



PUBLIC DISCLOSURE

August 4, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Stride Bank, National Association
Charter Number: 12044

324 West Broadway
Enid, OK 73701

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

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

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Overall CRA Rating

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

The following table indicates the performance level of Stride Bank, National Association (Stride or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Stride Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory			
Needs to Improve		X	X
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 on good performance in the state of Oklahoma and poor performance in the state of Utah. Home mortgage loans carried the greatest weight in making overall conclusions. The level of community development (CD) lending had a neutral impact on lending performance in the state of Oklahoma.
- The Investment Test rating is based on poor performance in the state of Oklahoma and very poor performance in the state of Utah. Current and prior period investments represent less than one percent of total tier 1 capital.
- The Service Test rating is based on poor performance in the state of Oklahoma rating area and poor performance in the state of Utah rating area. Service delivery systems were reasonably accessible to portions of the assessment areas (AAs), particularly low- and moderate-income (LMI) geographies. The bank provided few, if any, CD services in the AAs, which had a negative impact on service performance.

The OCC recognizes the bank's secured credit card program as a non-innovative but flexible product offered by the bank through a fintech relationship. The bank offers the card nationally to customers with limited or no credit history or applicants looking to improve their credit history. No underwriting is performed. The product is offered to all customers with a deposit account through a specific fintech relationship. The secured credit card does not incur any recurring fees, annual charges, or interest. The borrower establishes a secured deposit account as collateral. There is no pre-set credit limit. Borrowers can increase the credit line by depositing funds into their secured deposit account. As of June 30, 2024, the bank had the following committed and outstanding secured credit card loan amounts in each rating area:

- Oklahoma – \$21.5 million committed and \$18.1 million outstanding.
- Utah – \$2.2 million committed and \$1.8 million outstanding.

This flexible product had a neutral impact on the rating since bank management elected to not include consumer loans in this evaluation.

Lending in Assessment Areas

An adequate percentage of the bank's loans are in its AAs.

The bank originated and purchased 43.88 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. The bank operated 10 loan production offices (LPOs), with six of them being located outside the bank's AAs and five of the six offices concentrating on home mortgage lending.

Loans originated inside the bank's AAs are considered for the geographic and borrower income distribution analyses under the Lending Test.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024		
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	1,964	39.27	3,037	60.73	5,001	488,657	35.17	900,686	64.83	1,389,343		
*Small Business	683	65.17	365	34.83	1,048	114,534	56.94	86,606	43.06	201,140		
*Small Farm	389	44.71	481	55.29	870	37,509	35.79	67,298	64.21	104,807		
Total	3,036	43.88	3,883	56.12	6,919	640,700	37.79	1,054,590	62.21	1,695,290		

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%.

*The total number of small business and small farm loans do not match the Tables of Performance Data in Appendix D since this table required a random sampling of 2022 small business loan and small farm loans to supplement the 2023 and 2024 data reported in the CRA loan application register. Additional small business and small farm loans were then sampled for statistically significant information for the AAs for the Tables of Performance Data in Appendix D.

Description of Institution

Stride is a multi-state financial institution headquartered in Enid, Oklahoma, which is located in north-central Oklahoma. Although headquartered in Enid, Oklahoma, most of the senior staff operate out of the Tulsa, Oklahoma branch. The bank is a subsidiary of Central Service Corporation, a three-entity holding company headquartered in Enid, Oklahoma. Subsidiaries of the holding company include Stride (wholly owned), CSC Capital Corporation (wholly owned/inactive), and Central Service Capital Trust I (an unconsolidated subsidiary established to issue trust preferred securities). Stride also has three wholly owned subsidiaries, including CSC Insurance Agency, Inc, Central Registration Co. of Enid LLC, and CSC Enid Properties, LLC. Activities in the bank subsidiaries were not considered in the evaluation.

The bank is strategically segregated into two separate business units. The first business unit is the traditional, community bank consisting of local deposits and conventional loans. Loans are generated in local markets, but lenders have numerous contacts in outside markets, including through the LPOs. The second business unit embodies the third-party service provider relationships with financial technology companies who assist the bank in marketing, promoting, and servicing the bank's products nationwide. The products primarily consist of prepaid cards, deposit accounts with debit cards, and secured credit cards. The majority of Stride's card program income is derived from a significant fintech relationship, which resulted in significant asset growth starting in 2020.

