



## **PUBLIC DISCLOSURE**

January 03, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Amarillo National Bank  
Charter Number 14206

400 South Taylor, Plaza One  
Amarillo, TX 79101

Office of the Comptroller of the Currency

5001 West Loop 289  
Suite 250  
Lubbock, TX 79414

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 Outstanding.

The following table indicates the performance level of Amarillo National Bank (ANB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Amarillo National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
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 major factors that support this rating include:

- The Lending Test rating is based primarily on the excellent performance in the Amarillo MSA. Lending levels were excellent. Community Development (CD) lending had a significant positive impact on the overall Lending Test rating. ANB’s overall lending was responsive to the unforeseen community needs that arose due to the Covid-19 pandemic in 2020.
- The Investment Test rating is based primarily on the good performance in the Amarillo MSA with an adequate level of qualified CD investments and grants. We considered the fact that CD investment opportunities are limited in the full-scope assessment areas.
- The Service Test rating is based on excellent performance in the Amarillo MSA. Branch offices and service delivery systems were readily accessible to borrowers and geographies of different income levels. Overall, the bank provided a relatively high level of community development services considering the obstacles to in-person availability in 2020 due to the Covid-19 pandemic.

### Flexible lending products available bank-wide

ANB offers various loan modification programs bank-wide:

- Federal Housing Administration (FHA) Home Affordable Modification Program (HAMP) – this program allows borrowers to modify their mortgages to reduce mortgage payments and avoid foreclosure through the use of a partial claim. The partial claim, up to 30 percent of the unpaid principal balance, defers the repayment of mortgage principal through an interest-free subordinate mortgage that is not due until the first mortgage is paid off. During the evaluation period, ANB modified 12 loans.

- Fannie Mae Flex Modification Program – this program replaced the HAMP Program and helps reduce an eligible borrower’s mortgage payment by approximately 20 percent. To qualify, borrowers must have a conventional first mortgage loan for at least 12 months and a stable income. With a Flex Modification, one or more of the following steps is taken to lower payments: capitalize overdue amounts, adjust the interest rate, extend the loan term, or forbear some of the principal balance. During the evaluation period, the bank modified 53 loans.
- ANB Mortgage Loan Modification Program – includes loans that do not qualify for the government programs. The modified loan is a fixed rate mortgage that can be re-amortized up to 360 months for a more affordable payment. Additionally, past due payments, escrow shortages and any applicable legal fees can be capitalized into the mortgage principal. During the evaluation period, ANB modified 12 loans.

ANB offers a small dollar loan program with balances from \$500 to \$2,500 to allow borrowers to build or repair credit and as an alternative to payday loans. During the evaluation period, the bank originated 5.1 thousand loans totaling \$7.4 million.

The following loan program offerings are targeted to low- and moderate-income individuals:

- United States Department of Agriculture (USDA) loans – helps low- and moderate-income individuals purchase homes in rural areas. No down payment is required with 100 percent financing and a minimum credit score of 600. During the evaluation period, ANB originated nine loans totaling \$950 thousand.
- SETH Bond Program – this program promotes affordable housing opportunities for low- to moderate Texans. This includes down payments and closing costs assistance toward the purchase of a primary residence by providing a grant up to five percent of the loan amount. During the evaluation period, this Program was used to originate 18 loans totaling \$2.2 million.
- Homebuyers Equity Leverage Partnership (HELP) Program – assists low-income, first-time homebuyers, with down payment assistance and closing costs. During the origination period, this Program was used to originate 15 loans with funds totaling \$77.5 thousand.
- CD secured Credit Rebuild loans – helps low- and moderate-income individuals build and gain future access to credit. During the evaluation period, ANB originated 46 loans totaling \$29.5 thousand.
- CD secured Credit Cards – helps low- and moderate-income individuals build and gain future access to credit. During the evaluation period, ANB originated 613 secured credit cards.

ANB also participated in the Small Business Administration’s Paycheck Protection Program (PPP) to help businesses keep their workforce employed during the COVID-19 Pandemic. In 2020, ANB originated 3,469 loans totaling \$478.6 million. This included a \$1.2 million loan to a small farm in Kansas to continue operations. ANB also granted extensions on 281 mortgage loans and 5,943 instalment loans to assist customers experiencing financial hardships as a result of the Pandemic.

## **Lending in Assessment Area**

A high percentage of the bank’s loans are in its assessment areas (AAs).

The bank originated and purchased 81.9 percent of its total loans inside the bank’s assessment areas 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	5,748	86.0	935	14.0	6,683	1,068,014	82.5	226,936	17.5	1,294,950
Small Business	5,361	79.7	1,367	20.3	6,728	573,477	71.5	229,016	28.5	802,493
Small Farm	203	50.6	204	49.4	407	31,992	43.9	40,895	56.1	72,887
<b>Total</b>	<b>11,312</b>	<b>81.9</b>	<b>2,506</b>	<b>18.1</b>	<b>13,818</b>	<b>1,673,483</b>	<b>77.1</b>	<b>496,847</b>	<b>22.9</b>	<b>2,170,330</b>

Loans inside the AA are considered part of the geographical distribution analysis under the Lending Test. Loans inside the AA are considered part of the geographical distribution analysis under the Lending Test.

## Description of Institution

Amarillo National Bank (ANB) is a \$7.1 billion intrastate, family-owned community bank headquartered in Amarillo, Texas. ANB is wholly owned by Amarillo National Bancorp, Inc., a one-bank holding company, located in Amarillo, Texas with reported total assets of \$7.1 billion.

The Bank’s business strategy is to be responsive and meet the banking needs of individuals and businesses in the assessment areas and to build and maintain relationships with its customers, focusing on small business, mortgage products, and agriculture loans. ANB acquired Lubbock National Bank on March 4, 2019, a \$1.1 billion institution. With this acquisition, the bank gained two new AAs in Texas: the entire College Station-Bryan and Austin-Round Rock-Georgetown (Austin) MSAs. Lubbock County was a shared AA between ANB and Lubbock National Bank.

As of December 31, 2020, ANB reported tier one capital of \$609.8 million. Net loans and leases represent 75.4 percent of average assets. The loan portfolio, by dollar volume, consisted of commercial loans (37.5 percent), real estate loans (32.5 percent), individual loans (16.7 percent), and agricultural loans (9.9 percent).

