



PUBLIC DISCLOSURE

September 15, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Triad Bank, National Association
Charter Number 17926
7646 East 61st Street
Tulsa, OK 74133

Office of the Comptroller of the Currency
8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the Oklahoma rating area.
- The Loan-to-Deposit (LTD) ratio was reasonable.
- A majority of the bank's loans were made inside its assessment area (AA).

Loan-to-Deposit Ratio

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

Triad Bank, National Association's (Triad or bank) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 75 percent. Examiners compared the bank's LTD ratio to five similarly situated banks in their market area. The aggregate average LTD ratio for competing banks was 72.2 percent, with a low average of 58.2 percent and a high average of 90.7 percent.

Lending in Assessment Area

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

The bank originated and purchased 75 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

| Table 1: Lending Inside and Outside of the Assessment Area | | | | | | | | | | 2022 - 2024 | | |
|--|-----------------|--------------|-----------|--------------|------------|---------------------------------|--------------|---------------|--------------|----------------|--|--|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) | | |
| | Inside | | Outside | | | Inside | | Outside | | | | |
| | # | % | # | % | | \$ | % | \$ | % | | | |
| Home Mortgage | 74 | 71.15 | 30 | 28.85 | 104 | 20,972 | 75.62 | 6,761 | 24.38 | 27,733 | | |
| Small Business | 31 | 86.11 | 5 | 13.89 | 36 | 12,460 | 72.14 | 4,811 | 27.86 | 17,271 | | |
| Total | 105 | 75.00 | 35 | 25.00 | 140 | 33,432 | 74.29 | 11,572 | 25.71 | 45,004 | | |

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%.

Description of Institution

Triad is a single-state community bank headquartered in Tulsa, Oklahoma with total assets of \$198.4 million as of December 31, 2024. Triad is wholly owned by Triad Bancshares, Inc., a single bank holding company also headquartered in Tulsa, Oklahoma.

Triad has one rating area, the state of Oklahoma, and one AA, the Tulsa, OK MSA (Tulsa MSA). The bank's AA consists of Tulsa County within the Tulsa MSA and includes 208 census tracts (CTs). Triad has two locations in the AA, including the main bank and one branch, both located in southern Tulsa

County. Each location has an automated teller machine (ATM), and surcharge free ATMs are available through the Transfund network.

The bank's lending strategy is primarily focused on commercial lending and commercial loan growth. The bank continues to offer home mortgage permanent financing and secondary market mortgages, as well as home equity lines of credit.

As of December 31, 2024, tier 1 capital was approximately \$26.3 million, and loans totaled \$130.9 million or 66 percent of total assets. By number, the loan portfolio consists of approximately 53.4 percent residential real estate loans, 24.5 percent commercial loans, 21.9 percent consumer loans, and less than one percent agricultural loans. By dollar volume, the loan portfolio consists of 48.2 percent commercial loans, 48.1 percent residential real estate loans, 3.3 percent consumer loans, and less than one percent agricultural loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. Triad's prior CRA PE was dated October 6, 2020, and resulted in an overall Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the CRA performance of Triad Bank using Small Bank performance criteria, which includes the Lending Test. Our evaluation period covered the period from January 1, 2022 to December 31, 2024. In evaluating the bank's lending performance, examiners reviewed the bank's primary loan products, home mortgage loans and commercial loans.

To evaluate the bank's home mortgage lending, examiners selected samples of home mortgage loans originated or purchased between January 1, 2022 and December 31, 2023. Examiners also used Home Mortgage Disclosure Act data collected for the year 2024. For small business lending, examiners selected a sample of loans originated or purchased from January 1, 2022 and December 31, 2024.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Triad only operates in the state of Oklahoma and has only one AA.

The state ratings in rating areas with a single AA are based on performance in that AA. Refer to the “Scope” section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

In evaluating the bank’s performance under the Lending Test, examiners gave equal emphasis to the geographic distribution of the bank’s loans and the bank’s lending by borrower income level.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflected excellent distribution.
- The distribution of loans to individuals of different income levels and to businesses of different sizes was reasonable.

Description of Institution's Operations in Oklahoma

Tulsa MSA

The bank has delineated one AA in the state of Oklahoma, the Tulsa MSA. The bank's AA consists of one county within the Tulsa MSA, Tulsa County. The AA includes 208 CTs including 13 low-income CTs, 66 moderate-income CTs, 53 middle-income CTs, 75 upper-income CTs, and one unclassified CT. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The bank operates two branches within the AA. Both branches are located in southern Tulsa County. Each branch location has an ATM.

