Georgia						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Athens MSA AA	13,016	2.6	236,636	2.6	2	2.9
Atlanta-Marietta MSA AA	372,458	74.2	5,494,122	60.1	42	61.8
Brunswick MSA AA	4,869	1.0	167,177	1.8	2	2.9
Columbus MSA AA	6,528	1.3	99,374	1.1	1	1.5
Dalton MSA AA	9,033	1.8	402,152	4.4	2	2.9
Gainesville MSA AA	13,037	2.6	172,641	1.9	1	1.5
Macon MSA AA	7,119	1.4	267,001	2.9	3	4.4
GA Non-MSA AA	45,278	9.0	1,517,665	16.6	9	13.2
Rome MSA AA	3,374	0.7	363,381	4.0	1	1.5
Savannah MSA AA	13,412	2.7	173,000	1.9	1	1.5
Valdosta MSA AA	13,599	2.7	242,358	2.7	4	5.9
Total	501,723	100.0	9,135,507	100.0	68	100.0

*Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.*

For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF GEORGIA

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the State of Georgia regarding the Lending Test. A leader level of CD loans and an excellent level of lending activity lift adequate geographic distribution and borrower profile performances to support this conclusion. The Atlanta-Marietta MSA AA, Brunswick MSA AA, Dalton MSA AA, Savannah MSA AA, and Valdosta MSA AA demonstrated consistent performance, while the Athens MSA AA, Columbus MSA AA, Gainesville MSA AA, Macon MSA AA, GA Non-MSA AA, and Rome MSA AA demonstrated inconsistent performance below the rated area's record.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the State of Georgia. Excellent performance regarding home mortgage loans outweighs good performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Georgia. For 2024, the bank originated 1,053 reportable home mortgage loans totaling approximately \$308.5 million in the State of Georgia AAs. Bank OZK captured 0.5 percent market share of the total number of home mortgage loans and 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 42nd of 940 total lenders in the bank's State of Georgia AAs. This ranking lands the bank in the top 5.0 percent of lenders reporting such loans, at 4.5 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the State of Georgia. For 2023, the bank originated 134 reportable small business loans totaling approximately \$31.2 million in the State of Georgia AAs. Bank OZK captured 0.1 percent market share of the total number of small business loans and 0.5 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 49th of 255 total lenders in the bank's State of Georgia AAs. This ranking lands the bank in the top 20.0 percent of lenders reporting such loans, at 19.2 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AAs in the State of Georgia. The Athens MSA AA, Atlanta-Marietta MSA AA, Brunswick MSA AA, Columbus MSA AA, Dalton MSA AA, Gainesville MSA AA, Macon MSA AA, GA Non-MSA AA, Savannah MSA AA, and Valdosta MSA AA demonstrated consistent performance, while performance in the Rome MSA AA falls below the rated area's record.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the State of Georgia. The Atlanta-Marietta MSA AA, Brunswick MSA AA, Columbus MSA AA, Dalton MSA AA, GA Non-MSA AA, Rome MSA AA, Savannah MSA AA, and Valdosta MSA AA demonstrated consistent performance, while the Athens MSA AA, Gainesville MSA AA, and Macon MSA AA fall below the rated area’s record.

Community Development Loans

The institution is a leader in making CD loans in the State of Georgia. The Atlanta-Marietta MSA AA, Brunswick MSA AA, Dalton MSA AA, Savannah MSA AA, and Valdosta MSA AA demonstrated consistent performance, while the Athens MSA AA, Columbus MSA AA, Gainesville MSA AA, Macon MSA AA, GA Non-MSA AA, and Rome MSA AA performance falls below the rated area.

The following table shows that since the previous evaluation, the bank granted 58 CD loans totaling approximately \$665.9 million in the State of Georgia. The dollar amount equates to 37.7 percent of the bank’s overall leader level of CD loans. As noted, the State of Georgia contributed 32.8 percent of reported loans. The current level reflects a decrease in the number but an increase in the dollar volume from the 109 CD loans totaling \$414.1 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area State of Georgia										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Athens MSA AA	0	0	0	0	1	2,063	0	0	1	2,063
Atlanta-Marietta MSA AA	14	130,539	5	1,850	12	31,019	8	224,117	39	387,525
Brunswick MSA AA	1	12,750	0	0	0	0	2	19,751	3	32,501
Columbus MSA AA	0	0	0	0	0	0	0	0	0	0
Dalton MSA AA	3	32,373	0	0	0	0	0	0	3	32,373
Gainesville MSA AA	0	0	0	0	1	8,250	0	0	1	8,250
Macon MSA AA	0	0	2	100	1	1,769	0	0	3	1,869
GA Non-MSA AA	1	13,400	0	0	0	0	0	0	1	13,400
Rome MSA AA	0	0	0	0	0	0	0	0	0	0
Savannah MSA AA	1	47,500	0	0	3	112,141	0	0	4	159,641
Valdosta MSA AA	3	28,250	0	0	0	0	0	0	3	28,250
Total	23	264,812	7	1,950	18	155,242	10	243,868	58	665,872

Source: Bank Data

The CD loans reflect good responsiveness to the state’s CD needs. Although the bank’s CD loans primarily supported affordable housing and revitalization or stabilization efforts, they also demonstrated responsiveness to the identified needs of community service and economic development efforts.

INVESTMENT TEST

Bank OZK demonstrated a high satisfactory record in the State of Georgia regarding the Investment Test. A significant level of QIs coupled with excellent responsiveness to CD needs coupled and the extensive use of innovative and/or complex investments support this conclusion. The Athens MSA AA, Atlanta-Marietta MSA AA, GA Non-MSA AA, and Valdosta MSA AA demonstrated consistent performance. Performance in the Brunswick MSA AA, Columbus MSA AA, and Savannah MSA AA demonstrated inconsistent performance, rising above the rated area while performance in the Dalton MSA AA, Gainesville MSA AA, Macon MSA AA, and Rome MSA AA falls below the rated area level.

Investment and Grant Activity

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors in the State of Georgia. The following table shows that Bank OZK made 185 QIs totaling approximately \$165.0 million in the State of Georgia. By dollar volume, this equates to 17.3 percent of the bank's overall excellent level of QIs. As noted, the State of Georgia contributed 27.7 percent of the bank's total deposits. The current level reflects an increase from the 90 QIs totaling \$79.3 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area State of Georgia										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Athens MSA AA	2	3,010	0	0	5	1,450	0	0	7	4,460
Atlanta-Marietta MSA AA	32	75,925	51	1,339	13	126	0	0	96	77,390
Brunswick MSA AA	2	13,206	2	3	0	0	0	0	4	13,209
Columbus MSA AA	4	9,828	0	0	0	0	0	0	4	9,828
Dalton MSA AA	2	3,002	8	8	0	0	0	0	10	3,010
Gainesville MSA AA	2	186	2	4	0	0	0	0	4	190
Macon MSA AA	3	6	5	3	0	0	0	0	8	9
GA Non-MSA AA	4	22,636	8	508	1	5	0	0	13	23,149
Rome MSA AA	1	2	0	0	0	0	0	0	1	2
Savannah MSA AA	13	18,736	1	250	5	25	1	5	20	19,016
Valdosta MSA AA	2	5,074	10	13	0	0	2	10	14	5,097
Statewide Activities	4	9,658	0	0	0	0	0	0	4	9,658
Total	71	161,269	87	2,128	24	1,606	3	15	185	165,018

Source: Bank Data

The following lists an example of a QI in the broader statewide area:

- **Affordable Housing** – The bank invested \$9.7 million in MBSs with LMI borrowers located outside of the bank's AAs but in the State of Georgia.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the State of Georgia. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need in the rated area. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution makes extensive use of innovative and/or complex investments to support CD initiatives in the State of Georgia. The bank has approximately \$136.9 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$99.9 million in LIHTCs within the State of Georgia.

SERVICE TEST

Bank OZK demonstrated a high satisfactory record in the State of Georgia regarding the Service Test. The readily accessible delivery systems and relatively high level of CD services lift the bank's records regarding changes in branch locations that have generally not adversely affected the accessibility of its delivery systems and services that do not vary in a way that inconveniences portions of the AAs to support this conclusion. The Athens MSA AA, Atlanta-Marietta MSA AA, Brunswick MSA AA, Gainesville MSA AA, and Rome MSA AA demonstrated consistent performance. The Dalton MSA AA, Savannah MSA AA, and Valdosta MSA AA demonstrated inconsistent performance above the rated area's record, while the Columbus MSA AA, GA Non-MSA AA, and Macon MSA AA demonstrated inconsistent performance below the rated area's record.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the institution's AAs in the State of Georgia. The readily accessible branch distribution and accessibility of alternative delivery systems support this conclusion. This performance reflects inconsistent conclusions that is above that of the institution's Accessibility of Delivery Systems.

Bank OZK's branch distribution is readily accessible to all portions of the AAs in the State of Georgia. As reflected in the following table, the distribution of Bank OZK's branches in low-income census tracts reflects a level slightly below the percentage of population by 1.5 percentage points, reflecting reasonable accessibility. The table further shows that Bank OZK's branch distribution in moderate-income census tracts reflects a level above the percentage of population by 18.2 percentage points, reflecting a readily accessible level. The performance level in the moderate-income census tracts outweighs that of the low-income census tracts to support the overall conclusion.

Branch and ATM Distribution by Geography Income Level State of Georgia								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	130	7.1	428,246	5.9	3	4.4	3	3.9
Moderate	395	21.6	1,544,969	21.5	27	39.7	29	38.2
Middle	614	33.6	2,589,395	36.0	19	27.9	24	31.6
Upper	622	34.1	2,481,604	34.5	16	23.5	17	22.4
NA	65	3.6	158,115	2.2	3	4.4	3	3.9
Total	1,826	100.0	7,202,329	100.0	68	100.0	76	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

The bank’s alternative delivery systems are readily accessible to all portions of the bank’s AAs in the State of Georgia. Bank OZK’s distribution of ATMs in LMI census tracts remains similar to that of the branches noted previously. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the State of Georgia. During the evaluation period, the bank closed one branch in a moderate-income census tract. Additionally, two branch openings occurred in a middle-income census tract and a tract with no income designation in the State of Georgia.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals in the State of Georgia. The State of Georgia reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the State of Georgia. As seen in the following table, Bank OZK provided 886 CD services since the previous evaluation in this rated area. This represents 34.8 percent of the bank’s total relatively high level of CD services, and the State of Georgia contained 28.3 percent of the bank’s total branches. A substantial majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 270 CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area State of Georgia					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Athens MSA AA	0	21	2	0	23
Atlanta-Marietta MSA AA	16	496	22	0	534
Brunswick MSA AA	0	21	0	1	22
Columbus MSA AA	1	13	0	0	14
Dalton MSA AA	3	44	0	0	47
Gainesville MSA AA	0	13	0	0	13
Macon MSA AA	1	30	3	0	34
GA Non-MSA AA	4	74	0	0	78
Rome MSA AA	0	4	2	0	6
Savannah MSA AA	0	16	6	0	22
Valdosta MSA AA	2	78	2	11	93
Total	27	810	37	12	886
<i>Source: Bank Data</i>					

ATLANTA-MARIETTA MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ATLANTA-MARIETTA MSA AA

Bank OZK designated all 1,343 census tracts that make up Barrow, Bartow, Carroll, Cherokee, Cobb, Coweta, Dawson, DeKalb, Douglas, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Lumpkin, Paulding, Pickens, Rockdale, and Walton Counties, 20 of the 29 counties that make up the Atlanta-Sandy Springs-Roswell-Marietta, GA MSA, located in northcentral Georgia.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 87 low-, 288 moderate-, 448 middle-, 472 upper-income census tracts, and 48 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area						
Atlanta-Marietta MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,343	6.5	21.4	33.4	35.2	3.6
Population by Geography	5,408,604	5.4	21.6	35.2	35.5	2.3
Housing Units by Geography	2,079,829	6.2	21.9	34.1	35.2	2.7
Owner-Occupied Units by Geography	1,234,708	2.6	16.6	37.4	42.2	1.3
Occupied Rental Units by Geography	686,839	11.4	30.4	29.4	23.9	4.8
Vacant Units by Geography	158,282	11.4	26.2	29.3	29.1	4.1
Businesses by Geography	732,692	5.5	20.0	30.7	40.4	3.4
Farms by Geography	4,174	2.4	15.6	39.3	40.7	2.0
Family Distribution by Income Level	1,280,619	20.8	16.6	19.5	43.2	0.0
Household Distribution by Income Level	1,921,547	22.8	15.9	17.9	43.3	0.0
Median Family Income MD - 12054 Atlanta-Sandy Springs-Roswell, GA MD		\$81,951	Median Housing Value			\$262,126
Median Family Income MD - 31924 Marietta, GA MD		\$91,140	Median Gross Rent			\$1,237
			Families Below Poverty Level			8.0%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on January 12, 2023, for Henry County due to severe storms, straight-line winds, and tornadoes. FEMA also issued disaster declarations for Dawson County on September 30, 2024, due to Hurricane Helene.

According to Moody's Analytics, major employers in the area consist of Delta Air Lines, Emory University & Emory Healthcare, Piedmont Healthcare, Northside Hospital, and The Home Depot Inc. The following table lists annual unemployment rates over the evaluation period for the AA, State of Georgia, and nationwide.

Unemployment Rates Atlanta-Marietta MSA AA			
Area	2022	2023	2024
	%	%	%
Barrow County	2.6	2.7	3.0
Bartow County	2.9	3.1	3.3
Carroll County	3.0	3.2	3.4
Cherokee County	2.5	2.7	2.9
Cobb County	2.8	3.1	3.2
Coweta County	2.8	3.0	3.1
Dawson County	2.5	2.6	2.8
Dekalb County	3.3	3.5	3.7
Douglas County	3.4	3.6	3.8
Forsyth County	2.3	2.5	2.8
Fulton County	3.2	3.4	3.6
Gwinnett County	2.8	3.0	3.2
Haralson County	2.9	3.1	3.2
Heard County	3.4	3.4	3.6
Henry County	3.2	3.5	3.8
Lumpkin County	3.0	3.1	3.4
Paulding County	2.9	3.1	3.3
Pickens County	2.6	2.8	2.9
Rockdale County	3.6	3.8	4.2
Walton County	2.9	3.0	3.2
State of Georgia	3.2	3.3	3.5
National Average	3.6	3.6	4.1

Source: Bureau of Labor Statistics

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 968 offices from its 75 institutions serving about 5,587 people on average. Bank OZK ranked 9th in deposit market share by capturing 2.3 percent of the area’s deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local development authority that focuses on commerce, trade, and job creation in the AA. The contact stated that the economic conditions are good and that all industries have rebounded since the pandemic. Additionally, the contact noted that the current challenges to the area are elevated mortgage interest rates and home prices which are dissuading developers in engaging in building affordable housing. The contact indicated that affordable housing, small business credit, and financial literacy are primary needs within the area, specifically as they relate to minority and women-owned businesses. Overall, the contact indicated that access to financial services is adequate, and the entity routinely works with financial institutions to help assist the community.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area's primary credit needs include residential and small business loans. With respect to the area's CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ATLANTA-MARIETTA MSA AA

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the Atlanta-Marietta MSA AA regarding the Lending Test. A leader level of CD loans and an excellent level of lending activity lift adequate geographic distribution and borrower profile performances to support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Atlanta-Marietta MSA AA. Excellent performance regarding home mortgage loans outweighs good performance regarding small business loans to support this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Atlanta-Marietta MSA AA. For 2024, the bank originated 744 reportable home mortgage loans totaling approximately \$238.1 million inside the AA. Bank OZK captured 0.5 percent market share of the total number of home mortgage loans and 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 50th of 855 total lenders in the AA and ranks the bank in the top 10.0 percent of lenders reporting such loans, at 5.8 percent.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the Atlanta-Marietta MSA AA. For 2023, the bank originated 96 reportable small business loans totaling approximately \$23.2 million inside the AA. Bank OZK captured 0.05 percent market share of the total number of small business loans and 0.4 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 60th of 241 total lenders in the AA and ranks the bank in the top quarter of lenders reporting such loans, at 24.9 percent.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Atlanta-Marietta MSA AA. Adequate performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Atlanta-Marietta MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank’s level of lending in low-income census tracts falls 1.9 percentage points below aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank’s level of lending falls 1.9 percentage points below aggregate data, reflective of adequate performance.

Geographic Distribution of Home Mortgage Loans Atlanta-Marietta MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.6	3.1	9	1.2	1,574	0.7
Moderate	16.6	19.1	128	17.2	25,629	10.8
Middle	37.4	39.2	286	38.4	61,139	25.7
Upper	42.2	37.2	315	42.3	146,069	61.3
NA	1.3	1.5	6	0.8	3,733	1.6
Total	100.0	100.0	744	100.0	238,144	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Atlanta-Marietta MSA AA. Adequate performance in both LMI geographies supports this conclusion. As seen in the following table, the bank’s level of lending in low-income census tracts falls 1.7 percentage points below aggregate data, reflective of adequate performance. The table also shows in moderate-income census tracts the bank’s level of lending rises 3.7 percentage points above aggregate data, also reflective of adequate performance. Further, the table shows in both LMI geographies, the bank’s levels fall within adequate ranges of available D&B data.