As of December 31, 2024, Stride reported \$3.9 billion in total assets, \$3.3 billion in net loans and leases (84.5 percent of total assets), and \$300.8 million in tier 1 capital. As a percentage of gross loans and leases as of December 31, 2024, the bank's loan portfolio comprised 53.91 percent individual loans,

34.86 percent real estate loans, 7.46 percent in commercial loans, 3.71 percent in agricultural loans, and 0.06 percent other loans. The real estate loan portfolio consists of 57.62 percent non-farm non-residential, 20.87 percent one- to-four family residential, 9.68 percent construction and development, 8.99 percent farmland, and 2.83 percent multifamily. Individual loans represent the largest loan portfolio segment due to Stride's secured credit cards offered through a fintech company.

As of December 31, 2024, the bank operated eight branches in Oklahoma and one branch in Utah. The main office and one branch were in the Enid MSA, four branches were in the Oklahoma Non-MSA, one branch was in the Oklahoma City MSA, and one branch was in the Tulsa MSA. The branch in Utah is located in the Salt Lake City MSA AA. Refer to appendix A for information about how the AAs are comprised. The Tulsa, Oklahoma City, and Salt Lake City branches do not offer drive-up banking. Bank lobby hours are provided Monday through Friday at all locations, with three locations offering Saturday hours. The bank operated 12 non-deposit taking automated teller machines (ATMs), all located in Oklahoma. The bank did not operate any deposit-taking ATMs.

The bank offered a full range of retail and commercial deposit products across all locations in Oklahoma and Utah. The bank offered a full range of retail and commercial lending products across all locations in Oklahoma. Both the Enid market and the Oklahoma Non-MSA markets in Woodward, Kay, and Washington counties focus on a mix of commercial and agricultural lending. The Salt Lake City branch does not offer loan products. The consumer lending products offered through the fintech relationships did incidentally include consumer loans to borrowers located in the Salt Lake City MSA AA. The bank had seven LPOs in Oklahoma, one in Kansas, one in Missouri, and one in Texas. The bank participated in the Small Business Administration (SBA) 7(a) program during the evaluation period, including SBA Express loan program. The bank participated in United States Department of Agriculture and Farm Service Agency loan programs. The bank also had a Wealth Management Department in Enid, Oklahoma that served customers across all bank locations.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. The bank received an overall rating of "Satisfactory" at the last CRA evaluation dated January 31, 2022, under the Intermediate Small Bank test.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank using Large Bank performance criteria, which includes a lending test, investment test, and service test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The investment and service tests evaluate the bank's responsiveness to CD needs in its AAs. The evaluation period is January 1, 2022, through December 31, 2024. In evaluating the bank's lending performance, the OCC assessed home mortgage loans reported under the Home Mortgage Disclosure Act and assessed small loans to businesses and farms reported under the Community Reinvestment Act. Since the bank was an intermediate small bank for 2022 and did not report small farm loans and small business loans for that year, the OCC supplemented the 2023 and 2024 reported data by sampling 2022 small loans to businesses and farms. Those figures are included in the applicable tables. Bank management elected not to have the OCC consider consumer loans in this evaluation.

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 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 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 a blend of the state ratings, and where applicable, multistate ratings. In arriving at overall conclusions, the state of Oklahoma carried the greatest weight as it accounts for 99.95¹ percent of total bank deposits and 100 percent of bank’s loans originated in the AA².

The state ratings in rating areas with a single AA are based on performance in that AA. The state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the “Scope” section under each 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 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 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 Consumer Financial Protection Bureau, 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.

¹ According to the June 30, 2024, FDIC Summary of Deposits reports, the bank’s AAs in Oklahoma total 99.99 percent of the bank’s deposits. After adjusting the deposit to remove the national fintech relationship deposits from the Enid, Oklahoma branch, the bank’s AAs in Oklahoma total 99.95 percent of the bank’s deposits.

² Includes home mortgages loans, business loans, and farm loans. Bank management elected not to include consumer loans in this evaluation.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The distribution of loans among borrowers of different income levels and businesses of different sizes was good. The distribution of loans in LMI geographies in the AA was adequate. Home mortgage loans carried the greatest weight.
- The bank's CD lending had a neutral impact on the Lending Test. The bank made a relatively high level of CD loans in the Oklahoma AAs based on dollars. However, the bank did not make any CD loans in two of the full-scope AAs.
- The bank had a poor level of CD investments.
- Service delivery systems were reasonably accessible to portions of the AAs, particularly moderate-income geographies; however, the bank provided few, if any, CD services in the AAs, which had a negative impact on service performance.

Description of Institution's Operations in Oklahoma

The bank designated four AAs in Oklahoma, including the Enid MSA, Oklahoma City MSA, Tulsa MSA, and the Oklahoma Non-MSA. The Enid MSA comprises the entirety of Garfield County. The Oklahoma City MSA comprises 331 contiguous geographies of the total 374 geographies in Canadian, Cleveland, and Oklahoma counties. The Tulsa MSA comprises 138 contiguous geographies out of the total 208 geographies in Tulsa County. The Oklahoma Non-MSA comprises the entirety of Washington and Woodward Counties and three contiguous geographies of the 11 geographies in Kay County, all of which were combined for analysis purposes.

