



**PUBLIC DISCLOSURE**

September 22, 2025

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The First National Bank and Trust Co.  
Charter Number: 5547  
302 Chickasha Avenue  
Chickasha, OK 73023

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

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

## Contents

Overall CRA Rating .....	1
Description of Institution .....	2
Scope of the Evaluation .....	2
Discriminatory or Other Illegal Credit Practices Review .....	3
State Rating .....	4
State of Oklahoma .....	4
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of MMSA and State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations .....	C-1
Appendix D: Tables of Performance Data .....	D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Outstanding**

The major factors that support this rating include:

- The Lending Test rating is based on one full-scope and one limited-scope assessment area (AA), both in the state of Oklahoma.
- The First National Bank and Trust Company's (FNBT or bank) loan-to-deposit (LTD) ratio was reasonable and averaged 58.6 percent since the prior performance evaluation.
- A majority of the bank's loans were originated inside the AAs during the evaluation period.
- The distribution of loans to individuals of different income levels and businesses of different sizes was reasonable.
- The geographic distribution of loans was reasonable.
- The Community Development (CD) Test rating is based on one full-scope and one limited-scope AA, both in the state of Oklahoma.
- The bank exhibited excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was reasonable. FNBT's quarterly average from March 31, 2021 through June 30, 2025 was 58.6 percent. Examiners compared FNBT's LTD ratio to four similarly situated banks in their market areas. The comparative banks' LTD ratios ranged from 55.6 percent to 74.2 percent with an aggregate average LTD ratio of 62.2 percent.

### Lending in Assessment Area

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

The bank originated and purchased 80.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	231	80.77	55	19.23	286	36,683	76.89	11,024	23.11	47,707
Small Business	36	81.82	8	18.18	44	3,662	77.58	1,058	22.42	4,720
<b>Total</b>	267	80.91	63	19.09	330	40,345	76.95	12,082	23.05	52,427

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

## Description of Institution

FNBT is a \$1 billion institution headquartered in Chickasha, Oklahoma. The bank is a wholly owned subsidiary of First Independent Bancorp, Incorporated, a one-bank holding company. The main bank is located at 302 Chickasha Avenue in Chickasha, Oklahoma. FNBT has eight full-service branches and one walk-up branch, all located in Oklahoma and within its AAs. Each of the branch locations have drive-in facilities that provide extended hours of operation, as well as Saturday hours. The bank has 14 ATMs. Since the previous CRA evaluation, FNBT has opened a full-service branch in Goldsby, Oklahoma.

FNBT's primary focus is to serve commercial, consumer, and agricultural customers within its AAs and surrounding communities. FNBT meets these needs by providing various types of loan and deposit products and services, as well as internet banking with bill-pay, mobile banking, automated clearing house, trust, and cash management services. Traditional loan products are offered such as consumer, home purchase, refinance and home improvement, business, agricultural, and commercial loans. As of December 31, 2024, tier 1 capital was \$129.9 million, and loans totaled \$504.5 million or 49.6 percent of total assets. The loan portfolio consists of \$330.6 million in commercial loans, \$97.1 million in residential real estate loans, \$29.3 million in agricultural loans, \$8.7 million in consumer loans, and \$38.8 million in other loans.

There are no known legal, financial, or other factors impeding management's ability to help meet the credit needs of the designated AA. The bank earned a rating of "Outstanding" in its November 30, 2021, CRA PE.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of FNBT's CRA activities, under the Intermediate Small Bank CRA procedures, which includes the lending test and the CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments and donations, and services. The evaluation period includes all reported activity from January 1, 2022, to December 31, 2024. The bank's primary loan products are home mortgage and business loans. The evaluation considers home mortgage and business loans originated and purchased during the evaluation period and the bank's community development loans, qualified investments, and community development service activities during the evaluation period.

Conclusions regarding the lending test are based on home mortgage loans reported on the HMDA loan application register for 2022, 2023, and 2024 and on samples of business loans originated in 2022, 2023, and 2024. Due to the low number of business loans originated in the limited scope Oklahoma Non-MSA, examiners did not sample business loans in that AA. Conclusions regarding the CD test are based on the bank's CD activities during the same period.

There were no Office of Management and Budget changes in the AAs during the evaluation period.

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

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

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

FNBT has one rating area, the state of Oklahoma, and two assessment areas, the Oklahoma City Partial MSA and Oklahoma Non-MSA. The Oklahoma City Partial MSA accounts for approximately 96.9 percent of the bank’s total loans and deposits, so this AA received a full-scope review while the Oklahoma Non-MSA received a limited-scope review.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under each state and MMSA 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 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

## State Rating

### State of Oklahoma

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

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflected reasonable distribution of loans to low- and moderate-income (LMI) tracts for home mortgage and small business lending.
- The distribution of loans to individuals of different incomes and businesses of different sizes was reasonable.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

### Description of Institution's Operations in Oklahoma

The bank operates nine branches and 14 ATMs in the two AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending in addition to the traditional suite of loan and deposit products to meet the needs of their community. Primary loan products in both AAs were similar over the evaluation period, so we assessed the same loan products in each AA.