ANB’s rated area is the state of Texas with 30 branches (25 full-service and five limited-service) and seven deposit-taking ATMs. The Amarillo, Lubbock, and College Station-Bryan MSA AAs have 17, seven, and four branches, respectively. The Austin MSA and non-MSA AAs each have one branch. ANB also has four loan production offices in Texas, one each in Amarillo, Lubbock, Fort Worth-Arlington, and San Antonio.

There are no known legal, financial factors, or other factors impeding the institution’s ability to help meet credit needs in its AA. ANB received an “Outstanding” rating in its previous CRA evaluation dated October 15, 2018.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated home mortgage loans, small loans to businesses, small loans to farms, community development (CD) loans, qualified investments, and CD and retail services from January 1, 2018 through December 31, 2020 for the AAs of Amarillo MSA, Lubbock MSA, and Borger non-MSA. Since the bank acquired Lubbock National Bank in March 2019, our evaluation period for the new AAs of College Station-Bryan and Austin MSAs was January 1, 2019 through December 31, 2020. We combined the reporting for 2019 since ANB filed a consolidated loan application register for 2019. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of ANB’s business and management did not request consideration.

Qualifying activities performed in 2020 in response to the significant impact of the coronavirus pandemic across the United States were also considered as part of this evaluation. Qualifying activities in response to the coronavirus pandemic after December 31, 2020 will be considered in the subsequent evaluation.

The OCC determined that 20 loans made within an AA was sufficient for analysis purposes. Therefore, we analyzed small loans to farms in the Amarillo AA only. All of the other AAs originated and/or purchased less than 20 small farm loans during the evaluation period.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 section 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 based on its performance in the state of Texas. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank’s 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 assessment area 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 Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Texas

**CRA rating for the State of Texas<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the AA credit needs.
- ANB exhibits good geographic distribution and borrower distribution of loans.
- A relatively high level of CD loans that are responsive to identified community needs having a significantly positive impact on the Lending Test rating.
- ANB had an adequate level of CD investments and grants.
- ANB's service delivery systems are readily accessible and provide a relatively high level of CD services to geographies and individuals of different income levels in the institution's AA.

### Description of Institution's Operations in Texas

The state of Texas AAs includes portions of the Amarillo and Lubbock MSAs. In addition, the AAs include the entire Austin-Round Rock-Georgetown (Austin) and College Station-Bryan MSAs, and the non-MSA county of Hutchinson (Borger).

Based on the FDIC summary of deposit information as of June 30, 2020, ANB had \$5.9 billion in total deposits. The bank ranked 4<sup>th</sup> in deposit market share with 7.6 percent within these combined AAs in Texas. Primary competitors included Wells Fargo Bank, N.A. with 89 branches and 16.0 percent market share, J.P. Morgan Chase Bank, N.A. with 58 branches and 12.9 percent market share, and Bank of America, N.A. with 42 branches and 10.9 percent market share. There were 97 additional depository institutions within the bank's AAs.

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<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Amarillo MSA

The following table provides a summary of demographics, including housing and business information for the Amarillo MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Amarillo MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	63	4.8	30.2	34.9	28.6	1.6
Population by Geography	249,134	2.2	29.4	36.7	31.7	0.0
Housing Units by Geography	101,545	2.4	28.8	36.4	32.3	0.0
Owner-Occupied Units by Geography	58,512	1.0	22.9	34.8	41.3	0.0
Occupied Rental Units by Geography	33,485	4.1	37.8	38.9	19.1	0.0
Vacant Units by Geography	9,548	5.4	33.5	37.6	23.5	0.0
Businesses by Geography	18,274	5.6	24.0	30.3	39.9	0.2
Farms by Geography	773	2.5	12.2	27.4	58.0	0.0
Family Distribution by Income Level	61,074	22.0	17.0	19.7	41.3	0.0
Household Distribution by Income Level	91,997	25.1	16.0	17.8	41.1	0.0
Median Family Income MSA - 11100 Amarillo, TX MSA		\$61,673	Median Housing Value			\$121,615
			Median Gross Rent			\$764
			Families Below Poverty Level			12.2%
<i>Source: 2015 ACS and 2020 D&amp;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>						

The AA consists of Potter and Randall counties within the Amarillo, TX MSA. The AA has 63 census tracts (CTs), which includes three low-income, 19 moderate-income, 22 middle-income, and 18 upper-income tracts. In addition, one CT does not report data and is listed as unknown. The percentage of households living below poverty is 15.2 percent. According to the FDIC’s Summary of Deposits as of June 30, 2020, 81.2 percent of bank deposits are in this AA. Over the evaluation period, there was a slight increase in the FFIEC updated MSA median family income from \$66.8 thousand in 2018 to 67.1 thousand in 2020.

ANB operates 17 branches in the AA and four deposit-taking ATMs. The deposit market share is 54.2 percent, which ranks 1<sup>st</sup> among all institutions. Competition is strong with 18 other depository institutions in the AA. Happy State Bank is the primary competitor with 18.0 percent deposit market share,

Employment and Economic Factors

According to Moody's Analytics, the economy is in recovery. The Texas Economic Development Corporation indicated that the Amarillo economy is supported by its strong transportation infrastructure, diverse industries, highly skilled workforce, and a cost of living that is well below the state of Texas and the country. According to the Bureau of Labor Statistics, the unemployment rate for the Amarillo MSA AA almost doubled in 2020 compared to 2018 and 2019, primarily as a result of the COVID-19 pandemic. As of December 2020, the average rate was 5.0 percent compared to 7.6 percent in the state of Texas and 8.1 percent in the United States.

Top industries in the AA include manufacturing, health care, retail trade, and educational services. Top employers include the local independent school districts, Tyson Foods, Inc, CNS Pantex, BSA Health System, and West Texas A&M University.

### Housing

Based on a report by Moody's Analytics dated September 2021, home prices increased 6.3 percent from \$198.0 thousand in 2018 to \$210.5 thousand in 2020. Total housing units in the AA consisted of 57.6 percent owner-occupied, 33.0 percent rental, and 9.4 percent vacant.

Low- and moderate-income families earned up to \$33,550 and \$53,680 per year, respectively. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. The maximum monthly payment for a low-income borrower is \$838.75. For a moderate-income borrower, the maximum monthly payment is \$1,342.00. Assuming a 30-year mortgage with a five 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 MSA median housing value would be \$652.86. This illustrates that housing is affordable for moderate-income and some low-income families.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The percentage of households living below poverty is 15.2 percent. This shows that the poverty rate in this area is making home ownership unattainable for many in the AA.