According to the June 30, 2024, FDIC Summary of Deposits reports, the bank's branches in Oklahoma totaled 99.99 percent of the bank's deposits. After adjusting deposits to remove the national fintech relationship deposits from the Enid branch, the bank's AAs in Oklahoma total 99.95 percent of the bank's deposits. Branch offices in Oklahoma represent 88.89 percent of the bank's total branches.

The bank faced competition primarily from local and regional institutions in the state of Oklahoma. According to the June 30, 2024, FDIC Deposit Market Share Report in the state of Oklahoma, the bank had \$3.7 billion in deposits with a deposit share of 2.7 percent, ranking eighth out of 201 banks in the state. That report included Stride deposits obtained through fintech relationships, which accounted for \$3.1 billion.

Enid MSA

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

Assessment Area(s) - Enid MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	5.88	11.76	52.94	29.41	0.00
Population by Geography	62,846	5.07	10.06	56.17	28.70	0.00
Housing Units by Geography	26,776	6.36	10.37	54.69	28.57	0.00
Owner-Occupied Housing by Geography	15,501	3.22	7.68	54.33	34.77	0.00
Occupied Rental Units by Geography	8,208	11.60	14.19	53.63	20.58	0.00
Vacant Units by Geography	3,067	8.18	13.79	59.37	18.65	0.00
Businesses by Geography	2,113	0.76	6.39	62.75	30.10	0.00
Farms by Geography	166	0.00	3.01	52.41	44.58	0.00
Family Distribution by Income Level	15,145	21.99	14.96	21.27	41.78	0.00
Household Distribution by Income Level	23,709	25.12	14.58	20.25	40.06	0.00
Unemployment rate (%)	4.91	11.81	7.34	4.00	4.23	0.00
Households Below Poverty Level (%)	13.48	46.31	26.79	11.09	6.65	0.00
Median Family Income (21420 - Enid, OK MSA)	\$65,663			Median Housing Value	\$115,300	
Median Family Income (21420 - Enid, OK MSA) for 2024	\$66,500			Median Gross Rent	\$832	
				Families Below Poverty Level	12.22	
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						

The Enid MSA is in north central Oklahoma and includes all of Garfield County. The bank operated two branches and seven non-deposit taking ATMs in the AA during the evaluation period. According to the FDIC's Deposit Market Share Report as of June 30, 2024, the bank ranked first out of 14 banks with a deposit market share of 74.86 percent. The report allocates the deposits obtained through national fintech relationships to the Enid, Oklahoma branch. Without those deposits, the bank would rank second with a deposit market share of 21.68 percent.

Employment and Economic Factors

Oklahoma's Enid MSA employment sector is diverse. According to a Moody's analytics report, the top employers in the region include Vance Air Force Base, Tyson Foods, and St. Mary's Regional Medical Center. Most employees work in the government sector followed by education and health services, then retail trade. The area lacks high-wage income outside of mining. Per capita income is nearly 30 percent below that of the national average and approximately 15 percent below the Oklahoma average.

According to the U.S. Bureau of Labor Statistics, the Enid MSA unemployment rate ranged from a low of 2.3 percent to a high of 3.8 percent throughout the evaluation period. No increasing or decreasing trend was identified. In January 2022, the rate was 2.9 percent compared to 2.8 percent in December 2024. The unemployment rate in the Enid MSA was slightly lower than the overall rate for the state of Oklahoma, which was 3 percent at the end of the evaluation period.

According to the demographic table above, the unemployment rate in the AA included 11.81 percent in low-income geographies and 7.34 percent in moderate-income census tracts, reflecting a difficulty for LMI borrowers being able to qualify for a home mortgage loan.

Housing Characteristics

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than \$32,832 in 2022 and 2023, and \$33,250 in 2024, and moderate-income families earned less than \$52,530 in 2022 and 2023, and \$53,200 in 2024. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income for the AA. According to Federal Reserve Economic Data, the average monthly median housing listing price in the Enid MSA was \$197,126 in 2022 and 2023, and \$224,015 in 2024. One method to determine housing affordability

assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between \$821 and \$831 for a low-income borrower and between \$1,313 and \$1,330 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing listing price would be \$1,058 for 2022 and 2023 and \$1,203 for 2024. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

The poverty level across the AA was also 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 capability to qualify for a home loan than those with income above the poverty level. For this AA, 12.22 percent of families were living below the poverty level.

Community Contacts

The OCC reviewed a community contact completed during the evaluation period. Based on the contact's knowledge, banks are involved with the community, and the credit needs of women and minorities are being met. The contact mentioned a need for housing and farm loans in the area.