Geographic Distribution of Small Business Loans Atlanta-Marietta MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.0	3.8	2	2.1	705	3.0
Moderate	21.3	19.2	22	22.9	5,646	24.3
Middle	30.4	31.2	37	38.5	8,073	34.8
Upper	40.5	43.2	32	33.3	7,939	34.2
NA	2.8	2.5	3	3.1	850	3.7
Total	100.0	100.0	96	100.0	23,213	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Atlanta-Marietta MSA AA. Adequate performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Atlanta-Marietta MSA AA. Adequate performance to both LMI borrowers supports this conclusion. As seen in the following table, the bank's level of lending to low-income borrowers falls 1.8 percentage points below aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank's level of lending falls 5.8 percentage points below aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Atlanta-Marietta MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.8	6.1	32	4.3	1,573	0.7
Moderate	16.6	15.3	71	9.5	4,956	2.1
Middle	19.5	20.4	85	11.4	9,020	3.8
Upper	43.2	35.8	177	23.8	33,962	14.3
Income Not Available	0.0	22.4	379	50.9	188,633	79.2
Total	100.0	100.0	744	100.0	238,144	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The distribution of borrowers reflects adequate penetration among business customers of different sizes in the Atlanta-Marietta MSA AA. Adequate performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank’s level of lending to businesses with gross annual revenues of \$1 million or less trails D&B data but rises 7.7 percentage points above the aggregate data, reflecting adequate performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Atlanta-Marietta MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	94.1	50.6	56	58.3	11,243	48.4
> \$1,000,000	1.8	--	37	38.5	11,189	48.2
Revenue Not Available	4.1	--	3	3.1	781	3.4
Total	100.0	100.0	96	100.0	23,213	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.</i>						

Community Development Loans

The institution is a leader in making CD loans in the Atlanta-Marietta MSA AA. As noted under the rated area level, the bank originated 39 CD loans totaling approximately \$387.5 million in the Atlanta-Marietta MSA AA. The dollar amount equates to 58.2 percent of the bank’s overall leader level of CD loans in the State of Georgia. As noted, the Atlanta-Marietta MSA AA contributed 74.2 percent of reported loans for the State of Georgia. The current level reflects a decrease in the number but an increase in the dollar volume of 71 CD loans totaling \$305.3 million in this AA at the prior evaluation.

In addition, the CD loans reflect good responsiveness to the AA’s CD needs. The bank’s CD loans primarily supported revitalization or stabilization efforts and also demonstrated responsiveness to identified needs of affordable housing, community service, and economic development efforts.

The following lists an example of a CD loan within the Atlanta-Marietta MSA AA:

- ***Affordable Housing*** – The bank originated an \$18.5 million loan to finance the rehabilitation of a 240-unit housing complex serving elderly individuals. The rents for these units are restricted to LMI individuals. Additionally, the housing complex is located in a low-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated a high satisfactory record in the Atlanta-Marietta MSA AA regarding the Investment Test. A significant level of QIs coupled with excellent responsiveness and extensive use of innovative and/or complex investments support this conclusion.

Investment and Grant Activity

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors in the Atlanta-Marietta MSA AA. As noted in the rated area level, the bank made 96 QIs totaling approximately \$77.4 million in the Atlanta-Marietta MSA AA. The dollar amount equates to 46.9 percent of the bank's overall significant level of QIs in the State of Georgia. As noted, the Atlanta-Marietta MSA AA accounted for 60.1 percent of the bank's deposits for the State of Georgia. The current level reflects an increase from the 55 QIs totaling approximately \$49.0 million in this AA at the prior evaluation.

The following lists an example of a QI in the Atlanta-Marietta MSA AA:

- ***Affordable Housing*** – The bank invested over \$41.7 million in LIHTCs to support the rehabilitation of affordable housing projects serving LMI individuals/families in the AA. These projects will support the rehabilitation of 378 affordable housing units in the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Atlanta-Marietta MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank's Atlanta-Marietta MSA AA.

Community Development Initiatives

The institution makes extensive use of innovative and/or complex investments to support CD initiatives in the Atlanta-Marietta MSA AA. The bank has approximately \$64.2 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$41.7 million in LIHTCs within the Atlanta-Marietta MSA AA.

SERVICE TEST

Bank OZK demonstrated a high satisfactory record in the Atlanta-Marietta MSA AA regarding the Service Test. The readily accessible delivery systems and relatively high level of CD services lift the opening and closing of branches that have generally not adversely affected the accessibility of delivery systems and services that do not vary in a way that inconveniences portions of the AA to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are readily accessible to all portions of the Atlanta-Marietta MSA AA. The readily accessible branch distribution and accessibility of alternative delivery systems support this conclusion.

Bank OZK’s branch distribution is readily accessible to all portions of the Atlanta-Marietta MSA AA. As reflected in the table below, the distribution of branches in low-income census tracts reflects a level slightly below the percentage of population by 0.6 percentage points, reflecting reasonable accessibility. The table further shows that in moderate-income census tracts the bank’s level rises above the percentage of population by 16.5 percentage points, reflecting a readily accessible level. The performance level in the moderate-income census tracts outweighs that of the low-income census tracts to support this conclusion.

Branch and ATM Distribution by Geography Income Level Atlanta-Marietta MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	87	6.5	291,434	5.4	2	4.8	2	4.2
Moderate	288	21.4	1,169,402	21.6	16	38.1	17	35.4
Middle	448	33.4	1,904,318	35.2	13	31.0	18	37.5
Upper	472	35.1	1,918,243	35.5	9	21.4	2	4.2
NA	48	3.6	125,207	2.3	2	4.8	9	18.8
Total	1,343	100.0	5,408,604	100.0	42	100.0	48	100.0

*Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0.*

The bank’s alternative delivery systems are readily accessible to all portions of the bank’s AA. Bank OZK’s distribution of ATMs in LMI census tracts remains similar to that of the branches noted previously. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals in the Atlanta-Marietta MSA AA. During the evaluation period, the bank opened one branch in a middle-income census tract and another branch in a census tract with no income designation. No branching changes occurred in LMI census tracts in the AA.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconvenience portions of the AA, particularly LMI geographies and/or individuals in the Atlanta-Marietta MSA AA. The Atlanta-Marietta MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the Atlanta-Marietta MSA AA. As seen in the table for the State of Georgia, the bank provided 534 CD services since the previous evaluation in the Atlanta-Marietta MSA AA. This represents 60.3 percent of the bank’s total relatively high level of CD services in the State of Georgia, and the Atlanta-Marietta MSA AA contained 61.8 percent of the bank’s total branches in the State of Georgia. A significant majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 141 CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Atlanta-Marietta MSA AA:

- **Community Services** – Several employees led all day financial educational sessions for students of local school districts where the majority of students participate in the free and reduced school lunch program. The sessions covered topics such as how to create a business, how to run a business, and business budgeting. Thus, the activities benefit organizations that provide community services primarily to LMI individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area’s AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions from the limited-scope reviews contributed to the institution’s overall performance in the State of Georgia.

Assessment Area	Lending Test	Investment Test	Service Test
Athens MSA AA	Below	Consistent	Consistent
Brunswick MSA AA	Consistent	Above	Consistent
Columbus MSA AA	Below	Above	Below
Dalton MSA AA	Consistent	Below	Above
Gainesville MSA AA	Below	Below	Consistent
Macon MSA AA	Below	Below	Below
GA Non-MSA AA	Below	Consistent	Below
Rome MSA AA	Below	Below	Consistent
Savannah MSA AA	Consistent	Above	Above
Valdosta MSA AA	Consistent	Consistent	Above

Facts and data supporting conclusions for the AAs follows, including a summary of the institution’s operations and activities, followed by geographic distribution and borrower profile tables by loan type. The appendices include demographic data for the limited-scope AAs.

Athens MSA AA

The Athens MSA AA consists of all census tracts in Clarke and Oconee Counties. The bank operates two branches in this AA with one located in a moderate-income census tract and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	5	841
Home Mortgage Loans	21	5,922
Community Development Loans	1	2,063
Investments (New)	2	4,410
Investments (Prior Period)	0	0
Donations	5	50
CD Services	23	-
<i>Source: Bank Data</i>		

Brunswick MSA AA

The Brunswick MSA AA consists of all census tracts in Glynn County. The bank operates two branches in this AA with one located in a moderate-income census tract and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	0	0
Home Mortgage Loans	10	4,270
Community Development Loans	3	32,501
Investments (New)	1	8,618
Investments (Prior Period)	1	4,589
Donations	2	2
CD Services	22	-
<i>Source: Bank Data</i>		

Columbus MSA AA

The Columbus MSA AA consists of all census tracts in Muscogee County. The bank operates one branch in this AA located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	908
Home Mortgage Loans	6	5,352
Community Development Loans	0	0
Investments (New)	1	3,000
Investments (Prior Period)	1	6,818
Donations	2	10
CD Services	14	-
<i>Source: Bank Data</i>		

Dalton MSA AA

The Dalton MSA AA consists of all census tracts in Murray and Whitfield Counties. The bank operates two branches in this AA with one located in a moderate-income census tract and one located in a middle-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	6	2,091
Home Mortgage Loans	18	2,542
Community Development Loans	3	32,373
Investments (New)	1	3,000
Investments (Prior Period)	0	0
Donations	9	10
CD Services	47	-
<i>Source: Bank Data</i>		

Gainesville MSA AA

The Gainesville MSA AA consists of all census tracts in Hall County. The bank operates one branch in this AA located in a moderate-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	4	1,204
Home Mortgage Loans	27	8,517
Community Development Loans	1	8,250
Investments (New)	0	0
Investments (Prior Period)	2	186
Donations	2	4
CD Services	13	-
<i>Source: Bank Data</i>		

Macon MSA AA

The Macon MSA AA consists of all census tracts in Bibb County. The bank operates three branches in this AA with two located in upper-income census tracts and one located in a census tract with no income designation. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	5
Home Mortgage Loans	39	4,105
Community Development Loans	3	1,869
Investments (New)	0	0
Investments (Prior Period)	0	0
Donations	8	9
CD Services	34	-
<i>Source: Bank Data</i>		

GA Non-MSA AA

The GA Non-MSA AA consists of all census tracts in Decatur, Fannin, Gilmer, Gordon, Grady, Habersham, Jackson, and Union Counties. The bank operates nine branches in this AA with three located in moderate-income census tracts, four located in middle-income census tracts, and two located in upper-income census tracts. One branch, located in a moderate-income census tract, closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	14	1,801
Home Mortgage Loans	115	23,942
Community Development Loans	1	13,400
Investments (New)	2	19,601
Investments (Prior Period)	1	3,030
Donations	10	518
CD Services	78	-
<i>Source: Bank Data</i>		

Rome MSA AA

The Rome MSA AA consists of all census tracts in Floyd County. The bank operates one branch in this AA located in a moderate-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	222
Home Mortgage Loans	14	1,954
Community Development Loans	0	0
Investments (New)	0	0
Investments (Prior Period)	0	0
Donations	1	2
CD Services	6	-
<i>Source: Bank Data</i>		

Savannah MSA AA

The Savannah MSA AA consists of all census tracts in Chatham County. The bank operates one branch in this AA located in a moderate-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	350
Home Mortgage Loans	31	11,122
Community Development Loans	4	159,641
Investments (New)	2	16,271
Investments (Prior Period)	6	2,675
Donations	12	70
CD Services	22	-
<i>Source: Bank Data</i>		

Valdosta MSA AA

The Valdosta MSA AA consists of all census tracts in Lowndes County. The bank operates four branches in this AA with one located in a low-income census tract, two located in moderate-income census tracts, and one located in a middle-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	5	554
Home Mortgage Loans	28	2,656
Community Development Loans	3	28,250
Investments (New)	1	5,000
Investments (Prior Period)	1	74
Donations	12	23
CD Services	93	-
<i>Source: Bank Data</i>		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Athens MSA	21	5,922	0.9	3,364	6.2	0	6.1	14.3	9.5	14.1	24.5	23.8	25.8	54.9	66.7	53.9	0	0	0.1
Brunswick MSA	10	4,270	0.4	2,165	1.6	0	1.4	22.1	20	17	38.2	40	37.4	36.5	30	41.5	1.7	10	2.8
Columbus MSA	6	5,352	0.3	4,024	4	16.7	2.7	23.7	0	19.3	32.2	0	31.5	40	83.3	46.3	0.2	0	0.2
Dalton MSA	18	2,542	0.8	2,655	0	0	0	13.6	5.6	14.4	71.6	66.7	69.6	14.8	27.8	16	0	0	0
Gainesville MSA	27	8,517	1.2	5,348	2	0	1.2	9.3	7.4	8.5	52.2	51.9	51.8	33.7	40.7	36.3	2.7	0	2.3
Macon MSA	39	4,105	1.7	3,155	13.7	7.7	13	14.3	23.1	11.5	26	15.4	27.2	44	46.2	46.9	2.1	7.7	1.5
GA Non-MSA	115	23,942	4.9	10,861	0	0	0	6.5	1.7	5.4	50.6	56.5	42.4	42	40.9	51.2	0.9	0.9	1.1
Rome MSA	14	1,954	0.6	2,264	0	0	0	18.6	0	24.8	39.9	35.7	37.3	39.1	64.3	35.2	2.4	0	2.7
Savannah MSA	31	11,122	1.3	7,984	5.7	9.7	6.1	24.9	16.1	21	34.5	32.3	39.4	33.4	41.9	29.6	1.6	0	3.9
Valdosta MSA	28	2,656	1.2	3,038	7.5	0	3.2	14.1	21.4	15.8	32.7	21.4	35.8	44.7	57.1	44.9	1	0	0.3

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Athens MSA	5	841	0.3	3,991	8.1	0	6.1	16.1	20	17.3	20.3	0	19.2	55.5	80	57.5	0	0	0
Brunswick MSA	0	0	0	2,149	7.7	0	4.9	30.2	0	28.3	26.6	0	26.5	32.2	0	36.6	3.3	0	3.6
Columbus MSA	1	908	0.1	3,241	8.1	0	5.9	22.4	0	18.5	28	0	24.1	40.6	100	50.2	1	0	1.3
Dalton MSA	6	2,091	0.3	1,915	0	0	0	32.5	33.3	29.5	51.8	66.7	55.8	15.7	0	14.7	0	0	0
Gainesville MSA	4	1,204	0.2	5,583	9.2	0	8.5	12.3	0	10.4	49.4	75	52.8	25.7	25	26	3.4	0	2.4
Macon MSA	1	5	0.1	3,050	13.4	0	10.4	20.6	100	16.4	19.2	0	18.5	37.7	0	44.4	9.1	0	10.4
GA Non-MSA	14	1,801	0.7	6,913	0	0	0	9.5	7.1	7.8	48.4	57.1	46.5	41.6	35.7	44.6	0.6	0	1.1
Rome MSA	1	222	0.1	1,546	0	0	0	43.9	0	36.9	28.2	100	32.2	26.7	0	29.3	1.2	0	1.6
Savannah MSA	1	350	0.1	8,125	12.1	0	11	31.6	0	27.6	30.1	100	33.3	23.7	0	25.5	2.6	0	2.6
Valdosta MSA	5	554	0.3	2,140	14.6	100	14.2	24.8	0	23.3	19.8	0	22.4	40.1	0	39.5	0.8	0	0.6

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Athens MSA	21	5,922	0.9	3,364	23.3	0	4.5	15.8	0	11.8	15.2	4.8	16.1	45.7	57.1	47.2	0	38.1	20.4
Brunswick MSA	10	4,270	0.4	2,165	23.8	10	3.7	14.6	0	8.6	17.7	30	17	43.9	10	48.2	0	50	22.5
Columbus MSA	6	5,352	0.3	4,024	25.1	0	3.7	15.7	0	9.4	17.4	0	16.8	41.8	0	38.3	0	100	31.9
Dalton MSA	18	2,542	0.8	2,655	18.5	5.6	5.8	20	16.7	20.9	22	22.2	24.1	39.5	27.8	29.9	0	27.8	19.3
Gainesville MSA	27	8,517	1.2	5,348	20.3	0	4.4	18.5	0	13.4	20.1	14.8	21.8	41	29.6	39.5	0	55.6	21
Macon MSA	39	4,105	1.7	3,155	28.9	2.6	7.4	15.9	0	15	17	2.6	20.3	38.2	10.3	29.5	0	84.6	27.9
GA Non-MSA	115	23,942	4.9	10,861	17.1	1.7	2.7	16	6.1	7.1	18.7	12.2	16.5	48.1	45.2	51.3	0	34.8	22.6
Rome MSA	14	1,954	0.6	2,264	23.4	0	5.1	16.4	14.3	15.3	20	14.3	21.9	40.2	42.9	33.6	0	28.6	24.2
Savannah MSA	31	11,122	1.3	7,984	24.3	0	5.1	18.3	9.7	13.5	18.4	6.5	19.7	39	9.7	38.2	0	74.2	23.6
Valdosta MSA	28	2,656	1.2	3,038	24.1	0	4.6	14.9	10.7	10.2	18.1	10.7	19.9	42.9	35.7	36.1	0	42.9	29.2

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Athens MSA	5	841	0.8	3,991	90.1	80	48.5	2.3	20	7.6	0
Brunswick MSA	0	0	0	2,149	91.1	0	49	2.4	0	6.5	0
Columbus MSA	1	908	0.2	3,241	90.6	100	47.9	2.5	0	7	0
Dalton MSA	6	2,091	1	1,915	86.2	66.7	48.3	4.3	16.7	9.5	16.7
Gainesville MSA	4	1,204	0.7	5,583	91.9	75	49	2.9	25	5.3	0
Macon MSA	1	5	0.2	3,050	89.8	100	51	2.6	0	7.5	0
GA Non-MSA	14	1,801	2.3	6,913	91.6	71.4	50.7	2.1	14.3	6.4	14.3
Rome MSA	1	222	0.2	1,546	88.9	100	54.9	2.7	0	8.3	0
Savannah MSA	1	350	0.2	8,125	91.1	100	50.3	2.4	0	6.5	0
Valdosta MSA	5	554	0.8	2,140	89.4	0	50.5	2.8	100	7.9	0

*Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.*

STATE OF NORTH CAROLINA

CRA RATING FOR NORTH CAROLINA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF NORTH CAROLINA

Bank OZK designated seven AAs in the State of North Carolina as noted in the table below. The Asheville MSA AA and Burlington MSA AA reflect new AAs since the previous evaluation. Examiners did not assess the bank's lending performance in the new areas or provide separate conclusions due to the timing of the branch openings within the AAs on May 29, 2025, and April 30, 2025. Any qualified CD activity in these AAs are reflected under statewide activity for the State of North Carolina as a whole.