### Community Contact

We considered one community contact from a local community-based organization with a mission to address health, education, financial stability, and the basic needs of every person in their community. Primary needs include affordable housing and help with housing payments, healthcare and food. CD loan opportunities are available for banks to participate in programs with the City of Amarillo that assist individuals with housing and utility payments, and food.

### Lubbock MSA

The following table provides a summary of demographics, including housing and business information for the Lubbock MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lubbock MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	68	8.8	22.1	35.3	32.4	1.5
Population by Geography	290,782	5.6	22.0	39.9	32.5	0.0
Housing Units by Geography	119,565	6.5	21.9	38.1	33.5	0.0
Owner-Occupied Units by Geography	61,164	2.5	16.4	38.1	42.9	0.0
Occupied Rental Units by Geography	46,376	10.6	27.9	38.5	23.0	0.0
Vacant Units by Geography	12,025	10.7	26.6	36.5	26.2	0.0
Businesses by Geography	27,134	3.5	15.2	36.1	45.1	0.1
Farms by Geography	1,229	1.5	8.5	35.2	54.8	0.0
Family Distribution by Income Level	66,941	22.1	16.4	19.5	41.9	0.0
Household Distribution by Income Level	107,540	24.4	16.0	17.7	41.9	0.0
Median Family Income MSA - 31180 Lubbock, TX MSA		\$57,914	Median Housing Value			\$110,016
			Median Gross Rent			\$827
			Families Below Poverty Level			12.5%
<i>Source: 2015 ACS and 2020 D&amp;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>						

The AA consists of Lubbock County within the Lubbock, TX MSA. The AA has 68 census tracts, which includes six low-income; 15 moderate-income; 24 middle-income; and 22 upper-income tracts. In addition, one CTs does not report data and is listed as unknown. The percentage of households living below poverty is 18.2 percent. According to the FDIC’s Summary of Deposits as of June 30, 2020, 13.1 percent of bank deposits are in this AA. The FFIEC updated MSA median family income increased 10.5 percent over the evaluation period from \$62.8 thousand in 2018 to \$69.4 thousand in 2020.

ANB operates seven branches in the AA and three deposit-taking ATMs. The deposit market share is 7.8 percent, which rank 5<sup>th</sup> among all institutions. Competition is strong with 23 other depository institutions in the AA. Primary competitors included PlainsCapital Bank with 10 branches and 20.0 percent market share, City Bank with eight branches and 16.5 percent market share, Wells Fargo Bank, N.A. with nine branches and 9.2 percent market share, and Prosperity Bank with 16 branches and 8.3 percent market share.

Employment and Economic Factors

According to a Lubbock Avalanche-Journal published November 15, 2020, the economy is in recovery. Lubbock is the regional hub of West Texas. The tourism industry was dramatically impacted by the COVID-19 pandemic. Based on data from [www.citytowninfo.com](http://www.citytowninfo.com), Lubbock is the center of a diversified agriculture-industrial complex. Petroleum, engineering products, and cottonseed oil are important economic components for the region. Data from the Bureau of Labor Statistic shows that the unemployment rate for Lubbock County doubled in 2020 compared to 2018 and 2019, primarily as a

result of the COVID-19 pandemic. As of December 2020, the rate was 5.7 percent compared to 7.6 percent in the state of Texas and 8.1 percent in the United States.

Top industries in the AA include agribusiness, education, food processing, health services, information systems & technology, and manufacturing. Top employers in the AA include United Supermarkets, Texas Tech University, Covenant Health, and UMC Health Systems.

### Housing

Based on a report by Moody's Analytics dated September 2021, home prices increased 7.9 percent from \$194.6 thousand in 2018 to \$210.0 thousand in 2020. Total housing units in the AA consisted of 51.2 percent owner-occupied, 38.8 percent rental, and 10.0 percent vacant.

Low- and moderate-income families earned up to \$34,700 and \$55,520 per year, respectively. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. The maximum monthly payment for a low-income borrower is \$867.50. For a moderate-income borrower, the maximum monthly payment is \$1,388.00. Assuming a 30-year mortgage with a five 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 MSA median housing value would be \$590.59. This illustrates that housing is affordable for moderate-income and some low-income families.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The percentage of households living below poverty is 18.2 percent. This shows that the poverty rate in this area is making home ownership unattainable for many in the AA.

### Community Contacts

We considered two community contacts in the AA with organizations focused on promoting economic development, home ownership, financial education, and mentoring of youth. The community contacts emphasized the need for banks to provide financial literacy training, affordable housing, and assistance with rent and utility payments, and food.

## **Scope of Evaluation in Texas**

Examiners completed full-scope reviews in the Amarillo MSA and Lubbock MSA assessment areas. The Amarillo MSA carried the most weight with 81.2 percent of deposits and 80.7 percent of loans in the state. We performed limited-scope procedures in the Borger non-MSA, Austin MSA, and College Station-Bryan MSA assessment areas. Examiners based the ratings on the results of the full-scope review and performance in limited-scope areas, as applicable. Refer to appendix A for a list of all AAs under review.

In the Amarillo MSA AA, examiners placed equal weight on home mortgage and small business loans, which represent 50.8 percent and 47.4 percent, respectively. In the Lubbock MSA AA, examiners placed more weight on home mortgage loans, which represents 58.2 percent of lending during the evaluation period.

