



PUBLIC DISCLOSURE

August 16, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Mint National Bank
Charter Number 24827

1213 Kingwood Drive
Kingwood, TX 77339

Office of the Comptroller of the Currency

909 Fannin Street, Suite 1900
Houston, TX 7701

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 major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are inside its assessment area (AA).
- The geographic distribution of business loans reflects excellent dispersion.
- The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.
- The bank did not have any complaints related to compliance with the Community Reinvestment Act (CRA).

Loan-to-Deposit Ratio

The LTD ratio is more than reasonable. As of March 31, 2021, the bank's quarterly LTD ratio since the prior CRA evaluation averaged 100.6 percent. We compared this ratio to four similarly situated institutions, all located within the bank's AA, with total assets ranging from \$144 million to \$411 million. For the same evaluation period, the average quarterly ratio of this peer group was 82.2 percent, ranging from a low of 67.7 percent to a high of 97.6 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA).

The bank originated and purchased 65.3 percent of its total sampled loans inside the its AA during the evaluation period. This percentage does not include loans originated under the Small Business Administration's (SBA) Payment Protection Program (PPP). The bank originated 861 PPP loans in 2020. A substantial majority of these loans were outside of the AA. However, 211 of these loans made outside the AA were made in the state of New Jersey. The bank has a loan production office (LPO) in South Plainfield, New Jersey, but does not have a branch location in that area. Adjusting to include those PPP loans generated from the New Jersey LPO would increase the in/out ratio to 56 percent, although technically, New Jersey is not in their AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
2018-2020 Commercial	64	65.3	34	34.7	98	64,731	56.3	50,312	43.7	115,043
2020 PPP loans	271	31.5	590	68.5	861	36,292	34.9	67,715	65.1	104,007
Total	335	34.9	624	65.1	959	101,023	46.1	118,027	53.9	219,050

Description of Institution

The Mint National Bank (MNB) is a community bank chartered in January 2009 and headquartered in Kingwood, Texas. In August 2016, MNB became a wholly-owned subsidiary of The MINT Holdings, Inc. Kingwood is a community within the city of Houston, Texas and is mostly located in Harris County, with some areas located in Montgomery County. Kingwood is located approximately 23 miles northeast of downtown Houston.

As of December 31, 2020, MNB had \$371 million in total assets. During the evaluation period, the bank's headquarters was the only full service location, also known as a commercial banking office. The bank also offers full service online banking as a convenience to its customers. The bank's headquarters is located in an upper-income census tract (CT). In addition to its commercial banking office, the bank also has five LPOs located in Houston, The Woodlands, Memorial, Sugar Land, Texas, as well as in South Plainfield, New Jersey. These offices are not considered branch locations. The LPOs offer commercial equipment purchase loans, commercial real estate mortgage loans, SBA commercial loans, and commercial construction loans. The majority of the bank's loan portfolio, 77 percent based on dollar volume and 82 percent based on number of loans, consists of commercial loans. The LPO in South

Plainfield, New Jersey was declared the bank's SBA Loan Division in December 2015. MNB has an established presence in the community primarily as a commercial lender, while providing limited retail lending products. There is an effort by management to meet the small business needs within its AA. This coincides with the bank's overall business strategy of focusing on small business term loans used for the acquisition, refinancing and improvement of business facilities.

The bank does not have any automated teller machines (ATMs), drive-through facilities, or teller counters. Because of this, the bank reimburses customer's ATM fees when accessing cash through other institution's ATMs. The bank offers an array of standard deposit products, loan products, and services to help meet the credit needs of its community. Banking hours are reasonable with lobby hours of 9:00 AM to 4:00 PM Monday through Friday. We did not identify any legal or financial impediments to the bank's ability to meet the credit needs of its AA.

The bank was rated "Satisfactory" at its last CRA evaluation dated June 12, 2017.

Please refer to the bank's Public File for additional information.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We conducted an evaluation of MNB to ensure compliance with the CRA within the bank's AA. MNB was evaluated under the Small Bank examination procedures, which includes the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. This examination evaluated the bank's lending performance from January 1, 2018 through December 31, 2020.

We identified and focused our review on the bank's primary loan product, which is commercial loans. Commercial loans make up the majority share of the bank's loan portfolio by both number and dollar amount of loans. As of December 31, 2020, business loans represented 77 percent of the dollar amount of the portfolio and 82 percent of the total number of loans. The concentration of business lending is a part of the bank's overall business strategy.