Description Assessment Areas State of North Carolina			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Asheville MSA AA	Buncombe	65	1
Burlington MSA AA	Alamance	37	1
Charlotte MSA AA	Cabarrus, Gaston, Lincoln, Mecklenburg, Rowan	486	9
Greensboro MSA AA	Randolph	34	1
NC Non-MSA AA	Cleveland, Rutherford	46	8
Wilmington MSA AA	New Hanover	55	1
Winston-Salem MSA AA	Davidson, Davie, Forsyth	147	4

Source: Bank Data; 2020 U.S. Census Data

SCOPE OF EVALUATION – STATE OF NORTH CAROLINA

For the Lending Test, examiners considered the following loans granted inside the bank's State of North Carolina AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 162 loans totaling \$53,533,000
- 2023: 98 loans totaling \$21,542,000
- 2024: 146 loans totaling \$76,869,000

Small Business Loans

- 2022: 96 loans totaling \$16,992,000
- 2023: 75 loans totaling \$14,641,000
- 2024: 87 loans totaling \$14,316,000

Consistent with the weighting described at the institution level, examiners placed more weight on home mortgage loans when arriving at applicable conclusions for the State of North Carolina due to the volume of lending.

The following table shows that the Charlotte MSA AA accounted for the largest volume of the bank’s loans, deposits, and branches in the State of North Carolina. Consequently, examiners applied full-scope procedures and weighed performance in the Charlotte MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the remaining AAs and generally weighed performance in each area consistent with the lending level reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of North Carolina						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Charlotte MSA AA	107,313	54.2	920,607	42.3	9	39.1
Greensboro MSA AA	10,366	5.2	81,345	3.7	1	4.3
NC Non-MSA AA	28,487	14.4	613,925	28.2	8	34.8
Wilmington MSA AA	1,712	0.9	158,657	7.3	1	4.3
Winston-Salem MSA AA	50,190	25.3	404,143	18.5	4	17.4
Total	198,068	100.0	2,178,677	100.0	23	100.0

*Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.*

For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF NORTH CAROLINA

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the State of North Carolina regarding the Lending Test. The leader level of CD loans combined with good lending levels and good geographic distribution outweighs an adequate borrower profile record to support this conclusion. The Charlotte MSA AA demonstrated consistent performance, while the Greensboro MSA AA, NC Non-MSA AA, Wilmington MSA AA, and Winston-Salem MSA AA demonstrated inconsistent performance below the rated area’s record.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the State of North Carolina. Good performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to AA credit needs in the State of North Carolina. For 2024, the bank originated 146 reportable home mortgage loans totaling approximately \$76.9 million in the State of North Carolina AAs. Bank OZK captured 0.2 percent market share of the total number of home mortgage loans and 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 96th of 789 total lenders in the bank's State of North Carolina AAs. This ranking lands the bank in the top 15.0 percent of lenders reporting such loans, at 12.2 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the State of North Carolina. For 2023, the bank originated 75 reportable small business loans totaling approximately \$14.6 million in the State of North Carolina AAs. Bank OZK captured 0.1 percent market share of the total number of small business loans and 0.5 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 54th of 188 total lenders in the bank's State of North Carolina AAs. This ranking lands the bank in the top third of lenders reporting such loans, at 28.7 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AAs in the State of North Carolina. The Winston-Salem MSA AA demonstrated consistent performance. Performance in the Greensboro MSA AA, NC Non-MSA AA, and Wilmington MSA AA falls below the rated area's record, and performance in the Charlotte MSA AA rises above that of the rated area's record.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the State of North Carolina. The performance is consistent in all five AAs.

Community Development Loans

The institution is a leader in making CD loans in the State of North Carolina. The Charlotte MSA AA and Wilmington MSA AA demonstrated consistent performance, while the Greensboro MSA AA, NC Non-MSA AA, and Winston-Salem MSA AA performance falls below the rated area.

The following table shows that since the previous evaluation, the bank granted 28 CD loans totaling approximately \$155.2 million in the State of North Carolina. The dollar amount equates to 8.8 percent of the bank's overall leader level of CD loans. As noted, the State of North Carolina contributed 12.9 percent of reported loans. The current level reflects a decrease in the number but an increase in the dollar volume from the 40 CD loans totaling approximately \$56.8 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area State of North Carolina										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Charlotte MSA AA	8	69,660	2	6,218	3	37,554	1	279	14	113,711
Greensboro MSA AA	1	2,200	0	0	0	0	0	0	1	2,200
NC Non-MSA AA	0	0	0	0	1	239	0	0	1	239
Wilmington MSA AA	2	18,400	0	0	0	0	0	0	2	18,400
Winston-Salem MSA AA	2	1,379	5	3,680	1	1,057	0	0	8	6,116
Statewide Activities	2	14,500	0	0	0	0	0	0	2	14,500
Total	15	106,139	7	9,898	5	38,850	1	279	28	155,166
<i>Source: Bank Data</i>										

The CD loans reflect good responsiveness to the state’s CD needs. Although the bank’s CD loans primarily supported affordable housing efforts, they also demonstrated responsiveness to the identified needs of community service, economic development, and revitalization or stabilization efforts.

The following lists an example of a CD loan in the broader statewide area:

- **Affordable Housing** – The bank granted two loans totaling \$14.5 million to extend financing of the construction of a 90 unit multi-family housing complex in the broader statewide region of North Carolina. The rents for these units are restricted to LMI individuals/families as the transaction is eligible for LIHTCs.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the State of North Carolina regarding the Investment Test. The excellent level of QIs, excellent responsiveness to CD needs, and an extensive use of innovative and/or complex investments support this conclusion. Performance in the Charlotte MSA AA, Greensboro MSA AA, and Wilmington MSA AA demonstrated consistent performance, while performance in the NC Non-MSA AA and Winston-Salem MSA AA fall below the rated area level.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the State of North Carolina. The following table shows that Bank OZK made 83 QIs totaling approximately \$80.5 million in the State of North Carolina. By dollar volume, this equates to 8.5 percent of the bank’s overall excellent level of QIs. As noted, the State of North Carolina contributed 6.6 percent of the bank’s total deposits. The current level reflects an increase from the 41 QIs totaling approximately \$22.2 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area State of North Carolina										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Charlotte MSA AA	20	46,609	9	34	8	60	2	8	39	46,711
Greensboro MSA AA	0	0	1	3	3	2,210	0	0	4	2,213
NC Non-MSA AA	9	45	3	8	0	0	0	0	12	53
Wilmington MSA AA	2	7,374	1	5	0	0	0	0	3	7,379
Winston-Salem MSA AA	9	323	6	18	6	3,786	2	7	23	4,134
Statewide Activities	2	20,045	0	0	0	0	0	0	2	20,045
Total	42	74,396	20	68	17	6,056	4	15	83	80,535
<i>Source: Bank Data</i>										

The following lists an example of a QI in the broader statewide area:

- **Affordable Housing** – The bank invested \$20.0 million in MBSs with LMI borrowers located outside the bank’s AAs but in the State of North Carolina.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the State of North Carolina. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need in the rated area. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution makes extensive use of innovative and/or complex investments to support CD initiatives in the State of North Carolina. The bank has approximately \$52.9 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$37.8 million in LIHTCs within the State of North Carolina.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the State of North Carolina regarding the Service Test. The adequate level of CD services, reasonable accessibility of delivery systems, services that do not vary in a way that inconveniences portions of the AAs, and opening and closing of branches that have generally not adversely affected the accessibility of its delivery systems support this conclusion. This performance is consistent in all five AAs.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s AAs in the State of North Carolina. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion. This performance reflects consistent conclusions with the institution’s Accessibility of Delivery Systems performance.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the AAs in the State of North Carolina. As reflected in the following table, the distribution of Bank OZK’s branches in low-income census tracts reflects a level slightly above the percentage of population by 3.3 percentage points, reflecting reasonable accessibility. The table further shows that Bank OZK’s branch distribution in moderate-income census tracts reflects a level slightly trailing the percentage of population by 1.9 percentage points, also reflecting reasonable accessibility.

Branch and ATM Distribution by Geography Income Level State of North Carolina								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	52	6.0	159,680	4.7	2	8.0	2	8.0
Moderate	226	26.0	871,709	25.9	6	24.0	6	24.0
Middle	317	36.4	1,279,016	37.9	7	28.0	7	28.0
Upper	261	30.0	1,038,808	30.8	10	40.0	10	40.0
NA	14	1.6	22,636	0.7	0	0.0	0	0.0
Total	870	100.0	3,371,849	100.0	25	100.0	25	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

Bank OZK’s alternative delivery systems and product offerings also demonstrate reasonable accessibility to essentially all portions of the bank’s AAs. In both LMI census tracts, Bank OZK’s percentage of ATMs mirrors that of the branches. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the State of North Carolina. During the evaluation period, the bank opened two branches, one in a middle-income census tract and one in an upper-income census tract in the State of North Carolina. No branching changes occurred in LMI census tracts in the rated area.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals in the State of North Carolina. The State of North Carolina reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides an adequate level of CD services in the State of North Carolina. As seen in the following table, Bank OZK provided 160 CD services since the previous evaluation in this rated area. This represents 6.3 percent of the bank’s total relatively high level of CD services, and the State of North Carolina contained 10.4 percent of the bank’s total branches. A substantial majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 132 CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area State of North Carolina					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Charlotte MSA AA	10	58	26	0	94
Greensboro MSA AA	0	6	3	0	9
NC Non-MSA AA	4	21	1	0	26
Wilmington MSA AA	1	4	0	0	5
Winston-Salem MSA AA	5	15	6	0	26
Total	20	104	36	0	160
<i>Source: Bank Data</i>					

CHARLOTTE MSA AA – Full-Scope Review

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
CHARLOTTE MSA AA**

Bank OZK designated all 486 census tracts that make up Cabarrus, Gaston, Lincoln, Mecklenburg, and Rowan Counties, 5 of the 11 counties that make up the Charlotte-Concord-Gastonia, NC-SC MSA, located in southcentral North Carolina.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 28 low-, 143 moderate-, 140 middle-, 164 upper-income census tracts, and 11 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Charlotte MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	486	5.8	29.4	28.8	33.7	2.3
Population by Geography	1,802,914	4.8	29.8	29.9	34.5	1.0
Housing Units by Geography	729,308	5.1	30.8	29.2	33.7	1.2
Owner-Occupied Units by Geography	410,644	2.6	26.7	30.9	39.4	0.5
Occupied Rental Units by Geography	257,193	8.8	36.5	26.9	25.6	2.2
Vacant Units by Geography	61,471	6.7	33.5	28.1	29.3	2.4
Businesses by Geography	249,684	5.1	26.9	24.7	40.9	2.3
Farms by Geography	1,709	2.1	22.1	37.3	37.3	1.2
Family Distribution by Income Level	426,303	22.3	17.5	19.5	40.7	0.0
Household Distribution by Income Level	667,837	23.5	17.0	18.0	41.6	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value Median Gross Rent Families Below Poverty Level			\$241,289 \$1,118 8.5%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on September 28, 2024, for Gaston and Lincoln Counties due to Tropical Storm Helene.

According to Moody’s Analytics, major employers in the area consist of Atrium Health, Wells Fargo & Co., Bank of America Corp., American Airlines Group, and Novant Health Inc. The following table lists annual unemployment rates over the evaluation period for the AA, State of North Carolina, and nationwide.

Unemployment Rates Charlotte MSA AA			
Area	2022	2023	2024
	%	%	%
Cabarrus County	3.4	3.3	3.4
Gaston County	3.8	3.5	3.7
Lincoln County	3.3	3.1	3.3
Mecklenburg County	3.6	3.5	3.7
Rowan County	3.7	3.4	3.5
State of North Carolina	3.7	3.5	3.6
National Average	3.6	3.6	4.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 365 offices from its 41 institutions serving about 4,939 people on average. Bank OZK ranked 13th in deposit market share by capturing 0.2 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local CD organization that focuses on small businesses and affordable housing. The contact stated the economic conditions are improving but still recovering from pandemic-era conditions. According to the contact, affordable housing continues to be a major challenge with developers needing more flexible and longer-term financing options to make deals feasible. Small business development and support is another priority identified by the contact as an area needing more investment from banks and partners. Overall, the contact indicated that access to financial services is adequate and the entity routinely works with financial institutions to help assist the community with affordable housing and CD needs.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area's primary credit needs include residential and small business loans. With respect to the area's CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHARLOTTE MSA AA

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the Charlotte MSA AA regarding the Lending Test. Adequate borrower profile performance and good lending levels hampers the bank's leader level of CD loans and excellent geographic distribution performance to support this conclusion.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the Charlotte MSA AA. Good performance regarding home mortgage lending levels outweighs adequate performance regarding small business lending levels to support this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to AA credit needs in the Charlotte MSA AA. For 2024, the bank originated 55 reportable home mortgage loans totaling approximately \$63.5 million inside the AA. Bank OZK captured 0.1 percent market share of the total number of home mortgage loans and 0.3 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 134th of 694 total lenders in the AA and ranks the bank in the top 20.0 percent of lenders reporting such loans, at 19.3 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Charlotte MSA AA. For 2023, the bank originated 17 reportable small business loans totaling approximately \$3.0 million inside the AA. Bank OZK captured 0.03 percent market share of the total number of small business loans and 0.2 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 66th of 163 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 40.5 percent.

Geographic Distribution

The geographic distribution of loans reflects excellent penetration throughout the Charlotte MSA AA. Excellent performances regarding home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent performance in the Charlotte MSA AA. Excellent performance in the moderate-income geographies outweighs adequate performance in low-income geographies to support this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts falls 2.1 percentage points below aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank's level of lending rises 13.7 percentage points above aggregate data, reflecting an excellent level.

Geographic Distribution of Home Mortgage Loans Charlotte MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.6	3.9	1	1.8	8,240	13.0
Moderate	26.7	26.3	22	40.0	5,458	8.6
Middle	30.9	31.4	14	25.5	1,660	2.6
Upper	39.4	37.9	18	32.7	48,173	75.8
NA	0.5	0.5	0	0.0	0	0.0
Total	100.0	100.0	55	100.0	63,531	100.0

*Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

The geographic distribution of small business loans reflects excellent performance in the Charlotte MSA AA. Excellent performance in the moderate-income geographies outweighs adequate performance in the low-income geographies to support this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts rises 7.3 percentage points above aggregate data, reflective of adequate performance. The table further shows in moderate-income census tracts the bank's level of lending rises 26.9 percentage points above aggregate data, reflective of excellent performance. Further, the table shows in low-income geographies the bank's level falls within an adequate range of available D&B data while in moderate-income geographies the bank's level falls within an excellent range of available D&B data.

Geographic Distribution of Small Business Loans Charlotte MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.0	4.5	2	11.8	398	13.1
Moderate	27.2	26.0	9	52.9	1,754	57.9
Middle	25.0	26.5	4	23.5	636	21.0
Upper	40.6	41.1	1	5.9	110	3.6
NA	2.2	1.9	1	5.9	133	4.4
Total	100.0	100.0	17	100.0	3,031	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Charlotte MSA AA. Adequate home mortgage lending performance outweighs excellent small business lending performance to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Charlotte MSA AA. Adequate performance to both LMI borrowers supports this conclusion. As seen in the following table, the bank's level of lending to low-income borrowers falls 2.8 percentage points below aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank's level of lending falls 4.9 percentage points below aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Charlotte MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.3	6.4	2	3.6	90	0.1
Moderate	17.5	15.8	6	10.9	373	0.6
Middle	19.5	19.6	16	29.1	1,544	2.4
Upper	40.7	40.3	17	30.9	3,553	5.6
Income Not Available	0.0	18.0	14	25.5	57,971	91.3
Total	100.0	100.0	55	100.0	63,531	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The distribution of borrowers reflects excellent penetration among business customers of different sizes in the Charlotte MSA AA. Excellent performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank's level of lending to businesses with gross annual revenues of \$1 million or less trails D&B data but rises 16.8 percentage points above the aggregate data, reflecting excellent performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Charlotte MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	92.2	53.8	12	70.6	2,085	68.8
> \$1,000,000	2.2	--	5	29.4	946	31.2
Revenue Not Available	5.6	--	0	0.0	0	0.0
Total	100.0	100.0	17	100.0	3,031	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.</i>						

Community Development Loans

The institution is a leader in making CD loans in the Charlotte MSA AA. As noted under the rated area level, the bank originated 14 CD loans totaling approximately \$113.7 million in the Charlotte MSA AA. The dollar amount equates to 73.3 percent of the bank's overall leader level of CD loans in the State of North Carolina. As noted, the Charlotte MSA AA contributed 54.2 percent of reported loans for the State of North Carolina. The current level reflects a decrease in the number but an increase in the dollar volume of 20 CD loans totaling approximately \$48.6 million in this AA at the prior evaluation.

In addition, the CD loans reflect excellent responsiveness to the AA's CD needs. The bank's CD loans primarily supported affordable housing efforts, a significant need of the area, and also demonstrated responsiveness to identified needs of community service, economic development, and revitalization or stabilization efforts.