## Conclusions in Respect to Performance Tests in Texas

### Lending Test

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Amarillo MSA is excellent and Lubbock MSA is good.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>	<b>% State Loans</b>	<b>% State Deposits</b>
<b>Full Scope:</b>							
Amarillo MSA	4,683	4,246	194	60	9,183	80.7	81.2
Lubbock MSA	585	418	3	2	1,008	8.9	13.1
<b>Limited Scope:</b>							
Borger non-MSA	269	208	1	0	478	4.2	2.2
Austin MSA	55	181	4	0	240	2.1	0.8
College Station-Bryan MSA	156	308	1	0	465	4.1	2.7
<b>Statewide/Regional:</b>							
Broader statewide with no P/M/F	0	0	0	1	1	0	0
Regional with no P/M/F	0	0	0	2	2	0	0
<b>Total</b>	<b>5,748</b>	<b>5,361</b>	<b>203</b>	<b>65</b>	<b>11,377</b>	<b>100.00</b>	<b>100.00</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<b>Dollar Volume of Loans (\$000)*</b>							
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>	<b>% State Loans</b>	<b>% State Deposits</b>
<b>Full Scope:</b>							
Amarillo MSA	838,720	452,191	30,274	49,047	1,370,232	79.3	81.2
Lubbock MSA	114,093	39,031	287	2,511	155,922	9.0	13.1
<b>Limited Scope:</b>							
Borger non-MSA	31,265	17,140	75	0	48,480	2.8	2.2
Austin MSA	41,341	30,083	763	0	72,187	4.2	0.8
College Station-Bryan MSA	42,595	35,032	243	0	77,870	4.5	2.7
<b>Statewide/Regional:</b>							
Broader statewide with no P/M/F	0	0	0	1,155	1,155	0.1	0
Regional with no P/M/F	0	0	0	1,600	1,600	0.1	0
<b>Total</b>	<b>1,068,014</b>	<b>573,477</b>	<b>31,642</b>	<b>54,313</b>	<b>1,727,446</b>	<b>100.00</b>	<b>100.00</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

### Amarillo MSA

ANB ranked 1<sup>st</sup> out of 19 depository institutions with a deposit market share of 54.2 percent. For home mortgage loans, the bank's market share of 20.4 percent ranked 1<sup>st</sup> out of 319 institutions.

For small loans to businesses, ANB's market share of 12.9 percent ranked 2<sup>nd</sup> out of 187 lenders. The top lender was J.P. Morgan Chase Bank, N.A. with a 21.1 percent market share. For small loans to businesses with revenues of \$1 million or less, ANB ranks 1<sup>st</sup> with a market share of 50.4 percent out of 101 lenders.

For small loans to farms, ANB's market share of 21.3 percent ranked 2<sup>nd</sup> out of 16 lenders. The top lender was Happy State Bank with a 37.4 percent market share. For small loans to farms with revenues of \$1 million or less, ANB also ranks 2<sup>nd</sup> with a market share of 21.5 percent.

### Lubbock MSA

ANB ranked 5<sup>th</sup> out of 19 (top 26.3 percent) depository institutions with a deposit market share of 7.8 percent. For home mortgage loans, the bank's market share of 2.5 percent ranked 10<sup>th</sup> out of 347 institutions (top 2.9 percent).

For small loans to businesses, ANB's market share of 12.9 percent ranked 2<sup>nd</sup> out of 187 lenders. The top lender was J.P. Morgan Chase Bank, N.A. with a 21.1 percent market share. For small loans to businesses with revenues of \$1 million or less, ANB ranks 1<sup>st</sup> with a market share of 50.4 percent out of 101 lenders.

We did not perform an analysis of small loans to farms. An analysis of these loans was not meaningful since the bank originated or purchased less than 20 small farm loans during the evaluation period in the AA.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the state of Texas 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.

#### Amarillo MSA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated and purchased in low-income geographies was below the percentage of owner-occupied housing units located in these geographies and was significantly below the percentage of owner-occupied housing units in moderate-income geographies. Only one percent of owner-occupied housing units are located in low-income census tracts. The percentage of home mortgage loans originated or purchased in low-income geographies equaled, and in moderate-income geographies exceeded, the aggregate percentage of all reporting lenders.

#### Lubbock MSA

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated and purchased in low-income geographies was below the percentage of owner-occupied housing units located in these geographies and was significantly below the percentage of owner-occupied housing units in moderate-income geographies. Only 2.5 percent of owner-occupied housing units are located in low-income census tracts. The percentage of home mortgage loans originated or purchased in low-income geographies exceeded, and in moderate-income geographies was near to, the aggregate percentage of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Texas 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.

#### Amarillo MSA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded both the percentage of businesses located in these geographies and the aggregate percentage of all reporting lenders.

#### Lubbock MSA

The geographic distribution of small loans to businesses was excellent. The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in these geographies and exceeded the percentage of businesses in moderate-income geographies. The percentage of small loans to businesses originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

### ***Small Loans to Farms***

Refer to Table S in the state of Texas 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 farms.

We did not perform an analysis of small loans to farms in the Lubbock MSA AA. Based on the number of loan originations and purchases, an analysis of these loans was not meaningful.

#### Amarillo MSA

The geographic distribution of small loans to farms is good. The percentage of small loans to farms originated or purchased in low-income geographies was near to the percentage of farms located in these geographies and was below the percentage of farms in moderate-income geographies. The percentage of small loans to farms originated or purchased in both low- and moderate-income geographies exceeded the aggregate percentage of all reporting lenders.

### ***Lending Gap Analysis***

The OCC analyzed ANB's geographic lending patterns of home mortgage and small loans to businesses by mapping loan originations and purchases throughout the AAs. Examiners did not identify any unexplained conspicuous lending gaps. Small loans to farms are not a significant lending product for ANB.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

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

Our analysis considered the cost of housing for low- and moderate-income individuals noted in the "Description of Institution's Operations in Texas" section above.

#### Amarillo MSA

The borrower distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below, and to moderate-income borrowers was near to, the percentage of families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the percentage of all reporting lenders.

#### Lubbock MSA

The borrower distribution of home mortgage loans among individuals of different income levels was good. The percentage of home mortgage loans originated or purchased to low-income borrowers was

significantly below, and to moderate-income borrowers was below, the percentage of families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the percentage of all reporting lenders.

### ***Small Loans to Businesses***

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

A large percentage of loans to businesses without available revenue information consists of PPP loans.

#### Amarillo MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses with gross annual revenue of \$1 million or less was significantly below the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

#### Lubbock MSA

The distribution of loans to businesses of different sizes was good. The percentage of loans to small businesses with gross annual revenue of \$1 million or less was significantly below the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

### ***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

We did not perform an analysis of small loans to farms in the Lubbock MSA AA. Based on the number of loan originations and purchases, an analysis of these loans was not meaningful.

#### Amarillo MSA

The distribution of loans to farms of different sizes was good. The percentage of loans to small farms with revenues of \$1 million or less was below the percentage of small businesses in the AA and near to the aggregate percentage of all reporting lenders.