Oklahoma Non-MSA

The following table provides a summary of demographics, including housing and business information for the Oklahoma Non-MSA for the evaluation period.

Assessment Area(s) - Oklahoma Non-MSA								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	22	0.00	18.18	50.00	31.82	0.00		
Population by Geography	84,268	0.00	11.75	55.69	32.56	0.00		
Housing Units by Geography	38,944	0.00	13.25	57.17	29.57	0.00		
Owner-Occupied Housing by Geography	23,189	0.00	8.05	55.98	35.97	0.00		
Occupied Rental Units by Geography	9,644	0.00	19.75	60.02	20.23	0.00		
Vacant Units by Geography	6,111	0.00	22.76	57.19	20.05	0.00		
Businesses by Geography	3,052	0.00	15.69	46.99	37.32	0.00		
Farms by Geography	246	0.00	10.16	57.72	32.11	0.00		
Family Distribution by Income Level	21,066	17.49	15.74	18.62	48.15	0.00		
Household Distribution by Income Level	32,833	18.59	15.04	17.97	48.41	0.00		
Unemployment rate (%)	5.13	0.00	9.85	4.69	4.19	0.00		
Households Below Poverty Level (%)	12.93	0.00	24.24	14.21	6.43	0.00		
Median Family Income (Non-MSAs - OK)	\$58,565			Median Housing Value	\$104,800			
Median Family Income (Non-MSAs - OK) for 2024	\$69,000			Median Gross Rent	\$724			
				Families Below Poverty Level	10.88			
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								

The Oklahoma Non-MSA included four branches and four non-deposit taking ATMs in the AA during the evaluation period. According to the FDIC's Deposit Market Share Report as of June 30, 2024, the bank ranked ninth out of 21 banks with a deposit market share at 4.36 percent.

Employment and Economic Factors

Oklahoma's employment sector is diverse. According to a Moody's analytics report, most employees work in the government sector followed by education and health services, then professional and business services sector. Total employment in the state during the evaluation period grew by 5.67 percent.

Oklahoma is one of the largest producers of oil and natural gas in the United States, and many leading energy firms have their corporate headquarters in Oklahoma.

According to the U.S. Bureau of Labor Statistics, the Oklahoma unemployment rate ranged from a low of 2.5 percent to a high of 3.7 percent throughout the evaluation period. No increasing or decreasing trend was identified. In January 2022, the rate was 3.3 percent compared to 3 percent in December 2024.

According to the demographic table above, the unemployment rate in the AA was 9.85 percent in moderate-income geographies, reflecting a difficulty for even moderate-income borrowers being able to qualify for a home mortgage loan.

Housing Characteristics

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than \$29,283 in 2022 and 2023, and \$34,500 in 2024, and moderate-income families earned less than \$46,852 in 2022 and 2023, and \$55,200 in 2024. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income for the AA. According to Federal Reserve Economic Data, the monthly average median housing listing price in the Oklahoma was \$287,521 in 2022 and 2023, and \$297,541 in 2024. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between \$732 and \$863 for a low-income borrower and between \$1,171 and \$1,380 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing listing price would be \$1,543 for 2023 and 2023 and \$1,597 for 2024. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

The poverty level across the AA was also 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 capability to qualify for a home loan than those with income above the poverty level. For this AA, 10.88 percent of families were living below the poverty level.

Community Contacts

The OCC reviewed a community contact completed during the evaluation period. The contact, in their opinion, believes the banks in the area are meeting the banking needs of the community.

Oklahoma City MSA

The following table provides a summary of demographics, including housing and business information for the Oklahoma City MSA for the evaluation period.

Assessment Area(s) - Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	331	8.46	27.49	32.02	26.28	5.74
Population by Geography	1,089,129	7.06	25.20	34.80	30.95	1.99
Housing Units by Geography	449,394	7.40	27.17	35.58	28.03	1.81
Owner-Occupied Housing by Geography	243,170	4.56	20.45	35.97	37.84	1.18
Occupied Rental Units by Geography	164,435	10.36	35.01	35.96	16.16	2.50
Vacant Units by Geography	41,789	12.27	35.45	31.84	17.63	2.80
Businesses by Geography	52,029	5.67	23.85	32.25	35.31	2.91
Farms by Geography	1,736	5.24	23.62	30.82	38.94	1.38
Family Distribution by Income Level	252,230	22.03	17.99	20.31	39.68	0.00
Household Distribution by Income Level	407,605	24.42	17.27	18.39	39.91	0.00
Unemployment rate (%)	4.68	7.91	5.87	4.31	3.10	12.67
Households Below Poverty Level (%)	13.89	31.32	20.16	11.54	5.97	31.27
Median Family Income (36420 - Oklahoma City, OK MSA)	\$75,170				Median Housing Value	\$143,200
Median Family Income (36420 - Oklahoma City, OK MSA) for 2024	\$89,100				Median Gross Rent	\$902
					Families Below Poverty Level	10.25

FFIEC File - 2020 Census
 FFIEC File - 2024 Census
 2024 Dun & Bradstreet SBSF Demographics
 Due to rounding, totals may not equal 100.00%
 (*) The NA category consists of geographies that have not been assigned an income classification

The Oklahoma City MSA included one branch and no ATMs. The bank ranked 62nd out of 67 banks with a deposit market share of 0.06 percent.