The following lists an example of a CD loan within the Charlotte MSA AA:

- ***Affordable Housing*** – The bank originated a \$30.0 million loan to finance the construction of a 140-unit family housing complex. The rents for these units are restricted to LMI individuals/families. Additionally, the housing complex is located in a moderate-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the Charlotte MSA AA regarding the Investment Test. The excellent level of QIs, excellent responsiveness to CD needs, and extensive use of innovative and/or complex investments support this conclusion.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the Charlotte MSA AA. As noted in the rated area level, the bank made 39 QIs totaling approximately \$46.7 million in the Charlotte MSA AA. The dollar amount equates to 58.0 percent of the bank's overall excellent level of QIs in the State of North Carolina. As noted, the Charlotte MSA AA accounted for 42.3 percent of the bank's deposits for the State of North Carolina. The current level reflects an increase from the 18 QIs totaling approximately \$21.0 million in this AA at the prior evaluation.

The following lists an example of a QI in the Charlotte MSA AA:

- ***Affordable Housing*** – The bank invested over \$23.2 million in LIHTCs to support the construction/rehabilitation of affordable housing projects serving LMI individuals/families in the AA. These projects will support the construction/rehabilitation of 329 affordable housing units in the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Charlotte MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank's Charlotte MSA AA. In addition, the bank did not ignore any CD categories, as there was activity in the remaining categories.

Community Development Initiatives

The institution makes extensive use of innovative and/or complex investments to support CD initiatives in the Charlotte MSA AA. The bank has approximately \$45.4 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$30.5 million in LIHTCs within the Charlotte MSA AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Charlotte MSA AA regarding the Service Test. The reasonable accessibility of delivery systems and services that do not vary in a way that inconveniences portions of the AA outweigh a relatively high level of CD services to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Charlotte MSA AA. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the Charlotte MSA AA. Although the bank does not operate any branches in the low-income census tracts in the AA as seen in the following table, this reflects reasonable accessibility considering only 4.8 percent of the population resides in these tracts. The table further shows that in moderate-income census tracts, the bank’s distribution of branches rises slightly above the population percentage by 3.5 percentage points, also reflecting reasonable accessibility.

Branch and ATM Distribution by Geography Income Level Charlotte MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	28	5.8	86,318	4.8	0	0.0	0	0.0
Moderate	143	29.4	537,098	29.8	3	33.3	3	33.3
Middle	140	28.8	539,613	29.9	2	22.2	2	22.2
Upper	164	33.7	622,745	34.5	4	44.4	4	44.4
NA	11	2.3	17,140	1.0	0	0.0	0	0.0
Total	486	100.0	1,802,914	100.0	9	100.0	9	100.0

*Source: 2020 U.S. Census Data; Bank Data
Due to rounding, totals may not equal 100.0.*

The bank’s alternative delivery systems and product offerings also demonstrate reasonable accessibility to essentially all portions of the AA. Bank OZK’s distribution of ATMs in LMI census tracts reflects the same distribution to that of the branches in the AA. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

Bank OZK did not make any changes to branch locations in the Charlotte MSA AA since the previous evaluation. Therefore, examiners did not consider this factor when evaluating the bank's retail banking services.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Charlotte MSA AA. The Charlotte MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides a relatively high level of CD services in the Charlotte MSA AA. As seen in the table for the State of North Carolina, the bank provided 94 CD services since the previous evaluation in the Charlotte MSA AA. This represents 58.8 percent of the bank's total adequate level of CD services in the State of North Carolina, and the Charlotte MSA AA contained 36.0 percent of the bank's total branches in the State of North Carolina. A majority of the activities focused on community services, which demonstrates the bank's responsiveness to an identified CD need. The current level reflects an increase from the 29 CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Charlotte MSA AA:

- ***Community Services*** – Several employees led financial educational sessions for students of local school districts where the majority of students participate in the free and reduced school lunch program. The sessions covered items such as budgeting and savings. Thus, the activities benefit organizations that provide community services primarily to LMI individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions from the limited-scope reviews contributed to the institution's overall performance in the State of North Carolina.

Assessment Area	Lending Test	Investment Test	Service Test
Greensboro MSA AA	Below	Consistent	Consistent
NC Non-MSA AA	Below	Below	Consistent
Wilmington MSA AA	Below	Consistent	Consistent
Winston-Salem MSA AA	Below	Below	Consistent

Facts and data supporting conclusions for the AAs follows, including a summary of the institution's operations and activities, followed by geographic distribution and borrower profile tables by loan type. The appendices include demographic data for the limited-scope AAs.

Greensboro MSA AA

The Greensboro MSA AA consists of all census tracts in Randolph County. The bank operates one branch in this AA located in a moderate-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is above the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	3	269
Home Mortgage Loans	7	1,041
Community Development Loans	1	2,200
Investments (New)	1	2,200
Investments (Prior Period)	0	0
Donations	3	13
CD Services	9	-
<i>Source: Bank Data</i>		

NC Non-MSA AA

The NC Non-MSA AA consists of all census tracts in Cleveland and Rutherford Counties. The bank operates eight branches in this AA with two located in low-income census tracts, one located in a moderate-income census tract, two located in middle-income census tracts, and three located in upper-income census tracts. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	24	7,090
Home Mortgage Loans	34	3,566
Community Development Loans	1	239
Investments (New)	0	0
Investments (Prior Period)	0	0
Donations	12	53
CD Services	26	-
<i>Source: Bank Data</i>		

Wilmington MSA AA

The Wilmington MSA AA consists of all census tracts in New Hanover County. The bank operates one branch in this AA located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	1	80
Home Mortgage Loans	2	540
Community Development Loans	2	18,400
Investments (New)	1	7,233
Investments (Prior Period)	1	141
Donations	1	5
CD Services	5	-
<i>Source: Bank Data</i>		

Winston-Salem MSA AA

The Winston-Salem MSA AA consists of all census tracts in Davidson, Davie, and Forsyth Counties. The bank operates four branches in this AA with one located in a moderate-income census tract, two located in middle-income census tracts, and one located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	30	4,171
Home Mortgage Loans	48	8,191
Community Development Loans	8	6,116
Investments (New)	1	3,750
Investments (Prior Period)	2	287
Donations	20	97
CD Services	26	-
<i>Source: Bank Data</i>		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Greensboro MSA	7	1,041	0.3	3,396	0.9	0	0.8	25	28.6	26.6	63.3	57.1	64.2	10.8	14.3	8.4	0	0	0
NC Non-MSA	34	3,566	1.5	3,849	1.1	2.9	1.5	17.9	11.8	20.9	69.7	64.7	63.7	11.3	20.6	13.9	0	0	0.1
Wilmington MSA	2	540	0.1	7,255	2.3	0	2	19.7	0	21.4	27.2	0	30.3	49.9	100	44.9	0.9	0	1.3
Winston-Salem MSA	48	8,191	2.1	16,495	3.4	14.6	4.5	12.3	29.2	11.8	49.9	45.8	50.8	34.3	10.4	32.9	0	0	0

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Greensboro MSA	3	269	0.2	2,371	2.6	0	2.2	35.9	66.7	32	52.9	33.3	56.4	8.6	0	9.5	0	0	0
NC Non-MSA	24	7,090	1.2	2,568	3.8	12.5	2.5	24.4	20.8	20.3	54.9	45.8	59.2	16.8	20.8	18	0	0	0
Wilmington MSA	1	80	0.1	8,050	4.6	0	4.2	26.6	0	31.7	25	100	25	43.2	0	38.6	0.7	0	0.6
Winston-Salem MSA	30	4,171	1.5	11,294	5.9	6.7	5	16.4	10	15.1	42.1	76.7	45.2	35.7	6.7	34.7	0	0	0

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Greensboro MSA	7	1,041	0.3	3,396	22.4	0	7.8	22.3	28.6	22.1	20.5	14.3	26.2	34.7	42.9	29.2	0	14.3	14.7
NC Non-MSA	34	3,566	1.5	3,849	23.4	11.8	5.6	19.9	17.7	17	19.4	23.5	23.9	37.4	35.3	38.2	0	11.8	15.3
Wilmington MSA	2	540	0.1	7,255	21	0	4.7	16.9	0	12.4	18.1	0	17.1	44	100	46.2	0	0	19.6
Winston-Salem MSA	48	8,191	2.1	16,495	21.6	2.1	6.4	16.9	6.3	18.4	19.9	16.7	22.4	41.6	29.2	36.4	0	45.8	16.5

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Greensboro MSA	3	269	0.5	2,371	89.6	100	57.4	3.5	0	6.9	0	
NC Non-MSA	24	7,090	3.9	2,568	89.2	62.5	58.6	3.1	29.2	7.7	8.3	
Wilmington MSA	1	80	0.2	8,050	91.1	100	52.5	2.4	0	6.5	0	
Winston-Salem MSA	30	4,171	4.9	11,294	90.8	56.7	56.8	2.7	33.3	6.5	10	

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

STATE OF TEXAS

CRA RATING FOR TEXAS: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF TEXAS

Bank OZK designated four AAs in the State of Texas as noted in the table below.

Description of Assessment Areas State of Texas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Austin MSA AA	Caldwell, Travis, Williamson	436	4
Dallas-Fort Worth MSA AA	Collin, Dallas, Denton, Tarrant	1,507	15
Houston MSA AA	Harris, Galveston	1,218	7
San Antonio MSA AA	Bexar	375	1

Source: Bank Data; 2020 U.S. Census Data

SCOPE OF EVALUATION – STATE OF TEXAS

For the Lending Test, examiners considered the following loans granted inside the bank's State of Texas AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans

- 2022: 98 loans totaling \$48,729,000
- 2023: 37 loans totaling \$19,002,000
- 2024: 63 loans totaling \$30,348,000

Small Business Loans

- 2022: 55 loans totaling \$19,337,000
- 2023: 45 loans totaling \$18,804,000
- 2024: 138 loans totaling \$27,339,000

Consistent with the weighting described at the institution level, examiners placed slightly more weight on home mortgage loans when arriving at applicable conclusions for the State of Texas due to the volume of lending.

The following table shows that the Dallas-Fort Worth MSA AA accounted for the largest volume of the bank’s loans, deposits, and branches in the State of Texas. Consequently, examiners applied full-scope procedures and weighed performance in the Dallas-Fort Worth MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners applied limited-scope procedures to the remaining AAs and generally weighed performance in each area consistent with the lending level reflected in the following table.

Assessment Area Breakdown of Loans, Deposits, and Branches State of Texas						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Austin MSA AA	34,494	21.1	381,850	10.6	4	14.8
Dallas-Fort Worth MSA AA	73,457	44.9	2,609,376	72.6	15	55.5
Houston MSA AA	31,132	19.0	444,934	12.4	7	25.9
San Antonio MSA AA	24,476	15.0	158,751	4.4	1	3.7
Total	163,559	100.0	3,594,911	100.0	27	100.0

*Source: 2022-2024 HMDA and CRA Reported Data; FDIC Summary of Deposits (06/30/2025)
Due to rounding, totals may not equal 100.0.*

For the Investment and Service Tests, the scopes remain consistent for this rated area as discussed for the institution overall. Refer to the Scope of Evaluation section at the institution level for details.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF TEXAS

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the State of Texas regarding the Lending Test. The leader level of CD loans combined with good geographic distribution lifts the adequate borrower profile performance and adequate lending levels to support this conclusion. The Dallas-Fort Worth MSA AA demonstrated consistent performance, while the Austin MSA AA, Houston MSA AA, and San Antonio MSA AA demonstrated inconsistent performance below the rated area’s record.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs in the State of Texas. Adequate performances regarding home mortgage and small business loans support this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect adequate responsiveness to AA credit needs in the State of Texas. For 2024, the bank originated 63 reportable home mortgage loans totaling approximately \$30.3 million in the State of Texas AAs. Bank OZK captured 0.02 percent market share of the total number of home mortgage loans and 0.02 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 364th of 1,166 total lenders in the bank’s State of Texas AAs. This ranking lands the bank in the top half of lenders reporting such loans, at 31.2 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the State of Texas. For 2023, the bank originated 45 reportable small business loans totaling approximately \$18.8 million in the State of Texas AAs. Bank OZK captured 0.01 percent market share of the total number of small business loans and 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 119th of 354 total lenders in the bank's State of Texas AAs. This ranking lands the bank in the top half of lenders reporting such loans, at 33.6 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the AAs in the State of Texas. The Dallas-Fort Worth MSA AA and San Antonio MSA AA demonstrated consistent performance. Performance in the Austin MSA AA fall below the rated area's record and performance in the Houston MSA AA rises above the rated area's record.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the State of Texas. The Dallas-Fort Worth MSA AA demonstrated consistent performance, while the Austin MSA AA, Houston MSA AA, and San Antonio MSA AA demonstrated inconsistent performance that falls below the rated area's record.

Community Development Loans

The institution is a leader in making CD loans in the State of Texas. The Austin MSA AA and Dallas-Fort Worth MSA AA demonstrated consistent performance, while the Houston MSA AA and San Antonio MSA AA performance falls below the rated area.

The following table shows that since the previous evaluation, the bank granted 35 CD loans totaling approximately \$299.6 million in the State of Texas. The dollar amount equates to 17.0 percent of the bank's overall leader level of CD loans. As noted, the State of Texas contributed 10.7 percent of reported loans. The current level reflects a decrease from the 40 CD loans totaling approximately \$406.7 million in this rated area at the prior evaluation.

Community Development Lending by Assessment Area State of Texas										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Austin MSA AA	9	103,046	0	0	3	6,253	1	412	13	109,711
Dallas-Fort Worth MSA AA	10	162,898	0	0	3	6,522	3	6,646	16	176,066
Houston MSA AA	2	8,050	1	1,060	0	0	1	4,000	4	13,110
San Antonio MSA AA	1	425	0	0	1	301	0	0	2	726
Total	22	274,419	1	1,060	7	13,076	5	11,058	35	299,613
<i>Source: Bank Data</i>										

The CD loans reflect excellent responsiveness to the state’s CD needs. Although the bank’s CD loans primarily supported affordable housing efforts, a significant need, they also demonstrated responsiveness to the identified needs of community service, economic development, and revitalization or stabilization efforts.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the State of Texas regarding the Investment Test. The significant use of innovative and/or complex investments is lifted by an excellent level of QIs and excellent responsiveness to CD needs to support this conclusion. This performance is consistent in all four AAs.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the State of Texas. The following table shows that Bank OZK made 135 QIs totaling approximately \$232.0 million in the State of Texas. By dollar volume, this equates to 24.4 percent of the bank’s overall excellent level of QIs. As noted, the State of Texas contributed 10.9 percent of the bank’s total deposits. The current level reflects an increase from the 70 QIs totaling approximately \$108.4 million in this rated area at the prior evaluation.

Community Development Qualified Investments by Assessment Area State of Texas										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Austin MSA AA	16	29,544	2	8	5	85	0	0	23	29,637
Dallas-Fort Worth MSA AA	25	72,501	13	4,119	14	9,550	0	0	52	86,170
Houston MSA AA	17	9,796	11	40	2	5,626	0	0	30	15,462
San Antonio MSA AA	6	29,427	4	6,064	5	43	0	0	15	35,534
Statewide Activities	12	50,889	0	0	3	14,355	0	0	15	65,244
Total	76	192,157	30	10,231	29	29,659	0	0	135	232,047
<i>Source: Bank Data</i>										

The following lists an example of a QI in the broader statewide area:

- **Affordable Housing** – The bank has prior period investments of approximately \$46.6 million in single-family revenue bonds for new mortgages targeted to LMI individuals across the broader State of Texas.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the State of Texas. As reflected in the above table, a majority of the QIs funded affordable housing, an identified and significant CD need in the rated area.

Community Development Initiatives

The institution makes significant use of innovative and/or complex investments to support CD initiatives in the State of Texas. The bank has approximately \$138.8 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$81.7 million in LIHTCs within the State of Texas.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the State of Texas regarding the Service Test. The adequate level of CD services, reasonable accessibility of delivery systems, services that do not vary in a way that inconveniences portions of the AAs, and opening and closing of branches that have generally not adversely affected the accessibility of its delivery systems support this conclusion. This performance is consistent in all four AAs.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the institution’s AAs in the State of Texas. The bank’s reasonably accessible branch distribution and alternative delivery systems support this conclusion. This performance reflects consistent conclusions with the institution’s Accessibility of Delivery Systems performance.

Bank OZK’s branch distribution is reasonably accessible to essentially all portions of the AAs in the State of Texas. As reflected in the following table, the distribution of Bank OZK’s branches in low-income census tracts trails the percentage of population by 9.9 percentage points, reflecting limited accessibility. The table further shows that Bank OZK’s branch distribution in moderate-income census tracts reflects a level slightly trailing the percentage of population by 1.0 percentage point, reflecting reasonable accessibility. The performance level in the moderate-income census tracts outweighs that of the low-income census tracts to support this conclusion.

Branch and ATM Distribution by Geography Income Level State of Texas								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	406	11.5	1,551,969	9.9	0	0.0	0	0.0
Moderate	984	27.8	4,224,206	26.9	7	25.9	7	23.3
Middle	972	27.5	4,635,662	29.5	5	18.5	6	20.0
Upper	1088	30.8	5,118,463	32.5	15	55.6	17	56.7
NA	86	2.4	201,005	1.3	0	0.0	0	0.0
Total	3,536	100.0	15,731,305	100.0	27	100.0	30	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

Bank OZK’s alternative delivery systems and product offerings also demonstrate reasonable accessibility to essentially all portions of the bank’s AAs. In both LMI census tracts, Bank OZK’s percentage of ATMs is similar to that of the branches. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered throughout all portions of the AAs.