## **Community Development Lending**

The institution has made a relatively high level of CD loans. CD loans had a significantly positive impact on the Lending Test rating.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Amarillo MSA

ANB has made a relatively high level of CD loans and had a significantly positive impact on the Lending Test in the Amarillo MSA. ANB made 60 CD loans totaling \$49.0 million, which represented 9.9 percent of tier 1 capital. CD loans were responsive to identified community needs. Examples of CD loans in the AA include:

- Six loans totaling \$28.8 million to develop real estate and build a convenience store in the East Gateway Tax Increment Reinvestment Zone (TIRZ) that will also bring jobs to the area.
- Eighteen loans totaling \$1.8 million to organizations that provide assistance with housing payments, healthcare, and food.
- Four affordable housing loans totaling \$345 thousand.

### Lubbock MSA

The level of CD lending was adequate. ANB made two CD loans totaling \$2.5 million, which represented 3.2 percent of tier 1 capital. Both loans were PPP loans to help businesses continue operations during the COVID-19 pandemic.

### Texas – Statewide

Since the bank has been responsive to the needs and opportunities of the AA, we considered CD lending originated in the broader Texas statewide area. During the evaluation period, ANB originated one PPP loan totaling \$1.2 million to help a small utility construction company continue operations. This loan does not have a purpose, mandate, or function (P/M/F) to serve the AAs.

### Texas – Regional

Since the bank has been responsive to the needs and opportunities of the AA, we considered CD lending originated in the broader Southwestern regional area of the United States, which includes Texas. During the evaluation period, ANB originated two loans totaling \$1.6 million that helped a small business purchase inventory and provide jobs in a distressed non-MSA community. These loans do not have a purpose, mandate, or function (P/M/F) to serve the AAs.

## **Product Innovation and Flexibility**

The institution makes extensive use of flexible lending practices in order to serve AA credit needs. During the evaluation period, loan modification programs were used to originate 77 loans and 42 loans were originated using affordable housing loan programs. Under the Small Dollar Loan Program, 5.1 thousand loans were originated. ANB originated 659 loans using programs to help individuals rebuild credit. All flexible loan programs are bank-wide. Refer to the Lending Test category in the “Overall Other Performance Data” section above.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Borger non-MSA and Austin MSA was consistent with the bank’s overall performance under the Lending Test in the full-scope areas. The bank’s performance in the College Station-Bryan MSA was weaker than the overall Lending Test performance due to weaker geographic and borrower distribution of small loans to businesses. Performance in limited-scope AAs had a neutral impact on the overall Lending Test conclusions.

Refer to Tables O through V in the state of Texas section of appendix D for the facts and data that support these conclusions.

## Investment Test

The bank’s performance under the Investment Test in Texas is rated High Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Amarillo MSA and Lubbock MSA is good considering performance context.

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.

The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

<b>Qualified Investments*</b>										
<b>Assessment Area</b>	<b>Prior Period**</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments***</b>	
	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$(000's)</b>
<b>Full Scope:</b>										
Amarillo MSA	1	3,710	601	3,944	602	70.9	7,654	29.0	0	0
Lubbock MSA	0	0	144	730	144	17.0	730	2.8	0	0
<b>Limited Scope:</b>										
Borger non-MSA	0	0	39	79	39	4.6	79	0.3	0	0
Austin MSA	0	0	4	1,803	4	0.5	1,803	6.8		
College Station-Bryan MSA	5	21	22	233	27	3.2	254	1.0	0	0
<b>Statewide/Regional:</b>										
Broader statewide with P/M/F	3	929	0	0	3	0.3	929	3.5	0	0
Broader statewide with no P/M/F	2	628	28	14,314	30	3.5	14,942	56.6	0	0
<b>Total</b>	<b>11</b>	<b>5,288</b>	<b>838</b>	<b>21,103</b>	<b>849</b>	<b>100</b>	<b>26,391</b>	<b>100</b>	<b>0</b>	<b>0</b>
* The table presents the data for all AAs. The narrative below addresses performance in full-scope areas only.										
** Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.										
*** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution’s financial reporting system.										

## Amarillo MSA

ANB had 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. We gave consideration to the limited CD investment opportunities in the AA, including the lack of a Community Development Financial Institution. ANB had 601 donations in the Amarillo MSA totaling \$3.9 million. We also considered the ongoing impact that investments made prior to the current evaluation period had within

the AA. The remaining balance on one prior period investment was \$3.7 million. This was an affordable housing mortgage-backed security for a multi-family property in which all of the units are restricted under the Section 8 Housing Assistance Program. When considering both current and prior period investments, the total of \$7.7 million represents 1.5 percent of allocated tier one capital.

Examples of qualified donations include:

- 25 donations totaling \$475.8 thousand to an organization that primarily benefits low- and moderate-income individuals by partnering with agencies that address core needs.
- 15 donations totaling \$474.3 thousand to a food bank that provides healthy, daily meals to at-risk youth.
- 12 donations totaling \$396.4 thousand to a foundation that primarily serves low- and moderate-income college students by providing educational scholarships.
- 23 donations totaling \$33.4 thousand to support affordable housing for low- and moderate-income individuals, including those that are homeless.

### Lubbock MSA

ANB had 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. We gave consideration to the limited CD investment opportunities in the AA, including the lack of a Community Development Financial Institution. ANB had 144 donations in the Amarillo MSA totaling \$443.7 thousand. In addition, the bank invested in a statewide Ginnie Mae security that benefitted multiple AAs, including \$285.9 thousand in the Lubbock MSA. The investment provided loans to low- or moderate-income households and/or in low- or moderate-income geographies. Total investments of \$729.6 thousand represents 0.9 percent of allocated tier one capital.

Examples of qualified donations include:

- Four donations totaling \$86.2 thousand to an organization that primarily serves low- and moderate-income women and children by offering childcare, youth programs, cancer screenings, and clothing.
- 13 donations totaling \$56.4 thousand to an organization that primarily benefits low- and moderate-income individuals by partnering with agencies that address core needs.
- Seven donations totaling \$28.1 thousand to a food bank that provides meals to those in need. The bank also made six donations totaling \$17.7 thousand to an organization primarily benefits low- and moderate-income individuals by providing meals to persons that are homebound, unable to prepare well-balanced daily meals, and does not have anyone to help prepare meals for them.
- Eight donations totaling \$12.4 thousand to support affordable housing for low- and moderate-income individuals, including those experiencing domestic violence.

### Texas – Statewide

We considered outstanding investments made prior to the current evaluation period. This included three affordable housing mortgage-backed securities totaling \$929.3 thousand that have a purpose, mandate, or function (P/M/F) to serve bank AAs.