Employment and Economic Factors

Oklahoma City's employment sector is diverse. According to a Moody's analytics report, the top employers in the region include Tinker Airforce Base, University of Oklahoma-Norman, and Integris Health. Most employees work in the government sector followed by education and health services, then professional and business services sector.

The Oklahoma City MSA labor market experienced consistent growth during the evaluation period. According to the U.S. Bureau of Labor Statistics, total employment in the Oklahoma City MSA grew between January 2022 and December 2024 by 7.88 percent. The unemployment rate ranged from a low of 2.3 percent to a high of 3.4 percent throughout the evaluation period. In January 2022, the rate was 3 percent compared to 2.8 percent in December 2024. No increasing or decreasing trend was identified. The unemployment rate in the MSA was slightly lower than the overall rate for the state of Oklahoma, which was 3 percent at the end of the evaluation period.

According to the demographic table above, the unemployment rate in the AA was 7.91 percent in low-income geographies and 5.87 percent in moderate-income geographies, reflecting a difficulty for LMI borrowers being able to qualify for a home mortgage loan.

Housing Characteristics

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than \$37,585 in 2022 and 2023, and \$44,550 in 2024, and moderate-income families earned less than \$60,136 in 2022 and 2023, and \$71,280 in 2024. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income for the AA. According to Federal Reserve Economic Data, the monthly average median housing listing price in the Oklahoma MSA was \$331,850 in 2022 and 2023 and \$320,346 in 2024. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between \$940 and \$1,114 for a low-income borrower and between

\$1,503 and \$1,782 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing listing price would be \$1,781 for 2022 and 2023 and \$1,720 for 2024. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

The poverty level across the AA was also 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 capability to qualify for a home loan than those with income above the poverty level. For this AA, 10.25 percent of families were living below the poverty level.

Community Contacts

The OCC reviewed three community contacts completed during the evaluation period. One contact stated the housing inventory in the area continues to increase due to the rapid population growth. Even though the housing inventory has increased, the contact stated that prices have not substantially increased. The contact stated that entrepreneurship is increasing in the Oklahoma City area and hopes to see more credit opportunities for entrepreneurs.

Another contact stated that there is a very low amount of small farm lending which has resulted in a low demand for it. The contact stated that most farmland is being sold for development and housing, and many small farms have transitioned into manufacturing land or residential usage. The contact stated that the lending demand is now focused on small business lending and small business grants.

Scope of Evaluation in Oklahoma

For the state of Oklahoma, we completed full-scope reviews on the Enid MSA, Oklahoma Non-MSA, and Oklahoma City MSA. Ratings are based primarily on results of the full-scope areas. The Enid MSA and the Oklahoma Non-MSA were chosen for full-scope reviews based on the number of branch locations and representing 79.77 percent of deposits in Oklahoma. The Enid MSA and the Oklahoma Non-MSA also represent 98.10 percent of the small loans to farms by number. The Oklahoma City MSA was chosen as it represents 81.57 percent of state home mortgage loans by number and represents 54.96 percent of home mortgage loans and small loans to businesses and farms by number in Oklahoma. Examiners placed more emphasis on home mortgage loans than small loans to businesses and farms in arriving at the overall conclusions as they represent the majority of Stride's lending by both dollar and number in this rating area. In multiple AAs, the volume of farm lending during the evaluation period was insufficient (less than 20 loans) to conduct a meaningful analysis.

In the Oklahoma Non-MSA, there were no low-income geographies in the bank's AA. For the analysis of distribution of loans to geographies with different income levels, consideration was given to the bank's performance in moderate-income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Enid MSA, Oklahoma City MSA, and Oklahoma Non-MSA was good.