Based on June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked 28th out of 52 FDIC-insured depository institutions with 0.6 percent deposit market share within its AA. The top three banks by deposit market share are BOKF, N.A. with 34.5 percent deposit market share, Arvest Bank with 8 percent deposit market share, and Bank of America, N.A. with 5.5 percent deposit market share.

The economy in Tulsa remains stable and is anchored by aerospace manufacturing, healthcare, and oil and gas. Saint Francis Health System and Hillcrest Healthcare System are the two largest employers with approximately 17,500 employees. American Airlines Maintenance Base is the third largest employer with approximately 5,000 employees. Other major employers include Ascension St. John, Amazon, Quiktrip Corp., and AAON Inc.

Examiners evaluated the disparity between the median incomes of families within the AA and the cost of housing. The 2024 Federal Financial Institutions Examination Council (FFIEC) estimated family income for the Tulsa MSA was \$85,300. Based on this information, low-income families earned less than \$42,650, and moderate-income families earned less than \$68,240. The median list price in the AA was \$319,900. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,066 for a low-income borrower and \$1,706 for

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

a moderate-income borrower. Assuming a 30-year mortgage with a 6.5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median list price would be \$1,717. Low- and moderate-income borrowers would be challenged to afford a mortgage loan in the Tulsa MSA.

As part of the evaluation, the OCC used two community contacts previously completed to gain a better understanding of the general community needs, as well as economic conditions. These community contacts included organizations that support affordable housing and small businesses. The contacts noted the need for more affordable housing, down payment assistance programs, financial literacy training, and small business lending.

| Assessment Area(s) - Tulsa MSA AA 2024 | | | | | | | | |
|--|----------|------------|-----------------|-------------------------------------|--------------|-------------|--|--|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | 2022 - 2024 | | |
| Geographies (Census Tracts) | 208 | 6.25 | 31.73 | 25.48 | 36.06 | 0.48 | | |
| Population by Geography | 669,279 | 6.09 | 30.69 | 25.96 | 36.80 | 0.47 | | |
| Housing Units by Geography | 284,341 | 6.89 | 31.45 | 27.26 | 33.98 | 0.42 | | |
| Owner-Occupied Housing by Geography | 151,162 | 3.61 | 23.16 | 27.73 | 45.43 | 0.07 | | |
| Occupied Rental Units by Geography | 102,747 | 11.01 | 40.64 | 26.97 | 20.61 | 0.77 | | |
| Vacant Units by Geography | 30,432 | 9.27 | 41.63 | 25.94 | 22.23 | 0.94 | | |
| Businesses by Geography | 33,819 | 4.52 | 26.30 | 29.16 | 39.83 | 0.19 | | |
| Farms by Geography | 991 | 4.14 | 25.73 | 32.19 | 37.84 | 0.10 | | |
| Family Distribution by Income Level | 159,053 | 21.49 | 17.28 | 18.87 | 42.36 | 0.00 | | |
| Household Distribution by Income Level | 253,909 | 24.01 | 16.50 | 17.41 | 42.08 | 0.00 | | |
| Unemployment rate (%) | 5.40 | 10.32 | 7.30 | 5.10 | 3.48 | 4.10 | | |
| Households Below Poverty Level (%) | 13.50 | 38.61 | 19.84 | 10.22 | 5.54 | 52.44 | | |
| Median Family Income (46140 - Tulsa, OK MSA) | \$72,203 | | | Median Housing Value | \$151,200 | | | |
| Median Family Income (46140 - Tulsa, OK MSA) for 2024 | \$85,300 | | | Median Gross Rent | \$921 | | | |
| | | | | Families Below Poverty Level | 10.90 | | | |
| FFIEC File - 2024 Census | | | | | | | | |
| 2024 Dun & Bradstreet SBSF Demographics | | | | | | | | |
| Due to rounding, totals may not equal 100.0% | | | | | | | | |
| (*) The NA category consists of geographies that have not been assigned an income classification | | | | | | | | |

Scope of Evaluation in Oklahoma

Examiners conducted a full-scope review of the Tulsa MSA. There are no limited-scope AAs in the state of Oklahoma.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Tulsa MSA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to table 7 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The percentage of bank loans in low-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate percentage in those geographies. The percentage of bank loans in moderate-income geographies was near to the percentage of owner-occupied housing units and exceeded the aggregate level of lending in those CTs.