The bank made several investments that do not have a P/M/F to serve bank AAs. Since the bank has been responsive to the needs and opportunities of the AA, we considered these investments in our overall Investment Test ratings. ANB funded 19 school district bonds totaling \$14.3 million and made nine donations totaling \$4.1 thousand. There are also two prior-period outstanding school district bonds

totaling \$628.0 thousand that do not have a P/M/F to serve bank AAs. The bonds represent districts where a majority of students qualify for free or reduced school lunch programs.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Borger non-MSA and College Station-Bryan MSA is weaker than the bank’s overall performance under the Investment Test in the full-scope areas based on the level of investments. Performance in the Austin MSA was stronger than the bank’s overall performance under the Investment Test due to the higher volume of CD investments measured against allocated tier one capital. Performance in limited-scope AAs had a neutral impact on the overall Investment Test rating.

### Service Test

The bank’s performance under the Service Test in Texas is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Amarillo MSA is excellent. Performance in the Lubbock MSA is good. Primary weight was placed on performance in the Amarillo MSA since 57 percent of branches were in this AA.

### Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
<b>Full-Scope:</b>													
Amarillo MSA	81.2	17	56.7	5.9	41.2	29.4	23.5	0.0	2.2	29.4	36.7	31.7	0.0
Lubbock MSA	13.1	7	0.0	0.0	14.2	42.9	42.9	0.0	5.6	22.0	39.9	32.5	0.0
<b>Limited-Scope:</b>													
Borger non-MSA	2.2	1	3.3	0.0	100.0	0.0	0.0	0.0	0.0	8.7	32.3	59.1	0.0
Austin MSA	0.9	1	3.3	0.0	0.0	0.0	100.0	0.0	10.1	22.3	37.3	29.2	1.1
College Station-Bryan MSA	2.7	4	13.4	0.0	0.0	75.0	25.0	0.0	10.4	29.7	30.4	25.7	3.8
<i>Source: 2015 ACS and bank data. Due to rounding, totals may not equal 100%.</i>													

During the COVID-19 Pandemic, ANB offered additional services such as curbside banking, delivering documents to those uncomfortable getting out, cashing stimulus checks for non-customers, and offering leniency on waiving non-sufficient funds and overdraft fees, and early withdrawal penalties.

Amarillo MSA

Service delivery systems are readily accessible to geographies and individuals of different income levels. The distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living in those geographies.

The bank offers alternative delivery systems including four deposit-taking ATMs, online banking, online bill payment, mobile banking, mobile deposit capture, and Bank-by-Phone. ATM customers have additional access to Allpoint ATMs at no charge worldwide. The bank also offers Resettlement Refugee Accounts which allows refugees to access banking products with sponsorship of Catholic Charities of the Texas Panhandle (CCTP). These individuals may not have complete identification to open an account at ANB but with verification of the CCTP, they may open an account and have access to banking services. We did not place significant weight on alternative delivery systems as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of low- and moderate-income individuals.

Lubbock MSA

Service delivery systems are reasonably accessible to portions of the AA, particularly LMI geographies and individuals. The distribution of branches in moderate-income geographies was below the percentage of population living in these geographies. ANB did not have any branches in low-income geographies.

The bank offers alternative delivery systems including four deposit-taking ATMs, online banking, online bill payment, mobile banking, mobile deposit capture, and Bank-by-Phone. ATM customers have additional access to Allpoint ATMs at no charge worldwide. We did not place significant weight on alternative delivery systems as the bank did not maintain or provide metrics to determine their effectiveness in helping meet the needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
<b>Full-Scope:</b>							
Amarillo MSA	1	1	0	0	0 *	0	0
Lubbock MSA	1	1	0	+1	0	-1	0
<b>Limited-Scope:</b>							
Borger non-MSA	0	0	0	0	0	0	0
Austin MSA	0	0	0	0	0	0	0
College Station-Bryan MSA	0	0	0	0	0	0	0
* Bank opened one branch and closed one branch.							

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

### Amarillo MSA

In 2020, the bank closed a drive-up branch and opened a branch in the same middle-income tract during the evaluation period. A majority of branches have the same business hours. Fourteen branches have extended hours on Friday hours, including four located in moderate-income tracts and the United branch located in a low-income tract. The United branch is located within a grocery store. Eleven branches and one drive-up branch have Saturday banking hours, including three branches in moderate-income tracts. Two branches have Sunday drive-up hours.

### Lubbock MSA

In the Lubbock MSA AA, the bank closed a branch in an upper-income CT in 2019. In 2020 opened a branch in a moderate-income CT, which improved accessibility of the bank's delivery systems in moderate-income geographies. Except for the Parkway branch, all branches have the same business hours Monday – Thursday. The Parkway branch is located within a grocery store in a moderate-income geography and offers extended hours. Two branches offer extended hours on Friday and Saturday, including the Parkway branch.

## **Community Development Services**

The institution provides a relatively high level of CD services. We considered the impact of the COVID-19 pandemic on the bank's ability to provide CD services.

### Amarillo MSA

ANB provided a relatively high level of CD services in the AA. During the evaluation period, bank officers and employees provided a total of 3,108 community development service hours to at least 81 different qualifying organizations in the AA, frequently in positions of leadership. Employees shared their financial expertise by serving as board members, officers, and on fundraising committees that help provide affordable housing, economic development opportunities, and community services to low- and moderate-income individuals and families. This included teaching financial literacy to students within the Amarillo Independent School District. Examples of CD services in the AA include:

- Serving as mentors to small business owners and working with a local foundation to establish a Community Development Financial Institution (CDFI). The CDFI works with partners to find small business loan prospects.
- Volunteering with an organization that provides food and clothing assistance to those in need. An employee uses their financial expertise to serve as Director of the food pantry.
- Serving on boards and various committees with an agency that funds programs that help with basic health, education, and income needs. Bank employees also help with fundraising campaigns.

### Lubbock MSA

ANB provided a relatively high level of CD services in the AA. During the evaluation period, officers and employees performed approximately 995 community development service hours to at least 14 different qualifying organizations in the AA, frequently in positions of leadership. Employees shared their financial expertise by serving as board members, officers, and on fund-raising committees that help provide affordable housing, economic development opportunities, and community services to low- and moderate-income individuals and families. This included teaching financial literacy to students within the Lubbock Independent School District. Examples of CD services in the AA include:

- Financial literacy training for an organization that provides education and outreach assistance to low-income, non-English speaking, elderly or disabled individuals. These services help them achieve self-sufficiency.
- Serving on the Board of a food bank that provides assistance to those experiencing food insecurity.