Lending Activity

Lending levels reflected a good responsiveness to the AAs credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Enid MSA**	76	209	102	0	387	12.45	56.18	
Oklahoma Non-MSA	90	256	312	0	658	21.17	23.59	
Oklahoma City MSA	1,602	97	7	1	1,707	54.92	5.88	
Tulsa MSA	196	156	1	3	356	11.45	14.35	
Total	1,964	718	422	4	3,108	100.00	100.00	
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Enid MSA**	11,765	28,069	12,560	0	52,394	7.21	56.18	
Oklahoma Non-MSA	13,845	19,606	26,105	0	59,556	8.20	23.59	
Oklahoma City MSA	407,373	35,800	594	34,000	477,767	65.74	5.88	
Tulsa MSA	55,674	40,129	98	41,113	137,014	18.85	14.35	
Total	488,657	123,604	39,357	75,113	726,731	100.00	100.00	

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

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

**The percent rating area deposits are calculated using FDIC Market Share Deposit Report and removing the fintech relationship deposits that are reported in the Enid AA.

Enid MSA

According to the FDIC's Deposit Market Share Report as of June 30, 2024, the bank ranked first out of 14 banks with a deposit market share of 74.86 percent. The report allocates the deposits obtained through national fintech relationships to the Enid, Oklahoma branch. Without those deposits, the bank would rank second with a deposit market share of 21.68 percent.

For home mortgage loans, the bank's market share of 1.35 percent ranked 18th out of 115 lenders. The top three lenders were Gateway First Bank with 11.16 percent market share, US Bank, N.A. with a 7.02 percent market share, and PrimeLending with a 6.34 percent market share.

For small loans to businesses, the bank's market share of 10.98 percent ranked fourth out of 42 banks. The top three banks were Synchrony Bank with a 19.57 percent market share, American Express National Bank with a 17.62 percent market share, and JPMorgan Chase Bank USA, N.A. with a 14.76 percent market share.

For small loans to farms, the bank ranked first out of 13 banks with a market share of 33.61 percent. The next three top banks included Interbank with a market share of 18.03 percent, John Deere Financial, F.S.B. with a market share of 18.03 percent, and JPMorgan Chase, N.A. with a market share of 7.38 percent.

Oklahoma Non-MSA

The bank ranked ninth out of 21 banks with a deposit market share at 4.36 percent. For home mortgage loans, the bank's market share of 1.36 percent ranked 20th out of 180 lenders. The top three lenders were Arvest Bank with 8.87 percent market share, Truity Federal Credit Union with a 7.69 percent market share and, PennyMAC Loan Servicers with a 4.79 percent market share.

For small loans to businesses, the bank's market share of 5.73 percent ranked sixth out of 51 banks. The top three banks were American Express National Bank with a 15.25 percent market share, Synchrony Bank with a 12.64 percent market share, and JPMorgan Chase Bank, N.A. with an 11.99 percent market share.

For small loans to farms, the bank ranked second out of 17 banks with a market share of 20.13 percent. The top banks are BancFirst with a market share of 20.8 percent, Equity Bank ranked third with 14.31 percent, and RCB Bank ranked fourth with 12.48 percent market share.

Oklahoma City MSA

The bank ranked 62nd out of 67 banks with a deposit market share of 0.06 percent. For home mortgage loans, the bank's market share at 1.89 percent ranked 13th out of 459 lenders. The top three lenders were First United Bank and Trust Co. with a 4.85 percent market share, US Bank, N.A, with a 4.8 percent market share, and Amerihome Mortgage Company with a 4.15 percent market share.

For small loans to businesses, the bank's market share of 0.13 percent ranked 37th out of 118 lenders. The top three banks were JPMorgan Chase Bank, N.A. with a 24.38 percent market share, American Express National Bank with a 23.51 percent market share, and Capital One, N.A. with a 7.37 percent market share.

For small loans to farms, the bank ranked 10th out of 25 banks with a market share of 1.52 percent. The three top banks included BancFirst with a market share of 30.05 percent, JPMorgan Chase, N.A. with a market share of 25 percent, and John Deere Financial, F.S.B. with a market share of 9.85 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs.

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 bank exhibits an adequate geographic distribution of home mortgage loans in the Oklahoma AAs.

Enid MSA

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units and exceeded the aggregate percentage of all reporting lenders. However, only 3.22 percent of owner-occupied housing is located in low-income tracts, representing 499 units, and 7.68 percent in moderate-income tracts, representing 1,190 units, impeding the bank's ability to make loans in LMI areas.

Oklahoma Non-MSA

No low-income geographies exist in the AA. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units and near to the aggregate percentage of all reporting lenders.

Oklahoma City MSA

The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units and below the aggregate percentage of all reporting lenders. Only 4.56 percent of owner-occupied housing is located in low-income geographies, however, this represents 11,088 units. Competition is strong in the AA with the bank having only 0.06 percent of the deposit market share and 1.89 percent of the home mortgage market share.

Small Loans to Businesses

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

The bank exhibits an adequate geographic distribution of small loans to businesses in the Oklahoma AAs.