Changes in Branch Locations

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals in the State of Texas. During the evaluation period, the bank opened two branches located in moderate-income census tracts and closed one branch located in a moderate-income census tract in the State of Texas. The remaining five branch openings occurred in middle- and upper-income census tracts in the State of Texas.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies and/or individuals in the State of Texas. The State of Texas reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides an adequate level of CD services in the State of Texas. As seen in the following table, Bank OZK provided 222 CD services since the previous evaluation in this rated area. This represents 8.7 percent of the bank’s total relatively high level of CD services, and the State of Texas contained 11.3 percent of the bank’s total branches. A clear majority of the activities focused on community services, which demonstrates the bank’s responsiveness to an identified CD need. The current level reflects an increase from the 64 CD services in this rated area at the prior evaluation.

Community Development Services by Assessment Area State of Texas					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Austin MSA AA	2	9	8	0	19
Dallas-Fort Worth MSA AA	0	117	32	0	149
Houston MSA AA	2	38	4	0	44
San Antonio MSA AA	0	3	7	0	10
Total	4	167	51	0	222
<i>Source: Bank Data</i>					

DALLAS-FORT WORTH MSA AA – Full-Scope Review

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
DALLAS-FORT WORTH MSA AA**

Bank OZK designated all 1,507 census tracts that make up Collin, Dallas, Denton, and Tarrant Counties, 4 of the 11 counties that make up the Dallas-Fort Worth-Arlington MSA, located in northeast Texas.

Economic and Demographic Data

The AA’s census tracts reflect the following income designations based on 2020 U.S. Census Data: 149 low-, 400 moderate-, 426 middle-, 508 upper-income census tracts, and 24 tracts with no income designation. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Dallas-Fort Worth MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,507	9.9	26.5	28.3	33.7	1.6
Population by Geography	6,695,066	9.3	25.7	29.2	35.0	0.9
Housing Units by Geography	2,502,649	9.9	25.5	29.9	33.8	1.0
Owner-Occupied Units by Geography	1,337,186	4.6	20.1	31.1	43.8	0.4
Occupied Rental Units by Geography	985,332	16.0	32.1	28.9	21.5	1.5
Vacant Units by Geography	180,131	15.3	28.9	26.6	27.2	1.9
Businesses by Geography	983,397	5.1	18.7	29.9	45.5	0.9
Farms by Geography	7,048	2.0	10.7	28.5	58.2	0.6
Family Distribution by Income Level	1,582,026	22.3	17.3	19.1	41.4	0.0
Household Distribution by Income Level	2,322,518	23.1	17.0	17.9	41.9	0.0
Median Family Income MD - 19124 Dallas-Plano-Irving, TX MD		\$88,315	Median Housing Value		\$251,543	
Median Family Income MD - 23104 Fort Worth-Arlington-Grapevine, TX MD		\$82,649	Median Gross Rent		\$1,235	
			Families Below Poverty Level		8.4%	
<i>Source: 2020 U.S. Census Data; 2024 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on May 17, 2024, for Dallas County due to severe storms, straight-line winds, tornadoes, and flooding.

According to Moody's Analytics, major employers in the area consist of Walmart, UT Southwestern Medical Center, Baylor Scott & White Health, Lockheed Martin, and AT&T. The following table lists annual unemployment rates over the evaluation period for the AA, State of Texas, and nationwide.

Unemployment Rates Dallas-Fort Worth MSA AA			
Area	2022	2023	2024
	%	%	%
Collin County	3.3	3.6	3.8
Dallas County	3.8	4.0	4.1
Denton County	3.3	3.6	3.7
Tarrant County	3.7	3.8	3.9
State of Texas	3.9	4.0	4.1
National Average	3.6	3.6	4.1
<i>Source: Bureau of Labor Statistics</i>			

Competition

The area contains a low level of competition from other chartered banks based on its population, with each of the 1,398 offices from its 159 institutions serving about 4,789 people on average. Bank OZK ranked 21st in deposit market share by capturing 0.4 percent of the area's deposits based on the June 30, 2025, FDIC Deposit Market Share Report. In addition, credit unions, mortgage companies, and finance companies operate in the area, heightening the competition level. Overall, the competition level still allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners utilized a third-party contact active in the AA to assist in identifying the credit and CD needs. Examiners reviewed an existing community contact with a representative of a local non-profit organization dedicated to helping Texans achieve homeownership and build assets. The contact stated the economic conditions of the area are stable; however, there is a shortage of affordable homes. Additionally, the contact noted that businesses in the area still have not fully recovered from the pandemic as costs of supplies have increased, creating challenges for smaller businesses. Overall, the contact indicated that access to financial services is adequate, although the entity noted interest in more assistance from smaller banks.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined the area's primary credit needs include residential and small business loans. With respect to the area's CD needs, the information discussed herein, including the number of LMI geographies and families as well as unemployment levels, indicates needs for affordable housing and community services that benefit LMI individuals, economic development, and efforts that revitalize and stabilize the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN DALLAS-FORT WORTH MSA AA

LENDING TEST

Bank OZK demonstrated a high satisfactory record in the Dallas-Fort Worth MSA AA regarding the Lending Test. The bank's leader level of CD loans combined with good geographic distribution performance lifts the bank's adequate lending levels and adequate borrower profile performance to support this conclusion.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs in the Dallas-Fort Worth MSA AA. Adequate performance regarding home mortgage and small business loans supports this conclusion. Examiners weighed home mortgage lending performance heavier than small business lending performance when arriving at applicable conclusions.

Home Mortgage Loans

Home mortgage lending levels reflect adequate responsiveness to AA credit needs in the Dallas-Fort Worth MSA AA. For 2024, the bank originated 34 reportable home mortgage loans totaling approximately \$20.9 million inside the AA. Bank OZK captured 0.02 percent market share of the total number of home mortgage loans and 0.03 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 305th of 941 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 32.4 percent.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Dallas-Fort Worth MSA AA. For 2023, the bank originated 20 reportable small business loans totaling approximately \$7.7 million inside the AA. Bank OZK captured 0.01 percent market share of the total number of small business loans and 0.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 112th of 283 total lenders in the AA and ranks the bank in the top half of lenders reporting such loans, at 39.6 percent.

Geographic Distribution

The geographic distribution of loans reflects good penetration throughout the Dallas-Fort Worth MSA AA. Excellent performance regarding home mortgage lending is hampered by the adequate record regarding small business lending to support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent performance in the Dallas-Fort Worth MSA AA. Excellent performance in the moderate-income geographies outweighs the good performance in low-income geographies to support this conclusion. As seen in the following table, the bank's level of lending in low-income census tracts rises above aggregate data by 11.1 percentage points, reflective of good performance. The table further shows in moderate-income census tracts the bank's level of lending rises 32.3 percentage points above aggregate data, reflecting an excellent level.

Geographic Distribution of Home Mortgage Loans Dallas-Fort Worth MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	4.6	3.6	5	14.7	5,092	24.3
Moderate	20.1	14.8	16	47.1	4,677	22.4
Middle	31.1	36.0	9	26.5	1,955	9.3
Upper	43.8	45.0	4	11.8	9,198	44.0
NA	0.4	0.5	0	0.0	0	0.0
Total	100.0	100.0	34	100.0	20,922	100.0

*Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Dallas-Fort Worth MSA AA. Adequate performance in both LMI geographies support this conclusion. As seen in the following table, the bank’s level of lending in low-income census tracts rises 0.5 percentage points above aggregate data, reflective of adequate performance. The table also shows in moderate-income census tracts the bank’s level of lending falls 7.9 percentage points below aggregate data, reflective of adequate performance. Further, the table shows the bank’s levels in both LMI geographies trail available D&B data.

Geographic Distribution of Small Business Loans Dallas-Fort Worth MSA AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	5.2	4.5	1	5.0	979	12.7
Moderate	18.8	17.9	2	10.0	858	11.1
Middle	30.2	28.0	10	50.0	3,794	49.1
Upper	44.9	48.6	7	35.0	2,104	27.2
NA	0.9	1.0	0	0.0	0	0.0
Total	100.0	100.0	20	100.0	7,735	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes in the Dallas-Fort Worth MSA AA. Adequate home mortgage lending performance outweighs good small business lending performance to support this conclusion.

Home Mortgage Loans

The distribution of borrowers reflects adequate penetration among retail customers of different income levels in the Dallas-Fort Worth MSA AA. Adequate performance to both LMI borrowers supports this conclusion. As seen in the following table, the bank’s level of lending to low-income borrowers rises 7.8 percentage points above aggregate data, reflective of adequate performance. The table further shows that to moderate-income borrowers, the bank’s level of lending falls 3.3 percentage points below aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Dallas-Fort Worth MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.3	4.0	4	11.8	553	2.6
Moderate	17.3	12.1	3	8.8	592	2.8
Middle	19.1	18.4	3	8.8	1,088	5.2
Upper	41.4	40.0	6	17.7	1,972	9.4
Income Not Available	0.0	25.6	18	52.9	16,717	79.9
Total	100.0	100.0	34	100.0	20,922	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Aggregate Data; 2024 HMDA Reported Data Due to rounding, totals may not equal 100.0.</i>						

Small Business Loans

The distribution of borrowers reflects good penetration among business customers of different sizes in the Dallas-Fort Worth MSA AA. Good performance to businesses with gross annual revenues of \$1 million or less supports this conclusion. As shown in the following table, the bank's level of lending to businesses with gross annual revenues of \$1 million or less trails D&B data but rises 12.3 percentage points above the aggregate data, reflecting good performance.

Distribution of Small Business Loans by Gross Annual Revenue Category Dallas-Fort Worth MSA AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
≤ \$1,000,000	92.4	52.7	13	65.0	5,031	65.0
> \$1,000,000	2.2	--	7	35.0	2,704	35.0
Revenue Not Available	5.4	--	0	0.0	0	0.0
Total	100.0	100.0	20	100.0	7,735	100.0
<i>Source: 2023 D&B Data; 2023 CRA Aggregate Data; 2023 CRA Reported Data; "--" data not available Due to rounding, totals may not equal 100.0.</i>						

Community Development Loans

The institution is a leader in making CD loans in the Dallas-Fort Worth MSA AA. As noted under the rated area level, the bank originated 16 CD loans totaling approximately \$176.1 million in the Dallas-Fort Worth MSA AA. The dollar amount equates to 58.8 percent of the bank's overall leader level of CD loans in the State of Texas. As noted, the Dallas-Fort Worth MSA AA contributed 44.9 percent of reported loans for the State of Texas. The current level reflects an increase in the number but a decrease in the dollar volume of 13 CD loans totaling approximately \$247.7 million in this AA at the prior evaluation.

In addition, the CD loans reflect excellent responsiveness to the AA's CD needs. The bank's CD loans primarily supported affordable housing efforts, a significant need in the area, and also demonstrated responsiveness to identified needs of economic development and revitalization or stabilization efforts.

The following lists an example of a CD loan within the Dallas-Fort Worth MSA AA:

- ***Affordable Housing*** – The bank originated a \$27.5 million loan to finance the rehabilitation of a 164-unit housing complex serving elderly individuals. The rents for these units is restricted to LMI individuals. Additionally, the housing complex is located in a moderate-income geography and the bank invested in LIHTCs for this transaction.

INVESTMENT TEST

Bank OZK demonstrated an outstanding record for the Dallas-Fort Worth MSA AA regarding the Investment Test. The excellent level of QIs, excellent responsiveness to CD needs, and extensive use of innovative and/or complex investments support this conclusion.

Investment and Grant Activity

The institution has an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors in the Dallas-Fort Worth MSA AA. As noted in the rated area level, the bank made 52 QIs totaling approximately \$86.2 million in the Dallas-Fort Worth MSA AA. The dollar amount equates to 37.1 percent of the bank's overall excellent level of QIs in the State of Texas. As noted, the Dallas-Fort Worth MSA AA accounted for 72.6 percent of the bank's deposits for the State of Texas. The current level reflects an increase from the 29 QIs totaling approximately \$47.6 million in this AA at the prior evaluation.

The following lists an example of a QI in the Dallas-Fort Worth MSA AA:

- ***Affordable Housing*** – The bank invested over \$39.7 million in LIHTCs to support the construction/rehabilitation of affordable housing projects serving LMI individuals/families in the AA. These projects will support the construction/rehabilitation of 402 affordable housing units in the area.

Responsiveness to Credit and Community Development Needs

The institution exhibits excellent responsiveness to credit and CD needs in the Dallas-Fort Worth MSA AA. A substantial majority of the QIs funded affordable housing, an identified and significant need in the bank's Dallas-Fort Worth MSA AA.

Community Development Initiatives

The institution makes extensive use of innovative and/or complex investments to support CD initiatives in the Dallas-Fort Worth MSA AA. The bank has approximately \$77.1 million in new and prior period complex investments that are still maintained in the investment portfolio. For example, the bank financed several complex QIs for approximately \$39.7 million in LIHTCs within the Dallas-Fort Worth MSA AA.

SERVICE TEST

Bank OZK demonstrated a low satisfactory record in the Dallas-Fort Worth MSA AA regarding the Service Test. The adequate level of CD services, reasonable accessibility of delivery systems, services that do not vary in a way that inconveniences portions of the AA, and opening and closing of branches that have generally not adversely affected the accessibility of its delivery systems support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the Dallas-Fort Worth MSA AA. The bank's reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Bank OZK's branch distribution is reasonably accessible to essentially all portions of the Dallas-Fort Worth MSA AA. As reflected in the following table, the bank does not operate any branches in the low-income census tracts in the AA, reflecting limited accessibility considering 9.2 percent of the population resides in these tracts. The table further shows that in moderate-income census tracts, the bank's distribution of branches reflects a level slightly trailing the population percentage by 5.7 percentage points, which reflects reasonable accessibility. The performance level in the moderate-income census tracts outweighs that of the low-income census tracts to support this conclusion.

Branch and ATM Distribution by Geography Income Level Dallas-Fort Worth MSA AA								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	149	9.9	619,198	9.2	0	0.0	0	0.0
Moderate	400	26.5	1,722,850	25.7	3	20.0	4	22.2
Middle	426	28.3	1,951,435	29.1	4	26.7	4	22.2
Upper	508	33.7	2,342,019	35.0	8	53.3	10	55.6
NA	24	1.6	59,564	0.9	0	0.0	0	0.0
Total	1,507	100.0	6,695,066	100.0	15	100.0	18	100.0
<i>Source: 2020 U.S. Census Data; Bank Data Due to rounding, totals may not equal 100.0.</i>								

The bank's alternative delivery systems and product offerings also demonstrate reasonable accessibility to essentially all portions of the AA. Bank OZK's distribution of ATMs in LMI census tracts reflects a similar distribution to that of the branches in the AA. Refer to the Service Test section at the institution level for specific details of other retail banking services available through alternative delivery systems offered, which remain accessible throughout all portions of the AA.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals in the Dallas-Fort Worth MSA AA. During the evaluation period, the bank opened two branches in middle- and upper-income census tracts in the Dallas-Fort Worth MSA AA. No branching changes occurred in LMI census tracts in the AA.

Reasonableness of Business Hours and Services

Services (including, where appropriate, business hours) do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals in the Dallas-Fort Worth MSA AA. The Dallas-Fort Worth MSA AA reflects product offerings, services, and branch hours consistent with the discussion at the institution level.

Community Development Services

The institution provides an adequate level of CD services in the Dallas-Fort Worth MSA AA. As seen in the table for the State of Texas, the bank provided 149 CD services since the previous evaluation in the Dallas-Fort Worth MSA AA. This represents 67.1 percent of the bank's total adequate level of CD services in the State of Texas and the Dallas-Fort Worth MSA AA contained 55.6 percent of the bank's total branches in the State of Texas. A significant majority of the activities focused on community services, which demonstrates the bank's responsiveness to an identified CD need. The current level reflects an increase from the 44 CD services in this AA at the prior evaluation.

The following lists an example of a CD service in the Dallas-Fort Worth MSA AA:

- ***Community Services*** – A bank officer served on the Board of Directors for a non-profit organization that provides math and reading tutoring and after school services to students of a local public school system. The majority of students in the district participate in the free and reduced school lunch program. The employee used expertise to aid in the financial aspects of the organization. Thus, the activities provide community services primarily to LMI individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions from the limited-scope reviews contributed to the institution's overall performance in the State of Texas.

Assessment Area	Lending Test	Investment Test	Service Test
Austin MSA AA	Below	Consistent	Consistent
Houston MSA AA	Below	Consistent	Consistent
San Antonio MSA AA	Below	Consistent	Consistent

Facts and data supporting conclusions for the AAs follows, including a summary of the institution's operations and activities, followed by geographic distribution and borrower profile tables by loan type. The appendices include demographic data for the limited-scope AAs.

Austin MSA AA

The Austin MSA AA consists of all census tracts in Caldwell, Travis, and Williamson Counties. The bank operates four branches in this AA with one located in a moderate-income census tract, one located in a middle-income census tract, and two located in upper-income census tracts. One branch, located in an upper-income census tract, opened during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	5	2,472
Home Mortgage Loans	4	3,427
Community Development Loans	13	109,711
Investments (New)	2	18,500
Investments (Prior Period)	7	11,009
Donations	14	128
CD Services	19	-
<i>Source: Bank Data</i>		

Houston MSA AA

The Houston MSA AA consists of all census tracts in Harris and Galveston Counties. The bank operates seven branches in this AA with three located in moderate-income census tracts and four located in upper-income census tracts. Four branches, two located in moderate-income census tracts and two located in upper-income census tracts, opened during the review period. In addition, one branch, located in a moderate-income census tract, closed during the review period. The branch distribution and availability of delivery systems is consistent with the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	11	3,974
Home Mortgage Loans	16	3,217
Community Development Loans	4	13,110
Investments (New)	3	11,126
Investments (Prior Period)	7	4,241
Donations	20	95
CD Services	44	-
<i>Source: Bank Data</i>		

San Antonio MSA AA

The San Antonio MSA AA consists of all census tracts in Bexar County. The bank operates one branch in this AA located in an upper-income census tract. No branches opened or closed during the review period. The branch distribution and availability of delivery systems is below the rated area conclusion. The product offerings, services, and branch hours are consistent with the rated area. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	\$(000s)
Small Business Loans	9	4,623
Home Mortgage Loans	9	2,782
Community Development Loans	2	726
Investments (New)	2	18,000
Investments (Prior Period)	5	17,476
Donations	8	58
CD Services	10	-
<i>Source: Bank Data</i>		

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Austin MSA	4	3,427	0.2	49,829	2.5	0	1.6	18.8	25	21.7	37.4	25	38.4	40.8	50	37.8	0.5	0	0.4
Houston MSA	16	3,217	0.7	86,353	6.4	31.3	5.4	23	37.5	18.2	30.6	18.8	34.1	39.2	12.5	41.6	1	0	0.8
San Antonio MSA	9	2,782	0.4	48,366	4.9	11.1	1.9	29.8	33.3	21.6	30.6	0	32	34.7	55.6	44.5	0	0	0

Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.