#### Oklahoma City Partial MSA

The Oklahoma City Partial MSA AA consists of 137 census tracts (CTs), including 76 CTs in Oklahoma County, 37 CTs in Canadian County, all 15 CTs in Grady County, and 9 CTs in McClain County. In this AA, there are seven low-income CTs, 31 moderate-income CTs, 51 middle-income CTs, and 43 upper income CTs. The downtown Chickasha branch (the bank's main branch) is located in a moderate-income CT. Two other branches are located in moderate-income CTs, two branches are located in middle-income CTs, and four branches are located in upper-income CTs.

Competition in the Oklahoma City Partial MSA is strong with 67 other financial institutions in the areas, including several large regional banks. Based on FDIC Deposit Market Share data as of December 31, 2024, FNBT holds 1.7 percent of the market share of deposits and is ranked 7<sup>th</sup> among financial institutions in the AA.

The OCC reviewed a community contact completed during the evaluation period. The contact noted strong job and population growth in the Oklahoma City metro area. Major industries in the area include healthcare, retail trade, technical jobs, and manufacturing. Cost of living in the Oklahoma City metro area is generally considered affordable, although the contact noted that small business and startup loans continue to be a need in the area.

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

Assessment Area(s) – Oklahoma City Partial MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	137	5.11	22.63	37.23	31.39	3.65
Population by Geography	499,083	4.19	20.67	37.57	36.34	1.23
Housing Units by Geography	192,640	4.48	22.76	39.30	31.59	1.88
Owner-Occupied Housing by Geography	116,837	2.42	15.79	40.78	39.81	1.20
Occupied Rental Units by Geography	57,617	7.66	34.15	36.21	19.10	2.88
Vacant Units by Geography	18,186	7.62	31.47	39.56	18.34	3.00
Businesses by Geography	20,476	2.73	22.36	35.95	36.55	2.40
Farms by Geography	1,036	2.70	20.56	37.93	38.22	0.58
Family Distribution by Income Level	117,110	19.89	18.00	20.62	41.49	0.00
Household Distribution by Income Level	174,454	22.49	16.16	19.01	42.35	0.00
Unemployment rate (%)	4.09	7.39	5.55	3.88	3.04	6.82
Households Below Poverty Level (%)	11.43	34.30	17.94	9.52	5.35	33.15
Median Family Income (36420 - Oklahoma City, OK MSA)		\$75,170			Median Housing Value	\$154,100
Median Family Income (36420 - Oklahoma City, OK MSA) for 2024		\$89,100			Median Gross Rent	\$857
					Families Below Poverty Level	9.10
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Oklahoma

Based on the volume of deposits and loans originated during the evaluation period, the Oklahoma City Partial MSA will be evaluated under full-scope procedures whereas the Oklahoma Non-MSA will be evaluated under limited-scope procedures.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Oklahoma was reasonable.

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

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

### *Home Mortgage Loans*

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

The percentage of bank loans in moderate-income CTs is below the percentage of owner-occupied housing units but exceeds the aggregate distribution of loans in the AA.

FNBT originated no mortgages in low-income CTs during the evaluation period. Opportunity to lend to low-income tracts is limited as only 5.1 percent of tracts in the AA are low-income. Furthermore, just 4.5 percent of housing units in the AA are in low-income tracts and homeownership in the AA is 2.4 percent in low-income tracts.

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

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

The percentage of bank loans to small businesses in low-income CTs exceeds both the percentages of businesses located in those geographies and the aggregate lending level. The percentage of bank loans in moderate-income CTs is significantly below both the percentage of businesses located in those geographies and the aggregate lending level.

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

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

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

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

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

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

The percentage of bank loans to low-income borrowers was below the percentage of low-income families, but the bank's percentage of loans exceeded the aggregate percentage of lending. The percentage of bank loans to moderate-income borrowers was near to the percentage of moderate-income families in the AA and the aggregate percentage of lending.

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

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

The percentage of bank loans to small businesses with revenues of less than or equal to \$1 million was well below the percentage of businesses identified as having revenues of less than or equal to \$1 million but exceeded the aggregate lending for those businesses.

## Responses to Complaints

The bank did not have any CRA related complaints during the evaluation period.

## Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank did not have enough home mortgage or small business loans in the Oklahoma Non-MSA to perform a meaningful analysis.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Oklahoma is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in the state through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

## Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Oklahoma City Partial MSA	25	100.00	56,544	100.00
Oklahoma Non-MSA	0	0.00	0	0.00

During the evaluation period, FNBT made 25 qualified CD loans in the AA totaling \$56.5 million, which represented 44.9 percent of allocated tier 1 capital.