Enid MSA

The percentage of small loans to businesses originated in low-income geographies was well below the percentage of small businesses and well below aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income geographies exceeded both the percentage of business and aggregate percentage of all reporting lenders. Only 0.76 percent of businesses are located in low-income tracts and 6.39 percent in moderate-income tracts, representing 16 and 135 businesses, respectively.

Oklahoma Non-MSA

No low-income tracts exist in the AA. The percentage of small loans to businesses originated in moderate-income geographies was well below the percentage of business and below aggregate

percentage of all reporting lenders. Competition is strong in the AA with the bank having only 4.36 percent of the deposit market share.

Oklahoma City MSA

The percentage of small loans to businesses originated in low-income geographies exceeded both the number of small businesses and aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated in moderate-income geographies was below the percentage of business and near to the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 11 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 farms.

The bank exhibits an adequate geographic distribution of small loans to farms in the Oklahoma AAs.

Enid MSA

There is no population of farms located in low-income tracts in this AA. The bank made no small loans to farms in the moderate-income tract, however, only 3.01 percent of farms in the AA are located in moderate-income tracts in the AA and no aggregate lending information was available.

Oklahoma Non-MSA

No low-income tracts exist in this AA. The percentage of small loans to farms originated in the moderate-income geographies was well below the demographics and below the aggregate lending. Only 10.16 percent of farms were located in moderate-income tracts, presenting limited lending opportunities. Competition is strong in the AA with 21 banks competing for loans with the bank ranked at ninth in deposit market share with 4.4 percent of the deposit market share.

Oklahoma City MSA

The bank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis. Only 5.24 percent of farms are located in low-income tracts. Competition is strong with the bank ranking 62nd out 67 banks in deposit market share with 0.06 percent market share in the AA.

Lending Gap Analysis

Examiners analyzed the bank's lending patterns and reviewed summary reports and maps of home mortgage loans, small loans to businesses, and small loans to farms to identify any gaps in the geographic distribution of loans in the AAs. Examiners focused on clusters of LMI census tracts with no lending in the AAs, and evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

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 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 bank exhibits a good borrower distribution of home mortgage loans in the Oklahoma AAs. The OCC considered challenges LMI borrowers would likely encounter to qualify and afford home mortgage financing, as previously discussed.

Enid MSA

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders. Home affordability to low-income borrowers is difficult due to the median listing price for the evaluation period exceeding borrower's ability to afford principal and interest payments alone. Competition is strong in the AA for borrowers.

Oklahoma Non-MSA

The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders. Home affordability to low-and moderate-income borrowers is difficult due to the median listing price for the evaluation period exceeding borrower's ability to afford principal and interest payments alone.

Oklahoma City MSA

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders. Home affordability to low and moderate-income borrowers is difficult due to the median listing price for the evaluation period exceeding borrower's ability to afford principal and interest payments alone.

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 origination and purchase of small loans to businesses.

The bank exhibits an adequate borrower distribution of small loans to businesses in the Oklahoma AAs.

Enid MSA

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses and near to the aggregate percentage of all reporting lenders.

Oklahoma Non-MSA

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses and below the aggregate percentage of all reporting lenders.

Oklahoma City MSA

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and the aggregate percentage of all reporting lenders.

Small Loans to Farms

Refer to Table 12 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 bank exhibits an adequate borrower distribution of small loans to farms in the Oklahoma AAs.

Enid MSA

The percentage of small loans to farms with gross revenues of less than \$1 million was near to the percentage of farms and exceeded the aggregate percentage of all reporting lenders.

Oklahoma Non-MSA

The percentage of small loans to farms with gross revenues of less than \$1 million was below the percentage of farms and near to the aggregate percentage of all reporting lenders.

Oklahoma City MSA

The bank did not originate a sufficient of volumes of small loans to farms to conduct a meaningful analysis.

Community Development Lending

Stride made a relatively high dollar level of CD loans in its state of Oklahoma AAs but did not make any CD loans in two of the AAs. CD lending had a neutral impact on performance.

Refer to Table 3 in the Lending Activity section for 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.

Within its state of Oklahoma AAs, and including the Tulsa MSA limited-scope AA, Stride originated four CD loans totaling \$75.1 million which represents 24.98 percent of allocated tier 1 capital. By dollar volume, 79.7 percent of CD loans in the Oklahoma AAs funded economic development and 20.3 percent

funded affordable housing. The bank also originated six CD loans in Oklahoma outside its designated AAs. These loans totaled \$33.8 million which represents 11.23 percent of allocated tier 1 capital.