Small Business Loans

Assessment Area Distribution of Small Business Loans by Income Category of the Geography																			2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Austin MSA	5	2,472	0.3	68,921	2.9	0	3.4	14.6	0	17.9	30.2	60	30.4	48.2	40	46.4	4.1	0	2
Houston MSA	11	3,974	0.6	149,707	11.3	36.4	10.2	22.4	27.3	21.5	26.8	18.2	25.6	37.2	18.2	40.8	2.4	0	1.9
San Antonio MSA	9	4,623	0.5	41,376	5.9	11.1	5.6	25.2	33.3	24.3	25.1	11.1	23.8	43.6	44.4	46.2	0.2	0	0.2

Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Austin MSA	4	3,427	0.2	49,829	20.7	0	4.4	17.1	0	13.3	20.8	0	19.2	41.5	0	38	0	100	25.1
Houston MSA	16	3,217	0.7	86,353	26.4	0	4.1	17.5	0	13.3	17.7	12.5	19	38.4	31.3	38.5	0	56.3	25.2
San Antonio MSA	9	2,782	0.4	48,366	23.9	0	3.8	17.9	0	14.4	19.6	11.1	19.7	38.6	33.3	31.4	0	55.6	30.7

*Source: 2020 Census; 2024 Bank Data; 2024 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0.*

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Austin MSA	5	2,472	0.8	68,921	94.1	40	52.3	1.7	60	4.3	0	
Houston MSA	11	3,974	1.8	149,707	92.6	36.4	51.6	2.5	54.6	4.9	9.1	
San Antonio MSA	9	4,623	1.5	41,376	90.7	44.4	49.9	2.5	55.6	6.9	0	

*Source: 2023 D&B Data; 2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0.*

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

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

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

Investment Test

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

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

Service Test

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

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

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

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

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

SCOPE OF EVALUATION

Bank OZK	
<p>Scope of Examination: Full scope reviews were performed on the following AAs within the noted rated areas:</p> <ul style="list-style-type: none"> Texarkana MS MSA AA State of Arkansas: <ul style="list-style-type: none"> Little Rock MSA AA State of Florida: <ul style="list-style-type: none"> Bradenton MSA AA Tampa-St. Petersburg MSA AA State of Georgia: <ul style="list-style-type: none"> Atlanta-Marietta MSA AA State of North Carolina: <ul style="list-style-type: none"> Charlotte MSA AA State of Texas: <ul style="list-style-type: none"> Dallas-Fort Worth MSA AA 	
Time Period Reviewed:	7/11/2022 to 11/24/2025
<p>Products Reviewed: Home Mortgage Loans: (01/01/2022 – 12/31/2024) Small Business Loans: (01/01/2022 – 12/31/2024)</p>	

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Texarkana MS MSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Arkansas	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Florida	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Georgia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of North Carolina	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Texas	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

STATE OF ARKANSAS

Fayetteville MSA AA

The Fayetteville MSA AA consists of all of Benton and Washington Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Fayetteville MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	111	6.3	21.6	46.0	25.2	0.9
Population by Geography	530,204	5.7	20.4	43.5	29.8	0.6
Housing Units by Geography	204,074	5.4	20.2	43.9	29.7	0.8
Owner-Occupied Units by Geography	113,358	1.3	16.5	47.1	34.9	0.2
Occupied Rental Units by Geography	75,397	12.1	26.2	37.4	22.8	1.6
Vacant Units by Geography	15,319	3.4	18.6	52.0	25.2	0.8
Businesses by Geography	45,948	2.8	21.7	37.1	34.5	3.9
Farms by Geography	784	1.3	26.7	43.6	27.7	0.8
Family Distribution by Income Level	128,884	20.4	18.2	20.3	41.1	0.0
Household Distribution by Income Level	188,755	22.6	16.4	19.0	42.1	0.0
Median Family Income MSA – 22220 Fayetteville – Springdale – Rogers, AR MSA	\$75,899	Median Housing Value Median Gross Rent Families Below Poverty Level				\$196,160 \$895 8.4%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 39 institutions operated 202 offices within this AA. Of these institutions, Bank OZK ranked 5th with 4.4 percent deposit market share.

In 2024, the bank originated 113 reportable home mortgage loans totaling approximately \$22.2 million in the Fayetteville MSA AA. The bank captured 0.6 percent market share by total number and 0.4 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 42nd out of 446 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 17 reportable small business loans totaling approximately \$3.1 million in the Fayetteville MSA AA. The bank captured 0.1 percent market share of the total number and 0.6 percent market share of the total dollar volume of loans. The bank’s activity ranks 46th out of 114 lenders reporting small business loan originations and purchases inside the AA.

Fort Smith MSA AA

The Fort Smith MSA AA consists of all of Crawford and Sebastian Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Fort Smith MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	21.7	45.7	32.6	0.0
Population by Geography	187,932	0.0	23.7	43.2	33.1	0.0
Housing Units by Geography	84,080	0.0	23.3	43.1	33.6	0.0
Owner-Occupied Units by Geography	49,071	0.0	14.7	48.4	36.9	0.0
Occupied Rental Units by Geography	27,020	0.0	37.3	33.3	29.4	0.0
Vacant Units by Geography	7,989	0.0	28.8	44.0	27.2	0.0
Businesses by Geography	13,110	0.0	26.0	37.4	36.6	0.0
Farms by Geography	176	0.0	8.0	57.4	34.7	0.0
Family Distribution by Income Level	50,867	19.3	17.4	20.8	42.6	0.0
Household Distribution by Income Level	76,091	21.3	18.5	17.8	42.4	0.0
Median Family Income MSA - 22900 Fort Smith, AR-OK MSA	\$56,589	Median Housing Value Median Gross Rent Families Below Poverty Level			\$128,590 \$691 11.5%	
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 19 institutions operated 81 offices within this AA. Of these institutions, Bank OZK ranked 5th with 6.6 percent deposit market share.

In 2024, the bank originated 42 reportable home mortgage loans totaling approximately \$4.0 million in the Fort Smith MSA AA. The bank captured 0.9 percent market share by total number and 0.5 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 27th out of 214 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 17 reportable small business loans totaling approximately \$2.8 million in the Fort Smith MSA AA. The bank captured 0.5 percent market share of the total number and 1.7 percent market share of the total dollar volume of loans. The bank's activity ranks 20th out of 70 lenders reporting small business loan originations and purchases inside the AA.

Hot Springs MSA AA

The Hot Springs MSA AA consists of all of Garland County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Hot Springs MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	0.0	30.0	50.0	16.7	3.3
Population by Geography	100,180	0.0	26.6	52.4	18.8	2.3
Housing Units by Geography	50,974	0.0	28.7	51.9	17.3	2.1
Owner-Occupied Units by Geography	27,468	0.0	24.0	54.3	21.0	0.7
Occupied Rental Units by Geography	13,438	0.0	38.2	47.3	9.6	5.0
Vacant Units by Geography	10,068	0.0	29.1	51.3	17.2	2.4
Businesses by Geography	8,426	0.0	33.2	47.2	18.2	1.4
Farms by Geography	114	0.0	25.4	57.0	17.5	0.0
Family Distribution by Income Level	26,071	20.6	17.9	23.3	38.1	0.0
Household Distribution by Income Level	40,906	24.3	15.5	18.1	42.0	0.0
Median Family Income MSA - 26300 Hot Springs, AR MSA		\$60,892	Median Housing Value Median Gross Rent Families Below Poverty Level			\$142,044 \$726 11.2%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 14 institutions operated 45 offices within this AA. Of these institutions, Bank OZK ranked 2nd with 18.2 percent deposit market share.

In 2024, the bank originated 47 reportable home mortgage loans totaling approximately \$5.9 million in the Hot Springs MSA AA. The bank captured 1.9 percent market share by total number and 1.1 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 16th out of 235 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 24 reportable small business loans totaling approximately \$4.5 million in the Hot Springs MSA AA. The bank captured 1.0 percent market share of the total number and 5.0 percent market share of the total dollar volume of loans. The bank's activity ranks 15th out of 65 lenders reporting small business loan originations and purchases inside the AA.

AR Non-MSA AA

The AR Non-MSA AA consists of all of Baxter, Boone, Clark, Franklin, Hempstead, Hot Spring, Johnson, Logan, Marion, Newton, Pope, Searcy, and Van Buren Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area AR Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	0.0	13.5	64.0	22.5	0.0
Population by Geography	328,584	0.0	12.1	66.0	21.9	0.0
Housing Units by Geography	161,419	0.0	12.5	68.0	19.5	0.0
Owner-Occupied Units by Geography	96,395	0.0	8.6	69.9	21.5	0.0
Occupied Rental Units by Geography	34,380	0.0	20.8	60.2	19.0	0.0
Vacant Units by Geography	30,644	0.0	15.3	70.8	13.9	0.0
Businesses by Geography	23,649	0.0	13.7	50.2	36.1	0.0
Farms by Geography	879	0.0	5.7	67.6	26.7	0.0
Family Distribution by Income Level	86,975	18.6	19.6	20.8	41.0	0.0
Household Distribution by Income Level	130,775	22.0	17.4	18.0	42.7	0.0
Arkansas Non-MSA Median Family Income		\$53,596	Median Housing Value Median Gross Rent Families Below Poverty Level			\$117,832 \$640 11.3%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration for Searcy County on April 3, 2023, for a severe winter storm. In addition, FEMA issued disaster declarations on May 30, 2024, for Baxter, Boone, and Marion Counties and on May 21, 2025, for Hempstead, Hot Spring, Marion, Newton, and Searcy Counties for severe storms, straight-line winds, tornadoes, and flooding.

According to the FDIC Deposit Market Share data as of June 30, 2025, 38 institutions operated 144 offices within this AA. Of these institutions, Bank OZK ranked 1st with 12.4 percent deposit market share.

In 2024, the bank originated 134 reportable home mortgage loans totaling approximately \$13.2 million in the AR Non-MSA AA. The bank captured 1.9 percent market share by total number and 1.1 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 11th out of 313 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 46 reportable small business loans totaling approximately \$10.4 million in the AR Non-MSA AA. The bank captured 0.8 percent market share of the total number and 4.2 percent market share of the total dollar volume of loans. The bank's activity ranks 20th out of 98 lenders reporting small business loan originations and purchases inside the AA.

STATE OF FLORIDA

Cape Coral MSA AA

The Cape Coral MSA AA consists of all of Lee County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Cape Coral MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	223	2.2	21.5	44.4	29.6	2.2
Population by Geography	760,822	2.3	23.7	46.7	26.4	0.8
Housing Units by Geography	401,252	1.7	20.3	44.9	32.2	0.9
Owner-Occupied Units by Geography	209,905	1.0	17.1	49.6	32.1	0.2
Occupied Rental Units by Geography	79,011	4.7	36.5	40.3	18.1	0.4
Vacant Units by Geography	112,336	1.1	14.9	39.4	42.3	2.4
Businesses by Geography	128,367	2.3	24.6	44.7	27.9	0.5
Farms by Geography	758	0.8	14.5	38.3	46.2	0.3
Family Distribution by Income Level	187,877	19.3	19.0	20.8	40.9	0.0
Household Distribution by Income Level	288,916	22.3	17.0	19.3	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA	\$71,043	Median Housing Value Median Gross Rent Families Below Poverty Level				\$264,556 \$1,252 7.9%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued disaster declarations for the following hurricanes affecting the AA: Hurricane Ian (September 29, 2022), Hurricane Helene (September 28, 2024), and Hurricane Milton (October 11, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 33 institutions operated 160 offices within this AA. Of these institutions, Bank OZK ranked 10th with 2.9 percent deposit market share.

In 2024, the bank originated 14 reportable home mortgage loans totaling approximately \$2.6 million in the Cape Coral MSA AA. The bank captured 0.1 percent market share by total number and 0.03 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 196th out of 832 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 8 reportable small business loans totaling approximately \$1.2 million in the Cape Coral MSA AA. The bank captured 0.03 percent market share of the total number and 0.2 percent market share of the total dollar volume of loans. The bank's activity ranks 58th out of 158 lenders reporting small business loan originations and purchases inside the AA.

Fort Lauderdale MD AA

The Fort Lauderdale MD AA consists of all of Broward County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Fort Lauderdale MD AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	417	4.8	28.8	30.0	34.5	1.9
Population by Geography	1,944,375	3.7	30.1	29.6	35.5	1.1
Housing Units by Geography	826,382	4.5	30.2	29.2	34.8	1.3
Owner-Occupied Units by Geography	442,633	3.6	25.3	28.7	41.5	1.0
Occupied Rental Units by Geography	262,309	6.1	38.3	31.2	23.1	1.4
Vacant Units by Geography	121,440	4.8	30.8	26.5	36.0	1.9
Businesses by Geography	503,984	2.3	26.8	29.6	40.3	1.0
Farms by Geography	1,401	1.2	16.2	27.2	55.0	0.4
Family Distribution by Income Level	447,453	21.8	18.3	18.1	41.8	0.0
Household Distribution by Income Level	704,942	23.6	16.8	17.4	42.1	0.0
Median Family Income MD - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL MD		\$73,430	Median Housing Value Median Gross Rent Families Below Poverty Level			\$291,831 \$1,475 9.7%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration for the AA on April 27, 2023, for severe storms, tornadoes, and flooding.

According to the FDIC Deposit Market Share data as of June 30, 2025, 44 institutions operated 369 offices within this AA. Of these institutions, Bank OZK ranked 32nd with 0.2 percent deposit market share.

In 2024, the bank originated 10 reportable home mortgage loans totaling approximately \$4.7 million in the Fort Lauderdale MD AA. The bank captured 0.03 percent market share by total number and 0.03 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 256th out of 682 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 3 reportable small business loans totaling approximately \$1.4 million in the Fort Lauderdale MD AA. The bank captured 0.00 percent market share of the total number and 0.1 percent market share of the total dollar volume of loans. The bank's activity ranks 99th out of 183 lenders reporting small business loan originations and purchases inside the AA.

Jacksonville MSA AA

The Jacksonville MSA AA consists of all of Duval County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Jacksonville MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	219	10.1	31.5	33.3	23.3	1.8
Population by Geography	995,567	7.9	31.6	35.9	23.7	0.9
Housing Units by Geography	413,084	8.7	32.0	34.3	24.2	0.9
Owner-Occupied Units by Geography	211,163	5.8	25.3	36.8	31.4	0.7
Occupied Rental Units by Geography	158,541	11.1	39.8	32.1	15.9	1.2
Vacant Units by Geography	43,380	13.7	36.1	30.1	19.4	0.7
Businesses by Geography	166,058	7.3	27.2	36.4	26.4	2.7
Farms by Geography	592	3.7	18.6	37.7	35.6	4.4
Family Distribution by Income Level	225,060	24.5	19.7	19.8	36.1	0.0
Household Distribution by Income Level	369,704	26.0	18.0	19.1	36.9	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA	\$76,537	Median Housing Value Median Gross Rent Families Below Poverty Level				\$199,982 \$1,107 10.7%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued disaster declarations for the following hurricanes affecting the AA: Hurricane Ian (September 29, 2022), Hurricane Nicole (December 13, 2022), Hurricane Idalia (August 31, 2023), Hurricane Debby (August 10, 2024), Hurricane Helene (September 28, 2024), and Hurricane Milton (October 11, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 29 institutions operated 152 offices within this AA. Of these institutions, Bank OZK ranked 15th with 0.3 percent deposit market share.

In 2024, the bank originated 7 reportable home mortgage loans totaling approximately \$546 thousand in the Jacksonville MSA AA. The bank captured 0.03 percent market share by total number and 0.01 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 235th out of 555 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 4 reportable small business loans totaling approximately \$2.1 million in the Jacksonville MSA AA. The bank captured 0.01 percent market share of the total number and 0.3 percent market share of the total dollar volume of loans. The bank's activity ranks 70th out of 128 lenders reporting small business loan originations and purchases inside the AA.

Miami MD AA

The Miami MD AA consists of all of Miami-Dade County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Miami MD AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	707	4.8	24.9	31.3	34.4	4.7
Population by Geography	2,701,767	4.8	26.1	32.3	34.7	2.1
Housing Units by Geography	1,032,310	4.7	25.8	31.4	36.4	1.8
Owner-Occupied Units by Geography	465,833	2.0	18.3	33.1	45.3	1.3
Occupied Rental Units by Geography	436,367	8.0	36.6	31.5	21.7	2.2
Vacant Units by Geography	130,110	3.0	16.3	24.8	53.2	2.6
Businesses by Geography	665,621	2.1	19.8	27.1	47.8	3.2
Farms by Geography	1,968	1.8	14.5	18.5	62.7	2.5
Family Distribution by Income Level	619,475	23.1	17.3	17.7	42.0	0.0
Household Distribution by Income Level	902,200	25.9	15.1	16.1	42.8	0.0
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL MD		\$60,666	Median Housing Value Median Gross Rent Families Below Poverty Level			\$346,191 \$1,408 12.7%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 57 institutions operated 582 offices within this AA. Of these institutions, Bank OZK ranked 36th with 0.4 percent deposit market share.