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank made a \$9.8 million loan to build a fire station in a local community that services surrounding LMI areas.
- The bank originated a \$12.3 million loan to finance new construction and renovations for a local school district, which has a majority of low-income students.
- The bank made a \$5.1 million loan for the construction of a retail business that will create more than 16 LMI jobs.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City Partial MSA	47	6,853	31	13,616	79	86.81	20,469	79.64	0	0
Oklahoma Non-MSA	0	0	3	432	3	3.30	432	1.68	0	0
Broader Statewide or Regional Area	0	0	9	4,800	9	9.89	4,800	18.68	0	0
Total	47	6,853	43	18,848	91	100.00	25,701	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FNBT made 31 qualifying CD investments and donations in the Oklahoma City Partial MSA, which represented 10.8 percent of allocated tier 1 capital. The bank also had 47 prior period investments totaling \$6.9 million in the AA.

The following are examples of qualified investments in the AA:

- The bank made five investments totaling \$2.7 million for the building of new schools and storm shelters in a local school district where a majority of students qualify for free or reduced lunch programs. The bank invested \$800,000 to finance the construction, repair, and rehabilitation of flood-control dams.
- The bank purchased two municipal bonds totaling \$1.4 million for the construction of a new middle school in a local school district where a majority of students are low-income.

### *Broader Statewide or Regional Area*

In addition to CD investments that benefit the bank's AAs, FNBT made nine investments totaling \$4.8 million in the broader statewide or regional area.

## Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 10,579.5 qualified service hours to 65 different organizations. These service hours supported community services, economic development, and revitalization/stabilization within the AA.

The following are examples of CD services in the AA:

- Seven bank employees provided over 1,500 qualified service hours to a local organization that provides support for small businesses in the AA.
- Bank employees provided 68 qualified service hours to support financial literacy in three local school districts where a majority of students qualify for free or reduced lunch programs.
- A senior executive volunteered on a non-profit committee, providing 82 qualified service hours to support economic development and the expansion of infrastructure in a local community.

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

## **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review the bank's performance under the CD Test in the Oklahoma Non-MSA was weaker than the bank's overall performance under the CD Test in the full scope AA.

## 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 MSA(s) and non-MSA(s) 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>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<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>
Oklahoma		
Oklahoma City Partial MSA	Full-scope	
Oklahoma Non-MSA	Limited-scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank & Trust Co.	Satisfactory	Outstanding	Outstanding
MMSA or State:			
Oklahoma	Satisfactory	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight 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 the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Oklahoma Non-MSA	3	68	1.30	237	--	--	--	--	--	--	100.00	100.00	100.00	--	--	--	--	--	--
Oklahoma City Partial MSA	228	36,615	98.70	48,825	2.42	--	1.47	15.79	12.72	12.44	40.78	65.79	36.32	39.81	21.49	49.09	1.20	--	0.68
<b>Total</b>	<b>231</b>	<b>36,683</b>	<b>100.00</b>	<b>49,062</b>	<b>2.39</b>	<b>--</b>	<b>1.47</b>	<b>15.58</b>	<b>12.55</b>	<b>12.38</b>	<b>41.57</b>	<b>66.23</b>	<b>36.62</b>	<b>39.27</b>	<b>21.21</b>	<b>48.85</b>	<b>1.19</b>	<b>--</b>	<b>0.67</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Oklahoma Non-MSA	3	68	1.30	237	19.79	--	5.91	18.95	33.33	16.46	22.91	33.33	22.78	38.36	--	32.91	--	33.33	21.94
Oklahoma City Partial MSA	228	36,615	98.70	48,825	19.89	11.40	6.02	18.00	16.23	16.42	20.62	21.93	20.13	41.49	28.95	30.04	--	21.49	27.39
<b>Total</b>	<b>231</b>	<b>36,683</b>	<b>100.00</b>	<b>49,062</b>	<b>19.89</b>	<b>11.26</b>	<b>6.02</b>	<b>18.01</b>	<b>16.45</b>	<b>16.42</b>	<b>20.64</b>	<b>22.08</b>	<b>20.14</b>	<b>41.46</b>	<b>28.57</b>	<b>30.05</b>	<b>--</b>	<b>21.65</b>	<b>27.37</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Oklahoma City Partial MSA	36	3,662	100.00	21,470	2.73	11.11	2.22	22.36	2.78	16.99	35.95	66.67	34.38	36.55	19.44	44.87	2.40	0.00	1.54
<b>Total</b>	<b>36</b>	<b>3,662</b>	<b>100.00</b>	<b>21,470</b>	<b>2.73</b>	<b>11.11</b>	<b>2.22</b>	<b>22.36</b>	<b>2.78</b>	<b>16.99</b>	<b>35.95</b>	<b>66.67</b>	<b>34.38</b>	<b>36.55</b>	<b>19.44</b>	<b>44.87</b>	<b>2.40</b>	<b>0.00</b>	<b>1.54</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma City Partial MSA	36	3,662	100.00	21,470	82.86	63.89	54.47	7.77	25.00	9.37	11.11
<b>Total</b>	<b>36</b>	<b>3,662</b>	<b>100.00</b>	<b>21,470</b>	<b>82.86</b>	<b>63.89</b>	<b>54.47</b>	<b>7.77</b>	<b>25.00</b>	<b>9.37</b>	<b>11.11</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%