### **Conclusions for Areas Receiving a Limited-Scope Review**

Based on limited-scope reviews, the bank's performance under the Service Test in the Borger non-MSA, Austin MSA, and College Station-Bryan MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. Weaker performance is due to the limited number of branches in the Borger non-MSA and Austin MSA AAs. Weaker performance in the College Station-Bryan MSA is due to the lack of branches in low- and moderate-income tracts. Performance in limited-scope AAs had a neutral impact on the overall Service Test rating

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	January 1, 2018 to December 31, 2020	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Texas</b>		
Amarillo, TX MSA	Full-scope	All of Potter and Randall counties
Lubbock, TX MSA	Full-scope	All of Lubbock county
Austin-Round Rock-Georgetown, TX MSA	Limited-scope	Entire MSA
College Station-Bryan, TX MSA	Limited-scope	Entire MSA
Borger, TX non-MSA	Limited-scope	Hutchinson County

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>				
<b>Amarillo National Bank</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Amarillo National Bank	Outstanding	High Satisfactory	Outstanding	Outstanding
<b>MMSA or State:</b>				
Texas	Outstanding	High Satisfactory	Outstanding	Outstanding

*(\*)The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.*

## Appendix C: Definitions and Common Abbreviations

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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/assessment area.

**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 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 LMI 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):** 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, 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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 investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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/assessment area.

**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.

**MMSA (state):** 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.

**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 multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state 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.

**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

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### 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 loans are treated the same 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

*[Note: Examiners may delete descriptions for tables not included in the PE (e.g. Tables S and T if small farm lending is not reviewed). Examiners may not re-letter the remaining tables.]*  
*[Note: Examiners may delete descriptions for tables not included in the PE (e.g. Tables S and T if small farm lending is not reviewed). Examiners may not re-letter the remaining tables.]*

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

- Table O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - 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 compared 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 assessment area.
- Table R. 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - 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 compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. 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 assessment area.

**Table T. 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 thousand) 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2018-2020**

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
Amarillo MSA	4,683	838,720	84.6	9,479	1.0	0.2	0.2	22.9	10.1	8.7	34.8	28.2	30.9	41.3	61.5	60.1	0.0	0.0	0.0
Borger non-MSA	269	31,265	4.9	384	0.0	0.0	0.0	5.4	4.8	3.4	30.2	19.7	20.8	64.4	75.5	75.8	0.0	0.0	0.0
Lubbock MSA	585	114,092	10.6	14,524	2.5	1.4	1.2	16.4	7.0	7.5	38.2	39.8	41.3	42.9	51.8	50.1	0.0	0.0	0.0
<b>Total</b>	<b>5,537</b>	<b>984,076</b>	<b>100.0</b>	<b>24,387</b>	<b>1.7</b>	<b>0.3</b>	<b>0.8</b>	<b>18.9</b>	<b>9.5</b>	<b>7.9</b>	<b>36.2</b>	<b>29.0</b>	<b>36.9</b>	<b>43.2</b>	<b>61.2</b>	<b>54.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2018 — 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, “—” data not available.

Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2018-2020**

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
Amarillo MSA	4,683	838,720	84.6	9,479	22.0	6.0	3.2	17.0	15.2	11.3	19.7	22.6	16.9	41.3	53.0	36.9	0.0	3.2	31.6
Borger non-MSA	269	31,265	5.1	384	20.2	5.2	4.2	13.3	11.2	10.2	19.0	19.3	15.9	47.5	65.1	41.4	0.0	0.9	28.4
Lubbock MSA	585	114,092	12.9	14,524	22.1	3.9	2.6	16.4	12.0	11.1	19.5	16.9	17.4	41.9	54.5	45.7	0.0	13.4	23.1
<b>Total</b>	<b>5,537</b>	<b>984,076</b>	<b>100.0</b>	<b>24,387</b>	<b>22.0</b>	<b>5.7</b>	<b>2.9</b>	<b>16.6</b>	<b>14.6</b>	<b>11.2</b>	<b>19.6</b>	<b>21.8</b>	<b>17.2</b>	<b>41.9</b>	<b>53.8</b>	<b>42.2</b>	<b>0.0</b>	<b>4.1</b>	<b>26.5</b>

Source: 2015 ACS Census ; 01/01/2018 — 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, “—” data not available.  
 Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2018-20**

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
Amarillo MSA	4,246	452,191	87.2	7,801	5.6	6.8	4.9	24.0	27.1	19.5	30.3	31.7	29.1	39.9	34.4	45.0	0.2	0.0	1.5
Borger non-MSA	208	17,140	4.3	382	0.0	0.0	0.0	19.8	22.1	15.8	34.2	42.8	32.0	46.0	35.1	49.8	0.0	0.0	2.3
Lubbock MSA	418	39,031	8.6	8,031	3.5	3.3	2.9	15.2	17.0	13.2	36.1	35.4	35.1	45.1	44.3	48.0	0.1	0.0	0.7
<b>Total</b>	<b>4,872</b>	<b>508,362</b>	<b>100.0</b>	<b>16,214</b>	<b>4.2</b>	<b>6.2</b>	<b>3.6</b>	<b>18.8</b>	<b>26.0</b>	<b>15.8</b>	<b>33.8</b>	<b>32.5</b>	<b>32.6</b>	<b>43.1</b>	<b>35.3</b>	<b>46.9</b>	<b>0.1</b>	<b>0.0</b>	<b>1.1</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2018-20**