In 2024, the bank originated 10 reportable home mortgage loans totaling approximately \$3.9 million in the Miami MD AA. The bank captured 0.02 percent market share by total number and 0.02 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 240th out of 622 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 16 reportable small business loans totaling approximately \$2.7 million in the Miami MD AA. The bank captured 0.01 percent market share of the total number and 0.1 percent market share of the total dollar volume of loans. The bank's activity ranks 72nd out of 166 lenders reporting small business loan originations and purchases inside the AA.

Ocala MSA AA

The Ocala MSA AA consists of all of Marion County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Ocala MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	1.1	20.4	54.8	19.4	4.3
Population by Geography	375,908	1.4	19.4	58.3	20.1	0.9
Housing Units by Geography	170,926	1.4	19.5	58.6	19.5	0.9
Owner-Occupied Units by Geography	109,169	0.3	16.7	61.7	20.3	1.1
Occupied Rental Units by Geography	36,694	5.0	25.6	52.4	16.6	0.4
Vacant Units by Geography	25,063	0.6	22.9	54.6	20.7	1.2
Businesses by Geography	44,373	1.6	21.7	55.7	20.5	0.5
Farms by Geography	1,005	0.0	29.9	42.6	26.7	0.9
Family Distribution by Income Level	94,676	18.0	19.8	22.1	40.2	0.0
Household Distribution by Income Level	145,863	22.1	17.0	19.6	41.3	0.0
Median Family Income MSA - 36100 Ocala, FL MSA		\$56,181	Median Housing Value Median Gross Rent Families Below Poverty Level			\$150,910 \$895 10.7%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued disaster declarations for the following hurricanes affecting the AA: Hurricane Helene (September 28, 2024) and Hurricane Milton (October 11, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 22 institutions operated 66 offices within this AA. Of these institutions, Bank OZK ranked 7th with 5.1 percent deposit market share.

In 2024, the bank originated 10 reportable home mortgage loans totaling approximately \$856 thousand in the Ocala MSA AA. The bank captured 0.1 percent market share by total number and 0.1 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 171st out of 548 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 2 reportable small business loans totaling approximately \$872 thousand in the Ocala MSA AA. The bank captured 0.02 percent market share of the total number and 0.4 percent market share of the total dollar volume of loans. The bank's activity ranks 59th out of 90 lenders reporting small business loan originations and purchases inside the AA.

Punta Gorda MSA AA

The Punta Gorda MSA AA consists of all of Charlotte County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Punta Gorda MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	17.0	61.7	19.2	2.1
Population by Geography	186,847	0.0	16.5	66.7	16.8	0.0
Housing Units by Geography	105,857	0.0	16.8	65.5	17.7	0.0
Owner-Occupied Units by Geography	65,110	0.0	14.8	67.2	18.0	0.0
Occupied Rental Units by Geography	14,679	0.0	30.5	59.1	10.4	0.0
Vacant Units by Geography	26,068	0.0	14.0	64.8	21.2	0.0
Businesses by Geography	28,804	0.0	17.8	64.3	18.0	0.0
Farms by Geography	219	0.0	14.2	31.5	54.3	0.0
Family Distribution by Income Level	51,016	16.7	20.4	22.8	40.1	0.0
Household Distribution by Income Level	79,789	21.3	17.4	20.8	40.6	0.0
Median Family Income MSA - 39460 Punta Gorda, FL MSA		\$63,887	Median Housing Value Median Gross Rent Families Below Poverty Level			\$230,785 \$1,050 7.4%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued disaster declarations for the following hurricanes affecting the AA: Hurricane Ian (September 29, 2022), Hurricane Idalia (August 31, 2023), Hurricane Debby (August 10, 2024), Hurricane Helene (September 28, 2024), and Hurricane Milton (October 11, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 12 institutions operated 40 offices within this AA. Of these institutions, Bank OZK ranked 5th with 8.4 percent deposit market share.

In 2024, the bank originated 11 reportable home mortgage loans totaling approximately \$3.8 million in the Punta Gorda MSA AA. The bank captured 0.1 percent market share by total number and 0.6 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 51st out of 86 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$25 thousand in the Punta Gorda MSA AA. The bank captured 0.02 percent market share of the total number and 0.02 percent market share of the total dollar volume of loans. The bank's activity ranks 92nd out of 96 lenders reporting small business loan originations and purchases inside the AA.

STATE OF GEORGIA

Athens MSA AA

The Athens MSA AA consists of all of Clarke and Oconee Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Athens MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	11.1	22.2	20.0	46.7	0.0
Population by Geography	170,470	14.1	21.9	20.5	43.6	0.0
Housing Units by Geography	68,030	11.8	23.0	22.1	43.1	0.0
Owner-Occupied Units by Geography	31,762	6.2	14.3	24.5	54.9	0.0
Occupied Rental Units by Geography	32,295	16.9	31.3	20.0	31.7	0.0
Vacant Units by Geography	3,973	14.9	23.9	19.9	41.3	0.0
Businesses by Geography	18,448	9.1	18.0	20.8	52.1	0.0
Farms by Geography	334	2.7	11.4	18.6	67.4	0.0
Family Distribution by Income Level	35,535	23.3	15.8	15.2	45.7	0.0
Household Distribution by Income Level	64,057	27.8	14.7	15.1	42.3	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$71,301	Median Housing Value Median Gross Rent Families Below Poverty Level			\$227,463 \$881 10.5%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 19 institutions operated 40 offices within this AA. Of these institutions, Bank OZK ranked 7th with 4.1 percent deposit market share.

In 2024, the bank originated 21 reportable home mortgage loans totaling approximately \$5.9 million in the Athens MSA AA. The bank captured 0.6 percent market share by total number and 0.5 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 38th out of 287 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 5 reportable small business loans totaling approximately \$841 thousand in the Athens MSA AA. The bank captured 0.1 percent market share of the total number and 0.6 percent market share of the total dollar volume of loans. The bank's activity ranks 32nd out of 70 lenders reporting small business loan originations and purchases inside the AA.

Brunswick MSA AA

The Brunswick MSA AA consists of all of Glynn County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Brunswick MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	3.9	26.9	30.8	30.8	7.7
Population by Geography	84,499	4.3	31.0	34.0	29.2	1.5
Housing Units by Geography	43,486	4.1	29.3	33.7	31.0	1.9
Owner-Occupied Units by Geography	22,228	1.6	22.1	38.2	36.5	1.7
Occupied Rental Units by Geography	11,963	10.1	48.5	26.1	14.6	0.7
Vacant Units by Geography	9,295	2.5	21.8	32.9	39.1	3.8
Businesses by Geography	8,959	11.2	33.4	24.5	27.9	3.1
Farms by Geography	68	5.9	17.7	30.9	38.2	7.4
Family Distribution by Income Level	22,560	23.8	14.6	17.7	43.9	0.0
Household Distribution by Income Level	34,191	22.3	15.1	17.7	44.9	0.0
Median Family Income MSA - 15260 Brunswick-St. Simons, GA MSA		\$68,432	Median Housing Value Median Gross Rent Families Below Poverty Level			\$219,411 \$930 13.2%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued disaster declarations for the following hurricanes affecting the AA: Hurricane Idalia (September 7, 2023) and Hurricane Helene (September 30, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 14 institutions operated 28 offices within this AA. Of these institutions, Bank OZK ranked 8th with 5.7 percent deposit market share.

In 2024, the bank originated 10 reportable home mortgage loans totaling approximately \$4.3 million in the Brunswick MSA AA. The bank captured 0.5 percent market share by total number and 0.5 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 44th out of 236 lenders reporting home mortgage loans inside the AA.

In 2023, the bank did not originate any reportable small business loans in the Brunswick MSA AA.

Columbus MSA AA

The Columbus MSA AA consists of all of Muscogee County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Columbus MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	59	15.3	28.8	23.7	28.8	3.4
Population by Geography	206,922	8.9	25.1	31.2	32.6	2.2
Housing Units by Geography	85,012	9.9	26.2	31.1	31.1	1.7
Owner-Occupied Units by Geography	36,142	4.0	23.7	32.2	40.0	0.2
Occupied Rental Units by Geography	37,506	12.9	26.7	31.8	25.5	3.1
Vacant Units by Geography	11,364	19.0	32.9	25.3	20.9	1.9
Businesses by Geography	21,354	9.5	23.5	30.3	35.7	1.0
Farms by Geography	105	5.7	5.7	30.5	58.1	0.0
Family Distribution by Income Level	44,873	25.1	15.7	17.4	41.8	0.0
Household Distribution by Income Level	73,648	26.6	16.0	15.7	41.7	0.0
Median Family Income MSA - 17980 Columbus, GA-AL MSA		\$62,459	Median Housing Value Median Gross Rent Families Below Poverty Level			\$133,864 \$932 15.0%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 11 institutions operated 31 offices within this AA. Of these institutions, Bank OZK ranked 8th with 1.2 percent deposit market share.

In 2024, the bank originated 6 reportable home mortgage loans totaling approximately \$5.4 million in the Columbus MSA AA. The bank captured 0.2 percent market share by total number and 0.6 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 72nd out of 267 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$908 thousand in the Columbus MSA AA. The bank captured 0.03 percent market share of the total number and 0.7 percent market share of the total dollar volume of loans. The bank's activity ranks 58th out of 70 lenders reporting small business loan originations and purchases inside the AA.

Dalton MSA AA

The Dalton MSA AA consists of all of Murray and Whitfield Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Dalton MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	18.8	68.8	12.5	0.0
Population by Geography	142,837	0.0	20.9	66.3	12.8	0.0
Housing Units by Geography	56,425	0.0	19.7	67.7	12.6	0.0
Owner-Occupied Units by Geography	34,206	0.0	13.6	71.6	14.8	0.0
Occupied Rental Units by Geography	16,726	0.0	28.6	62.4	9.0	0.0
Vacant Units by Geography	5,493	0.0	30.6	59.2	10.3	0.0
Businesses by Geography	10,374	0.0	35.4	47.9	16.8	0.0
Farms by Geography	239	0.0	18.0	74.1	8.0	0.0
Family Distribution by Income Level	36,995	18.5	20.0	22.0	39.5	0.0
Household Distribution by Income Level	50,932	22.0	18.5	18.5	41.0	0.0
Median Family Income MSA - 19140 Dalton, GA MSA		\$58,145	Median Housing Value Median Gross Rent Families Below Poverty Level			\$132,741 \$723 11.5%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 10 institutions operated 25 offices within this AA. Of these institutions, Bank OZK ranked 3rd with 13.3 percent deposit market share.

In 2024, the bank originated 18 reportable home mortgage loans totaling approximately \$2.5 million in the Dalton MSA AA. The bank captured 0.7 percent market share by total number and 0.4 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 36th out of 215 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 6 reportable small business loans totaling approximately \$2.1 million in the Dalton MSA AA. The bank captured 0.3 percent market share of the total number and 2.8 percent market share of the total dollar volume of loans. The bank's activity ranks 25th out of 69 lenders reporting small business loan originations and purchases inside the AA.

Gainesville MSA AA

The Gainesville MSA AA consists of all of Hall County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Gainesville MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	8.0	12.0	50.0	26.0	4.0
Population by Geography	203,136	7.4	12.1	51.7	26.1	2.7
Housing Units by Geography	74,544	6.7	11.0	53.2	25.9	3.2
Owner-Occupied Units by Geography	45,199	2.0	9.3	52.2	33.7	2.7
Occupied Rental Units by Geography	20,356	17.5	13.4	54.3	11.1	3.7
Vacant Units by Geography	8,989	5.6	14.0	55.7	20.4	4.3
Businesses by Geography	17,943	8.6	13.4	48.4	26.6	3.0
Farms by Geography	269	1.1	8.2	70.6	18.2	1.9
Family Distribution by Income Level	49,002	20.3	18.5	20.1	41.0	0.0
Household Distribution by Income Level	65,555	21.8	17.0	19.0	42.1	0.0
Median Family Income MSA - 23580 Gainesville, GA MSA		\$74,139	Median Housing Value Median Gross Rent Families Below Poverty Level			\$213,562 \$1,055 10.3%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 15 institutions operated 37 offices within this AA. Of these institutions, Bank OZK ranked 8th with 3.1 percent deposit market share.

In 2024, the bank originated 27 reportable home mortgage loans totaling approximately \$8.5 million in the Gainesville MSA AA. The bank captured 0.5 percent market share by total number and 0.4 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 40th out of 327 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 4 reportable small business loans totaling approximately \$1.2 million in the Gainesville MSA AA. The bank captured 0.1 percent market share of the total number and 0.6 percent market share of the total dollar volume of loans. The bank's activity ranks 45th out of 88 lenders reporting small business loan originations and purchases inside the AA.

Macon MSA AA

The Macon MSA AA consists of all of Bibb County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Macon MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	22.9	18.8	20.8	31.3	6.3
Population by Geography	157,346	21.0	18.2	21.9	34.9	4.1
Housing Units by Geography	70,138	22.6	17.7	19.4	35.6	4.8
Owner-Occupied Units by Geography	30,091	13.7	14.3	26.0	44.0	2.1
Occupied Rental Units by Geography	28,063	25.6	18.9	16.5	32.2	6.8
Vacant Units by Geography	11,984	37.8	23.6	9.5	22.5	6.8
Businesses by Geography	17,725	14.5	23.3	19.9	34.9	7.3
Farms by Geography	156	1.3	11.5	16.0	69.2	1.9
Family Distribution by Income Level	34,635	28.9	15.9	17.0	38.2	0.0
Household Distribution by Income Level	58,154	29.7	15.5	15.1	39.6	0.0
Median Family Income MSA - 31420 Macon-Bibb County, GA MSA	\$62,540	Median Housing Value Median Gross Rent Families Below Poverty Level				\$119,970 \$828 19.3%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 14 institutions operated 36 offices within this AA. Of these institutions, Bank OZK ranked 6th with 6.2 percent deposit market share.

In 2024, the bank originated 39 reportable home mortgage loans totaling approximately \$4.1 million in the Macon MSA AA. The bank captured 1.2 percent market share by total number and 0.5 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 20th out of 273 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$5 thousand in the Macon MSA AA. The bank captured 0.03 percent market share of the total number and 0.00 percent market share of the total dollar volume of loans. The bank's activity ranks 70th out of 71 lenders reporting small business loan originations and purchases inside the AA.

GA Non-MSA AA

The GA Non-MSA AA consists of all of Decatur, Fannin, Gilmer, Gordon, Grady, Habersham, Jackson, and Union Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area GA Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	80	0.0	10.0	47.5	41.3	1.3
Population by Geography	316,389	0.0	10.3	47.9	40.8	1.0
Housing Units by Geography	140,131	0.0	8.7	53.2	37.1	1.0
Owner-Occupied Units by Geography	82,729	0.0	6.5	50.6	42.0	0.9
Occupied Rental Units by Geography	29,871	0.0	16.6	49.8	31.8	1.7
Vacant Units by Geography	27,531	0.0	6.5	64.8	28.2	0.5
Businesses by Geography	24,843	0.0	8.5	55.1	35.9	0.5
Farms by Geography	1,048	0.0	3.5	66.4	29.2	0.9
Family Distribution by Income Level	80,636	17.1	16.0	18.7	48.1	0.0
Household Distribution by Income Level	112,600	19.9	13.6	16.6	50.0	0.0
Georgia Non-MSA Median Family Income		\$55,981	Median Housing Value Median Gross Rent Families Below Poverty Level			\$174,267 \$757 10.3%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on September 30, 2024, for Decatur and Jackson Counties due to Hurricane Helene.

According to the FDIC Deposit Market Share data as of June 30, 2025, 26 institutions operated 66 offices within this AA. Of these institutions, Bank OZK ranked 2nd with 16.7 percent deposit market share.

In 2024, the bank originated 115 reportable home mortgage loans totaling approximately \$23.9 million in the GA Non-MSA AA. The bank captured 1.1 percent market share by total number and 0.7 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 22nd out of 472 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 14 reportable small business loans totaling approximately \$1.8 million in the GA Non-MSA AA. The bank captured 0.2 percent market share of the total number and 0.9 percent market share of the total dollar volume of loans. The bank's activity ranks 25th out of 88 lenders reporting small business loan originations and purchases inside the AA.

Rome MSA AA

The Rome MSA AA consists of all of Floyd County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Rome MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	26.9	38.5	30.8	3.9
Population by Geography	98,584	0.0	26.9	40.0	31.2	1.9
Housing Units by Geography	40,713	0.0	28.6	38.1	31.6	1.7
Owner-Occupied Units by Geography	22,616	0.0	18.6	39.9	39.1	2.4
Occupied Rental Units by Geography	13,576	0.0	43.0	36.9	18.9	1.2
Vacant Units by Geography	4,521	0.0	35.6	32.6	31.8	0.0
Businesses by Geography	9,121	0.0	45.8	25.2	28.1	0.9
Farms by Geography	172	0.0	17.4	34.9	41.3	6.4
Family Distribution by Income Level	25,405	23.4	16.4	20.0	40.2	0.0
Household Distribution by Income Level	36,192	23.3	19.3	15.3	42.1	0.0
Median Family Income MSA - 40660 Rome, GA MSA		\$61,841	Median Housing Value Median Gross Rent Families Below Poverty Level			\$139,298 \$780 14.0%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 8 institutions operated 13 offices within this AA. Of these institutions, Bank OZK ranked 2nd with 15.8 percent deposit market share.

