



February 4, 2022

CRA Decision #228
March 2022

Beth A. Freedman, P.C.
Partner
Silver, Freedman, Taff & Tiernan LLP
3299 K Street NW, Suite 100
Washington, D.C. 20007

Subject: Application for the Merger of Texan Bank, National Association, Houston, Texas
OCC Charter Number 25106
OCC Application Control Number: 2021-SO-Combination-324912

Dear Ms. Freedman:

The Office of the Comptroller of the Currency (OCC) hereby approves your application to merge Texan Bank, National Association, Houston, Texas with and into Home Bank, National Association, Lafayette, Louisiana (Bank), under the charter and title of the latter. The OCC also approves Bank's cash dividend in the approximate amount of \$66 million, consistent with 12 USC 60(b). As indicated in your letter of December 22, 2021, the dividend will be provided to the Bank's holding company, Home Bancorp, Inc., to fund the acquisition of Friendswood Capital Corporation and its wholly-owned subsidiary, Texan Bank, National Association.

This approval is granted based on a thorough review of all information available, including commitments and representations made in the applications, merger agreement, and those of your representatives.

The OCC reviewed the proposed merger transaction under the criteria of the Bank Merger Act, 12 USC 1828(c), and other applicable laws and regulations. Among other matters, we found that the proposed transaction would not have significant anticompetitive effects. We also considered the financial and managerial resources of the banks, their future prospects, their effectiveness in combating money laundering activities, the convenience and needs of the communities to be served and the risk of the transaction to the stability of the United States banking or financial system. Furthermore, the OCC reviewed the Bank's record of compliance with the Community Reinvestment Act, (CRA) 12 USC 2903(a)(2).

The OCC received one public comment regarding the transaction. The OCC has considered the concerns of the commenter as they related to the statutory and regulatory factors noted above, including performance under the CRA, and the probable effects of the merger on the convenience and needs of the communities to be served. Based upon this review, the OCC finds the facts to be consistent with approval.

In addition, the OCC may not approve a merger if the resulting insured depository institution (including all insured depository institutions which are affiliates of the resulting insured depository institution), upon consummation of the transaction, would control more than 10 percent of the total amount of deposits of insured depository institutions in the United States. We considered these factors and found them consistent with approval.

The business combination of the Bank and Texan Bank, National Association is legally authorized as an interstate merger transaction under the Riegle-Neal Act, 12 USC 215a-1 and 1831u(a), and the resulting bank is authorized to retain and operate offices of both banks under 12 USC 36(d) and 1831u(d)(1).

The Southern District Office must be advised in writing in advance of the desired effective date for the merger, so it may issue the necessary certification letter. The effective date must follow the applicable Department of Justice's injunction period and any other required regulatory approval.

The OCC will issue a letter certifying consummation of the transaction when we receive:

- A Secretary's Certificate from each institution, certifying that the shareholder approvals have been obtained.
- An executed merger agreement.

If the merger, and related cash dividend are not consummated within six months from this approval date, the approval shall automatically terminate, unless the OCC grants an extension of time.

This approval and the activities and communications by OCC employees in connection with this filing does not constitute a contract, express or implied, or any other obligation binding upon the OCC, the United States, any agency or entity of the United States, or any officer or employee of the United States, and do not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable law and regulations.

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Our approval is based on the bank's representations, submissions, and information available to the OCC as of this date. The OCC may modify, suspend, or rescind this approval if a material change in the information on which the OCC relied occurs prior to the date of the transaction to which this decision pertains. The foregoing may not be waived or modified by any employee or agent of the OCC or the United States.

A separate letter is enclosed requesting your feedback on how we handled the referenced application. We would appreciate your response so we may improve our service. Please include the OCC control number on any correspondence related to this filing. If you have any questions, contact Licensing Analyst Abel Reyna, Jr. at 214-720-7063 or abel.reyna@occ.treas.gov, or me at (312) 360-8867 or carolina.ledesma@occ.treas.gov.

Sincerely,

/s/

Carolina M. Ledesma
Director for District Licensing

Enclosures: Survey Letter