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
Amarillo MSA	4,246	452,191	87.2	7,801	84.3	45.7	36.0	4.5	27.6	11.2	26.6
Borger non-MSA	208	17,140	4.3	382	72.6	44.2	40.9	5.8	34.6	21.7	21.2
Lubbock MSA	418	39,031	8.6	8,031	86.1	46.7	33.2	3.9	19.4	10.0	34.0
<b>Total</b>	<b>4,872</b>	<b>508,362</b>	<b>100.0</b>	<b>16,214</b>	<b>85.1</b>	<b>45.8</b>	<b>34.5</b>	<b>4.2</b>	<b>27.2</b>	<b>10.7</b>	<b>27.0</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2018-20**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Amarillo MSA	194	30,274	98.0	358	2.5	2.3	0.0	12.2	8.7	4.6	27.4	14.0	26.8	58.0	48.5	67.6	0.0	0.0	1.1
Borger non-MSA	1	75	1.5	28	0.0	0.0	0.0	9.5	0.0	0.0	61.9	100.0	28.6	28.6	0.0	71.4	0.0	0.0	0.0
Lubbock MSA	3	637	2.3	452	1.5	0.0	0.4	8.5	0.0	2.0	35.2	0.0	36.4	54.8	150.0	60.9	0.0	0.0	0.2
<b>Total</b>	<b>198</b>	<b>30,986</b>	<b>100.0</b>	<b>838</b>	<b>1.8</b>	<b>2.2</b>	<b>0.3</b>	<b>9.9</b>	<b>8.6</b>	<b>2.9</b>	<b>32.8</b>	<b>14.2</b>	<b>32.5</b>	<b>55.5</b>	<b>48.9</b>	<b>63.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.5</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2018-20**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Amarillo MSA	194	30,274	98.0	358	94.8	63.4	65.5	3.9	17.5	1.3	19.1
Borger non-MSA	1	75	0.5	28	95.2	100.0	60.7	4.8	0.0	0.0	0.0
Lubbock MSA	3	637	1.5	452	96.7	100.0	46.6	2.3	0.0	1.1	0.0
<b>Total</b>	<b>198</b>	<b>30,986</b>	<b>100.0</b>	<b>838</b>	<b>95.9</b>	<b>64.1</b>	<b>54.1</b>	<b>2.9</b>	<b>17.2</b>	<b>1.1</b>	<b>18.7</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2019-20</b>	
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Austin MSA	55	41,341	26.1	155,425	3.8	3.6	3.3	18.1	12.7	13.4	40.3	32.7	41.5	37.6	50.9	41.6	0.2	0.0	0.1	
College Station-Bryan MSA	156	42,595	73.9	9,257	2.4	1.9	3.0	21.4	20.5	16.7	36.8	27.6	31.3	39.3	50.0	49.0	0.0	0.0	0.0	
<b>Total</b>	<b>211</b>	<b>83,937</b>	<b>100.0</b>	<b>164,682</b>	<b>3.7</b>	<b>2.4</b>	<b>3.3</b>	<b>18.4</b>	<b>18.5</b>	<b>13.6</b>	<b>39.9</b>	<b>28.9</b>	<b>40.9</b>	<b>37.8</b>	<b>50.2</b>	<b>42.1</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>	
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>																				
<i>AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate</i>																				

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2019-20**

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	55	41,341	26.1	155,425	22.5	3.6	3.5	16.9	8.3	14.9	19.8	5.5	20.1	40.8	63.6	45.4	0.0	23.6	16.0
College Station-Bryan MSA	156	42,595	73.9	9,257	24.3	4.7	1.4	16.3	7.7	9.2	17.7	9.0	16.4	41.8	65.4	56.6	0.0	16.7	16.3
<b>Total</b>	<b>211</b>	<b>83,937</b>	<b>100.0</b>	<b>164,682</b>	<b>22.7</b>	<b>1.9</b>	<b>3.4</b>	<b>16.8</b>	<b>6.6</b>	<b>14.6</b>	<b>19.5</b>	<b>8.1</b>	<b>19.9</b>	<b>40.9</b>	<b>64.9</b>	<b>46.1</b>	<b>0.0</b>	<b>18.5</b>	<b>16.1</b>

Source: 2015 ACS Census ; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-20
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	181	30,083	37.0	65,170	6.1	7.2	7.1	12.8	9.4	14.0	34.9	28.2	34.1	45.0	50.8	43.2	1.2	4.4	1.6
College Station-Bryan MSA	308	35,032	63.0	5,550	7.1	2.9	5.0	22.3	20.5	24.6	33.4	29.9	31.5	36.9	46.8	37.5	0.3	0.0	1.3
<b>Total</b>	<b>489</b>	<b>65,115</b>	<b>100.0</b>	<b>70,720</b>	<b>6.2</b>	<b>4.5</b>	<b>7.0</b>	<b>13.4</b>	<b>16.4</b>	<b>14.8</b>	<b>34.8</b>	<b>29.2</b>	<b>33.9</b>	<b>44.5</b>	<b>48.3</b>	<b>42.8</b>	<b>1.2</b>	<b>1.6</b>	<b>1.5</b>

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-20
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	181	30,083	37.0	65,170	89.7	45.3	39.2	3.1	19.9	7.2	34.8	
College Station-Bryan MSA	308	35,032	63.0	5,550	83.0	34.7	41.4	4.1	19.2	12.9	46.1	
<b>Total</b>	<b>489</b>	<b>65,115</b>	<b>100.0</b>	<b>70,720</b>	<b>89.3</b>	<b>38.7</b>	<b>39.4</b>	<b>3.2</b>	<b>19.4</b>	<b>7.6</b>	<b>41.9</b>	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-20
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Austin MSA	4	763	80.0	383	4.4	0.0	2.1	16.5	0.0	27.0	40.2	0.0	41.3	38.4	200.0	27.8	0.4	0.0	1.8
College Station-Bryan MSA	1	243	33.3	175	4.1	0.0	3.9	13.5	0.0	9.5	42.0	0.0	52.5	40.4	100.0	31.3	0.0	0.0	2.8
<b>Total</b>	<b>5</b>	<b>1,006</b>	<b>100.0</b>	<b>558</b>	<b>4.4</b>	<b>0.0</b>	<b>2.7</b>	<b>16.2</b>	<b>0.0</b>	<b>21.5</b>	<b>40.5</b>	<b>0.0</b>	<b>44.9</b>	<b>38.6</b>	<b>166.7</b>	<b>28.9</b>	<b>0.3</b>	<b>0.0</b>	<b>2.1</b>

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-20
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Austin MSA	4	763	80.0	383	96.9	100.0	54.0	1.7	0.0	1.4	0.0	
College Station-Bryan MSA	1	243	20.0	175	96.0	0.0	58.7	1.2	0.0	2.8	100.0	
<b>Total</b>	<b>5</b>	<b>1,006</b>	<b>100.0</b>	<b>558</b>	<b>96.8</b>	<b>80.0</b>	<b>55.5</b>	<b>1.6</b>	<b>0.0</b>	<b>1.6</b>	<b>20.0</b>	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

AMARILLO NATIONAL BANK (10000014206) excluded from Aggregate