In 2024, the bank originated 14 reportable home mortgage loans totaling approximately \$2.0 million in the Rome MSA AA. The bank captured 0.6 percent market share by total number and 0.3 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 41st out of 233 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$222 thousand in the Rome MSA AA. The bank captured 0.1 percent market share of the total number and 0.4 percent market share of the total dollar volume of loans. The bank's activity ranks 46th out of 56 lenders reporting small business loan originations and purchases inside the AA.

Savannah MSA AA

The Savannah MSA AA consists of all of Chatham County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Savannah MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	88	10.2	34.1	26.1	23.9	5.7
Population by Geography	295,291	10.1	31.0	33.4	22.7	2.8
Housing Units by Geography	126,234	9.9	31.7	30.8	25.9	1.7
Owner-Occupied Units by Geography	61,038	5.7	24.9	34.5	33.4	1.6
Occupied Rental Units by Geography	48,830	14.0	40.8	28.5	15.3	1.4
Vacant Units by Geography	16,366	13.4	29.9	24.0	29.9	2.8
Businesses by Geography	36,325	12.2	36.7	28.5	20.5	2.1
Farms by Geography	175	5.1	32.0	26.3	35.4	1.1
Family Distribution by Income Level	66,947	24.3	18.3	18.4	39.0	0.0
Household Distribution by Income Level	109,868	24.6	17.5	17.3	40.6	0.0
Median Family Income MSA - 42340 Savannah, GA MSA		\$75,128	Median Housing Value Median Gross Rent Families Below Poverty Level			\$231,922 \$1,097 10.2%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued a disaster declaration on September 24, 2024, for the AA due to Tropical Storm Debby.

According to the FDIC Deposit Market Share data as of June 30, 2025, 20 institutions operated 65 offices within this AA. Of these institutions, Bank OZK ranked 11th with 2.2 percent deposit market share.

In 2024, the bank originated 31 reportable home mortgage loans totaling approximately \$11.1 million in the Savannah MSA AA. The bank captured 0.4 percent market share by total number and 0.3 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 50th out of 410 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$350 thousand in the Savannah MSA AA. The bank captured 0.01 percent market share of the total number and 0.1 percent market share of the total dollar volume of loans. The bank's activity ranks 74th out of 87 lenders reporting small business loan originations and purchases inside the AA.

Valdosta MSA AA

The Valdosta MSA AA consists of all of Lowndes County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Valdosta MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	29	13.8	24.1	24.1	34.5	3.5
Population by Geography	118,251	10.9	22.4	28.1	37.0	1.6
Housing Units by Geography	48,525	13.3	23.7	26.2	35.3	1.6
Owner-Occupied Units by Geography	22,454	7.5	14.1	32.7	44.7	1.0
Occupied Rental Units by Geography	20,301	18.3	34.0	20.2	25.4	2.2
Vacant Units by Geography	5,770	18.4	25.0	21.4	33.9	1.4
Businesses by Geography	12,208	14.8	25.0	19.9	39.8	0.6
Farms by Geography	266	5.6	16.5	36.5	40.6	0.8
Family Distribution by Income Level	26,870	24.1	14.9	18.1	42.9	0.0
Household Distribution by Income Level	42,755	27.1	14.0	13.4	45.5	0.0
Median Family Income MSA - 46660 Valdosta, GA MSA		\$59,281	Median Housing Value Median Gross Rent Families Below Poverty Level			\$131,932 \$834 16.6%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued disaster declarations for the AA resulting from the following hurricanes/tropical storms: Hurricane Idalia (September 7, 2023), Tropical Storm Debby (September 24, 2024), and Hurricane Helene (September 30, 2024).

According to the FDIC Deposit Market Share data as of June 30, 2025, 13 institutions operated 31 offices within this AA. Of these institutions, Bank OZK ranked 6th with 7.8 percent deposit market share.

In 2024, the bank originated 28 reportable home mortgage loans totaling approximately \$2.7 million in the Valdosta MSA AA. The bank captured 0.9 percent market share by total number and 0.4 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 28th out of 222 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 5 reportable small business loans totaling approximately \$554 thousand in the Valdosta MSA AA. The bank captured 0.2 percent market share of the total number and 0.8 percent market share of the total dollar volume of loans. The bank's activity ranks 28th out of 59 lenders reporting small business loan originations and purchases inside the AA.

STATE OF NORTH CAROLINA

Greensboro MSA AA

The Greensboro MSA AA consists of all of Randolph County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Greensboro MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	2.9	35.3	52.9	8.8	0.0
Population by Geography	144,171	2.2	30.3	58.9	8.6	0.0
Housing Units by Geography	62,670	2.0	31.5	57.9	8.7	0.0
Owner-Occupied Units by Geography	41,432	0.9	25.0	63.3	10.8	0.0
Occupied Rental Units by Geography	15,358	4.5	47.0	44.2	4.4	0.0
Vacant Units by Geography	5,880	3.4	36.2	55.5	5.0	0.0
Businesses by Geography	11,611	2.7	36.2	52.6	8.6	0.0
Farms by Geography	373	0.5	12.1	82.3	5.1	0.0
Family Distribution by Income Level	39,042	22.4	22.3	20.5	34.7	0.0
Household Distribution by Income Level	56,790	24.8	17.4	20.6	37.2	0.0
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA	\$65,831	Median Housing Value Median Gross Rent Families Below Poverty Level				\$129,523 \$691 11.5%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 11 institutions operated 23 offices within this AA. Of these institutions, Bank OZK ranked 8th with 3.9 percent deposit market share.

In 2024, the bank originated 7 reportable home mortgage loans totaling approximately \$1.0 million in the Greensboro MSA AA. The bank captured 0.2 percent market share by total number and 0.2 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 69th out of 235 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 3 reportable small business loans totaling approximately \$269 thousand in the Greensboro MSA AA. The bank captured 0.1 percent market share of the total number and 0.3 percent market share of the total dollar volume of loans. The bank's activity ranks 41st out of 79 lenders reporting small business loan originations and purchases inside the AA.

NC Non-MSA AA

The NC Non-MSA AA consists of all of Cleveland and Rutherford Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area NC Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	2.2	19.6	65.2	13.0	0.0
Population by Geography	163,963	2.2	21.3	64.4	12.2	0.0
Housing Units by Geography	78,196	2.1	21.5	64.3	12.1	0.0
Owner-Occupied Units by Geography	44,384	1.1	17.9	69.7	11.3	0.0
Occupied Rental Units by Geography	19,230	4.0	31.3	53.1	11.5	0.0
Vacant Units by Geography	14,582	2.8	19.4	62.8	15.1	0.0
Businesses by Geography	12,205	4.0	24.9	54.5	16.7	0.0
Farms by Geography	365	0.8	14.5	72.3	12.3	0.0
Family Distribution by Income Level	41,929	23.4	19.9	19.4	37.4	0.0
Household Distribution by Income Level	63,614	26.9	15.5	18.0	39.7	0.0
North Carolina Non-MSA Median Family Income	\$58,337	Median Housing Value Median Gross Rent Families Below Poverty Level				\$134,061 \$682 14.0%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on September 28, 2024, for both counties in the AA due to Tropical Storm Helene.

According to the FDIC Deposit Market Share data as of June 30, 2025, 12 institutions operated 27 offices within this AA. Of these institutions, Bank OZK ranked 1st with 26.6 percent deposit market share.

In 2024, the bank originated 34 reportable home mortgage loans totaling approximately \$3.6 million in the NC Non-MSA AA. The bank captured 0.9 percent market share by total number and 0.5 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 26th out of 264 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 24 reportable small business loans totaling approximately \$7.1 million in the NC Non-MSA AA. The bank captured 0.9 percent market share of the total number and 8.6 percent market share of the total dollar volume of loans. The bank's activity ranks 18th out of 66 lenders reporting small business loan originations and purchases inside the AA.

Wilmington MSA AA

The Wilmington MSA AA consists of all of New Hanover County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Wilmington MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	7.3	27.3	23.6	36.4	5.5
Population by Geography	225,702	4.6	25.1	27.9	39.9	2.4
Housing Units by Geography	113,125	5.6	25.4	27.6	40.5	0.8
Owner-Occupied Units by Geography	57,212	2.3	19.7	27.2	49.9	0.9
Occupied Rental Units by Geography	40,786	10.3	36.3	28.4	24.2	0.8
Vacant Units by Geography	15,127	5.4	17.5	27.1	49.4	0.6
Businesses by Geography	36,739	4.8	23.0	20.2	51.3	0.7
Farms by Geography	280	0.7	20.0	18.9	60.0	0.4
Family Distribution by Income Level	54,049	21.0	16.9	18.1	44.0	0.0
Household Distribution by Income Level	97,998	25.7	15.7	17.3	41.3	0.0
Median Family Income MSA - 48900 Wilmington, NC MSA		\$75,808	Median Housing Value Median Gross Rent Families Below Poverty Level			\$276,572 \$1,403 8.4%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 22 institutions operated 55 offices within this AA. Of these institutions, Bank OZK ranked 10th with 0.7 percent deposit market share.

In 2024, the bank originated 2 reportable home mortgage loans totaling approximately \$540 thousand in the Wilmington MSA AA. The bank captured 0.03 percent market share by total number and 0.02 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 220th out of 382 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 1 reportable small business loan totaling approximately \$80 thousand in the Wilmington MSA AA. The bank captured 0.01 percent market share of the total number and 0.03 percent market share of the total dollar volume of loans. The bank's activity ranks 80th out of 85 lenders reporting small business loan originations and purchases inside the AA.

Winston-Salem MSA AA

The Winston-Salem MSA AA consists of all of Davidson, Davie, and Forsyth Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Winston-Salem MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	147	10.2	15.7	46.9	27.2	0.0
Population by Geography	594,232	7.3	16.6	46.6	29.5	0.0
Housing Units by Geography	261,228	7.2	17.3	47.6	28.0	0.0
Owner-Occupied Units by Geography	154,772	3.4	12.3	49.9	34.3	0.0
Occupied Rental Units by Geography	77,976	13.6	25.5	42.6	18.4	0.0
Vacant Units by Geography	28,480	10.0	21.5	48.6	19.9	0.0
Businesses by Geography	60,990	5.8	16.4	41.8	36.1	0.0
Farms by Geography	807	1.5	8.9	55.9	33.7	0.0
Family Distribution by Income Level	151,287	21.6	16.9	19.9	41.6	0.0
Household Distribution by Income Level	232,748	23.6	16.5	17.2	42.7	0.0
Median Family Income MSA - 49180 Winston-Salem, NC MSA	\$66,563	Median Housing Value Median Gross Rent Families Below Poverty Level				\$164,492 \$816 11.1%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the FDIC Deposit Market Share data as of June 30, 2025, 22 institutions operated 114 offices within this AA. Of these institutions, Bank OZK ranked 9th with 2.9 percent deposit market share.

In 2024, the bank originated 48 reportable home mortgage loans totaling approximately \$8.2 million in the Winston-Salem MSA AA. The bank captured 0.3 percent market share by total number and 0.2 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 59th out of 441 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 30 reportable small business loans totaling approximately \$4.2 million in the Winston-Salem MSA AA. The bank captured 0.3 percent market share of the total number and 1.0 percent market share of the total dollar volume of loans. The bank's activity ranks 18th out of 66 lenders reporting small business loan originations and purchases inside the AA.

STATE OF TEXAS

Austin MSA AA

The Austin MSA AA consists of all of Caldwell, Travis, and Williamson Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Austin MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	436	6.2	24.8	33.3	32.1	3.7
Population by Geography	1,945,088	5.9	23.7	34.7	33.3	2.3
Housing Units by Geography	744,455	6.2	24.1	35.2	32.9	1.6
Owner-Occupied Units by Geography	398,169	2.5	18.8	37.4	40.8	0.5
Occupied Rental Units by Geography	295,249	10.7	31.3	32.4	22.7	2.8
Vacant Units by Geography	51,037	8.6	24.3	33.3	30.7	3.1
Businesses by Geography	371,630	2.9	14.6	27.0	51.7	3.8
Farms by Geography	3,497	1.4	13.1	27.6	54.7	3.2
Family Distribution by Income Level	425,735	20.7	17.1	20.8	41.5	0.0
Household Distribution by Income Level	693,418	22.1	16.6	18.4	42.9	0.0
Median Family Income MSA - 12420 Austin-Round Rock-San Marcos, TX MSA	\$100,215	Median Housing Value Median Gross Rent Families Below Poverty Level				\$348,053 \$1,359 6.5%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (* The NA category consists of geographies that have not been assigned an income classification.</i>						

FEMA issued a disaster declaration on April 21, 2023, for Travis and Williamson Counties due to severe winter storms. In addition, Caldwell County was issued a disaster declaration on May 17, 2024, and Travis and Williamson Counties were issued disaster declarations on July 6, 2025, due to severe storms, straight-line winds, and floodings.

According to the FDIC Deposit Market Share data as of June 30, 2025, 69 institutions operated 377 offices within this AA. Of these institutions, Bank OZK ranked 27th with 0.6 percent deposit market share.

In 2024, the bank originated 4 reportable home mortgage loans totaling approximately \$3.4 million in the Austin MSA AA. The bank captured 0.01 percent market share by total number and 0.01 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 386th out of 709 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 5 reportable small business loans totaling approximately \$2.5 million in the Austin MSA AA. The bank captured 0.01 percent market share of the total number and 0.1 percent market share of the total dollar volume of loans. The bank's activity ranks 99th out of 215 lenders reporting small business loan originations and purchases inside the AA.

Houston MSA AA

The Houston MSA AA consists of all of Harris and Galveston Counties. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area Houston MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,218	16.0	27.8	24.6	28.2	3.5
Population by Geography	5,081,827	13.3	27.4	27.9	29.5	1.9
Housing Units by Geography	1,943,746	13.9	26.9	26.8	30.2	2.2
Owner-Occupied Units by Geography	982,478	6.4	23.0	30.6	39.2	1.0
Occupied Rental Units by Geography	778,475	22.3	31.8	23.0	19.5	3.5
Vacant Units by Geography	182,793	18.6	27.6	23.0	27.2	3.5
Businesses by Geography	708,512	10.1	22.3	26.9	38.4	2.3
Farms by Geography	3,757	4.1	12.6	24.5	56.6	2.3
Family Distribution by Income Level	1,199,101	26.4	17.5	17.7	38.4	0.0
Household Distribution by Income Level	1,760,953	26.8	16.8	17.1	39.3	0.0
Median Family Income MSA - 26420 Houston-Pasadena-The Woodlands, TX MSA	\$81,128	Median Housing Value Median Gross Rent Families Below Poverty Level				\$222,159 \$1,150 12.3%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

FEMA issued a disaster declaration on May 17, 2024, for Harris County due to severe storms, straight-line winds, tornadoes, and flooding. In addition, both counties in the AA were issued disaster declarations on July 9, 2024, for Hurricane Beryl.

According to the FDIC Deposit Market Share data as of June 30, 2025, 87 institutions operated 924 offices within this AA. Of these institutions, Bank OZK ranked 43rd with 0.2 percent deposit market share.

In 2024, the bank originated 16 reportable home mortgage loans totaling approximately \$3.2 million in the Houston MSA AA. The bank captured 0.02 percent market share by total number and 0.01 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 329th out of 848 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 11 reportable small business loans totaling approximately \$4.0 million in the Houston MSA AA. The bank captured 0.01 percent market share of the total number and 0.1 percent market share of the total dollar volume of loans. The bank's activity ranks 102nd out of 253 lenders reporting small business loan originations and purchases inside the AA.

San Antonio MSA AA

The San Antonio MSA AA consists of all of Bexar County. The following table includes demographic data for this AA.

Demographic Information of the Assessment Area San Antonio MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	375	9.3	36.5	27.2	25.9	1.1
Population by Geography	2,009,324	7.0	32.3	29.4	31.3	0.0
Housing Units by Geography	699,646	7.5	35.6	28.3	28.6	0.0
Owner-Occupied Units by Geography	377,055	4.9	29.8	30.6	34.7	0.0
Occupied Rental Units by Geography	267,506	10.6	42.7	26.2	20.6	0.0
Vacant Units by Geography	55,085	10.4	41.1	22.5	26.0	0.0
Businesses by Geography	209,688	5.8	25.4	24.9	43.7	0.2
Farms by Geography	1,983	3.1	16.8	20.0	60.1	0.1
Family Distribution by Income Level	421,271	23.9	17.9	19.6	38.6	0.0
Household Distribution by Income Level	644,561	25.8	16.5	18.7	39.0	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$74,284	Median Housing Value Median Gross Rent Families Below Poverty Level			\$191,026 \$1,057 11.9%
Source: 2020 U.S. Census Data; 2024 D&B Data Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC Deposit Market Share data as of June 30, 2025, 52 institutions operated 285 offices within this AA. Of these institutions, Bank OZK ranked 23rd with 0.1 percent deposit market share.

In 2024, the bank originated 9 reportable home mortgage loans totaling approximately \$2.8 million in the San Antonio MSA AA. The bank captured 0.02 percent market share by total number and 0.02 percent market share of total dollar volume of loans. According to the 2024 HMDA aggregate data, the bank ranks 253rd out of 591 lenders reporting home mortgage loans inside the AA.

In 2023, the bank originated 9 reportable small business loans totaling approximately \$4.6 million in the San Antonio MSA AA. The bank captured 0.02 percent market share of the total number and 0.3 percent market share of the total dollar volume of loans. The bank's activity ranks 82nd out of 173 lenders reporting small business loan originations and purchases inside the AA.

GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

Community Development Loan: A loan that:

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

Community Development Service: A service that:

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

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

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

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

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

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

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

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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