Small Loans to Businesses

Refer to table 9 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank did not make any loans to businesses in low-income CTs. The percentage of bank loans in moderate-income geographies exceeded both the percentage of businesses and the aggregate lending level in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Tulsa MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

Based on the data in the tables and considering the performance context factors discussed above, the bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

The percentage of bank loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of lending to low-income borrowers. The percentage of bank loans to moderate-income borrowers was significantly below the percentage of moderate-income families and was well below the aggregate percentage of lending to moderate-income borrowers.

Small Loans to Businesses

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

The percentage of bank loans to businesses with revenues of \$1 million or less was below the percentage of businesses with revenues of \$1 million or less but exceeded the aggregate percentage of lending to businesses of that size.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

Appendix A: Scope of Examination

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

| | | |
|---|--|--------------------------|
| Time Period Reviewed: | 01/01/2022 to 12/31/2024 | |
| Bank Products Reviewed: | Home mortgages Small business loans | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| NA | NA | NA |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| Oklahoma | | |
| Tulsa, OK MSA (Tulsa MSA) | Full-scope | Tulsa County only |

Appendix B: Summary of MMSA and State Ratings

| RATINGS | |
|----------------------------------|---------------------|
| Overall Bank: | Lending Test Rating |
| Triad Bank, National Association | Satisfactory |
| State: | |
| Oklahoma | Satisfactory |

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

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

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

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -

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

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

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

| Assessment Area: | 2022 - 2024 | | | | | | | | | | | | | | | | | | |
|------------------|---------------------------|---------------|-------------------|----------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|--------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|
| | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total Number | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | % Aggregate |
| Tulsa MSA | 7420,972 | 100.00 | 48,293 | 3.61 | 8.11 | 2.24 | 23.16 | 21.62 | 20.35 | 27.73 | 16.22 | 27.47 | 45.43 | 54.05 | 49.86 | 0.07 | 0.00 | 0.06 | |
| Total | 7420,972 | 100.00 | 48,293 | 3.61 | 8.11 | 2.24 | 23.16 | 21.62 | 20.35 | 27.73 | 16.22 | 27.47 | 45.43 | 54.05 | 49.86 | 0.07 | 0.00 | 0.06 | |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

| Assessment Area: | 2022 - 2024 | | | | | | | | | | | | | | | | | | |
|------------------|---------------------------|---------------|-------------------|----------------|----------------------|--------------|--------------|---------------------------|--------------|--------------|-------------------------|--------------|--------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total Number | Overall Market | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate | % Families | % Bank Loans | % Aggregate |
| Tulsa MSA | 7420,972 | 100.00 | 48,293 | 21.49 | 12.16 | 6.13 | 17.28 | 6.76 | 16.45 | 18.87 | 8.11 | 19.00 | 42.36 | 37.84 | 34.23 | -- | 35.14 | 24.19 | |
| Total | 7420,972 | 100.00 | 48,293 | 21.49 | 12.16 | 6.13 | 17.28 | 6.76 | 16.45 | 18.87 | 8.11 | 19.00 | 42.36 | 37.84 | 34.23 | -- | 35.14 | 24.19 | |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

| Assessment Area: | 2022 - 2024 | | | | | | | | | | | | | | | | | | |
|------------------|---------------------------------|-------------|-------------------|----------------|-------------------|--------------|--------------|------------------------|--------------|--------------|----------------------|--------------|--------------|---------------------|--------------|-------------|-----------------------------|--------------|-------------|
| | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total Number | Overall Market | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Aggregate |
| Tulsa MSA | 3112,460 | 100.00 | 30,729 | 4.52 | 0.00 | 4.04 | 26.30 | 48.39 | 23.70 | 29.16 | 16.13 | 27.21 | 39.83 | 35.48 | 44.94 | 0.19 | 0.00 | 0.12 | |
| Total | 3112,460 | 0.00 | 30,729 | 4.52 | 0.00 | 4.04 | 26.30 | 48.39 | 23.70 | 29.16 | 16.13 | 27.21 | 39.83 | 35.48 | 44.94 | 0.19 | 0.00 | 0.12 | |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

| Assessment Area: | 2022 - 2024 | | | | | | | | | | |
|------------------|---------------------------------|---------------|-------------------|---------------------------------|--------------|--------------|--------------------------------|--------------|--|--------------|--------------|
| | Total Loans to Small Businesses | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total Number | Overall Market | % Businesses | % Bank Loans | % Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| Tulsa MSA | 31 | 12,460 | 100.00 | 30,729 | 81.15 | 67.74 | 52.07 | 9.66 | 32.26 | 9.19 | 0.00 |
| Total | 31 | 12,460 | 100.00 | 30,729 | 81.15 | 67.74 | 52.07 | 9.66 | 32.26 | 9.19 | 0.00 |

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%