MNB is not required to collect and report business loan data under the CRA. We selected a statistically valid sample of the bank's commercial loans to analyze the bank's lending practices for this product. We sampled 20 loans originated in 2018, 20 loans originated in 2019, and 58 loans originated in 2020. The 58 loans originated in 2020 represented the entire population of commercial loans for that year, excluding PPP loans. The PPP loans were a special SBA loan product developed in response to the 2020 COVID-19 pandemic. We performed an analysis of the PPP loans, separate from the other commercial loans. This analysis was of the 271 loans located in the bank's AA.

The bank has designated the entire Houston-The Woodlands-Sugarland metropolitan statistical area (MSA) as its only AA. A full-scope review was conducted on all loans in the AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that 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 Texas

Description of Institution's Operations in Houston-The Woodlands-Sugarland Metropolitan Statistical Area (Houston MSA)

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston-The Woodlands-Sugarland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CT)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	613,033	9.3	17.9	23.1	49.5	0.2
Farms by Geography	9,440	4.9	16.4	30.8	47.8	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA – 26420- Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$172,974
			Median Gross Rent			\$972
			Families Below Poverty Level			12.8%
<i>Source: 2020 ACS Census and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

We made two community contacts in the AA during the evaluation period. One community service organization stated the AA community development needs as financial literacy, affordable housing, vehicle loans to low- and moderate-income (LMI) persons, and food and services targeted to LMI persons. A local area development corporation defined additional needs for small business loans ranging from \$5,000 to \$50,000.

LENDING TEST

The bank's performance under the Lending Test in the Houston MSA is Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the Houston MSA.

Small Loans to Businesses

Geographic distribution of business loans reflects excellent dispersion. The percentage of loans originated in low-income CTs significantly exceeds both the percentage of businesses in the AA and aggregate comparators. The percentage of loans originated in moderate-income CTs is comparable to both the percentage of businesses in the AA and aggregate comparators.

Geographic distribution of PPP loans reflects excellent dispersion. The percentage of loans originated in low-income CTs significantly exceeds both the percentage of businesses in the AA and aggregate comparators. The percentage of loans originated in moderate-income CTs is somewhat lower than both the percentage of businesses in the AA and aggregate comparators.

Refer to Table Q in 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 and PPP loans.

Lending Gap Analysis

The bank has excellent dispersion for business loans in low-and-moderate income tracts and good dispersion for PPP loans. There were no unexplained conspicuous gaps identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Distribution of loans to businesses of different sizes reflects reasonable dispersion. During the evaluation period, 59.3 percent of the bank's business loans were made to small businesses. This is below the percentage of businesses in the AA with revenues less than \$1 million at 87.9 percent. However, it significantly exceeds the aggregate comparator of 44.9 percent. The analysis of the PPP loans reflected similar performance.

Refer to Table R in 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 and PPP loans.

Responses to Complaints

The bank did not receive any CRA-related complaints 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:	01/01/2018 – 12/31/2020	
Bank Products Reviewed:	Commercial (business) loans and SBA PPP loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Texas – Houston-The Woodlands-Sugarland MSA	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS: The Mint National Bank	
Overall Bank:	Lending Test Rating
State of Texas	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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 non-MSA 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.

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 CT delineated by the U.S. Bureau of the Census in the most recent decennial census.

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 CT 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/AA 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 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 (MD): 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 MD 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 (MSA): 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 MSA 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.

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 multistate MSA (MMSA). 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 MMSA, the institution will receive a rating for the MMSA.

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 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

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas (MMSA), 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 Federal Deposit Insurance Corporation 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 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 AA.
- 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2018-2020		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$(000)	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston-Commercial loans	98	115,043	100	9.3	14.1	9.8	17.9	18.8	18.0	23.1	43.8	23.5	49.5	23.4	48.5	0.2	0.0	0.1
Houston – PPP loans	271	36,292	100	9.3	15.1	9.8	17.9	13.7	18.0	23.1	26.9	23.5	49.5	43.9	48.5	0.2	0.4	0.1
Total	369	151,335	100	9.3	14.6	9.8	17.9	16.25	18.0	23.1	35.35	23.5	49.5	33.65	48.5	0.2	0.2	0.1

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-2020	
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	
Houston – Commercial loans	98	115,043	100	185,435	87.9	59.3	44.9	4.4	40.6	7.7	0.0	
Houston – PPP loans	271	36,292	100	185,435	87.9	56.8	44.9	4.4	42.4	7.7	0.7	
Total	369	151,335	100	185,435	87.9	58.05	44.9	4.4	41.5	7.7	0.7	