The following is an example of a CD loan the bank originated or purchased in the full-scope AAs:

- The bank originated a \$34 million commercial real estate loan in Oklahoma City for the construction of an eight-story commercial office building. The building is located in a designated Oklahoma City Development Zone and is within the city's Innovation District. The Oklahoma City Innovation District is a non-profit organization with a mission of revitalizing the city through job growth in the health care, aerospace, biomanufacturing, and technology industries.

Product Innovation and Flexibility

The institution made no use of innovative and/or flexible home mortgage, small business, or small farm lending practices in order to serve AA credit needs.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 12 in the state of Oklahoma section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the Tulsa MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank's performance under the Investment Test in Oklahoma is rated Needs to Improve.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Enid MSA, Oklahoma Non-MSA, and Oklahoma City MSA was poor. The institution had a poor level of qualified investments, including grants, particularly those that are not routinely provided by private investors.

The institution exhibited poor responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Enid MSA	1	195	38	1,101	39	28.26	1,296	79.51	0	0
Oklahoma Non-MSA	1	220	72	50	73	52.90	270	16.56	0	0
Oklahoma City MSA	0	0	17	27	17	12.32	27	1.66	0	0
Tulsa MSA	0	0	9	37	9	6.52	37	2.27	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	2	415	136	1,215	138	100.00	1,630	100.00	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Total qualified investments in the state of Oklahoma AAs, including the Tulsa MSA, amounted to \$1.63 million. This included one current period investment of \$1 million, two prior period investments with a

book value of \$414,745, and qualified grants of \$190,352. Together, current and prior period qualified investments represent less than one percent of allocated tier 1 capital for Oklahoma. Additionally, qualified investments represent less than one percent of allocated tier 1 capital for each AA.

The following are examples of qualified investments in the AA:

- Purchase of a \$1 million affordable housing bond in the Enid MSA. The bond supported construction of a 50-unit apartment complex accepting HUD Section 8 rental subsidies. All units are designated for residents earning less than 80 percent of area median income.
- Purchase of a \$220,000 bond in the Oklahoma Non-MSA supporting Bartlesville Public Schools. There are nine schools in the district, with an average of 52 percent of students eligible for the free or reduced cost lunch program.
- A grant totaling \$2,500 in the Oklahoma City MSA AA dedicated to addressing the needs of the area's unhoused.
- Fifty-six grants totaling \$31,000 to district school systems within the combined Oklahoma AAs. All donations were made to schools for which the majority of students are eligible for the free or reduced cost lunch program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Tulsa MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Oklahoma is rated Needs to Improve.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's performance in the Enid MSA and Oklahoma City MSA was poor. Based on a full-scope review, the bank's performance in the Oklahoma Non-MSA was adequate.

Examiners analyzed the percentage of deposits in each AA to allocate a fair weight in considering the overall state rating. Refer to Table 5 below for the percent of rated area deposits in each AA used in calculating this weight. The Enid MSA has the most deposits and received the greatest weight in the overall conclusion.

Retail Banking Services

Service delivery systems were reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals.

Table 5: Distribution of Branch Delivery Systems

2024

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	
Enid MSA **	56.18	2	25.00	0.00	0.00	50.00	50.00	0	5.07	10.06	56.17	28.70	0.00
Oklahoma Non-MSA	23.59	4	50.00	0.00	0.00	25.00	75.00	0	0.00	11.75	55.69	32.56	0.00
Oklahoma City MSA	5.88	1	12.50	0.00	0.00	0.00	100.00	0	7.06	25.20	34.80	30.95	1.99
Tulsa MSA	14.35	1	12.50	0.00	0.00	0.00	100.00	0	3.93	27.83	26.55	40.96	0.73

Source: FFIEC File – 2020 Census

1/1/2022 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**The percent rating area deposits are calculated using FDIC Market Share Deposit Report minus the fintech relationships deposits that are reported in the Enid AA.

Changes in census data were taken into consideration in determining the adequacy of branch distribution in the AAs. One branch previously located in a moderate-income geography was in a middle-income geography during the evaluation period. Additionally, one branch located in a middle-income geography was in close proximity to a moderate-income geography.

The bank offers free mobile banking and free bill-pay products. Mobile check deposit is free for consumers. Remote deposit capture is available for qualifying business customers. Customers can also access their accounts from outside of the bank's AAs through the Allpoint ATM network, consisting of over 55,000 ATMs. Management opted not to provide data or analysis to determine the alternative delivery systems impact on the availability and effectiveness in delivering retail banking services to LMI individuals or geographies.

No branches were opened or closed during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its customers, particularly LMI geographies and/or individuals.

Community Development Services

The bank provided few, if any, CD services.

Sixteen employees completed 29.5 qualified service hours over the three-year evaluation period in Oklahoma. There were 25.5 hours qualified in the Enid MSA and four hours qualified in the Oklahoma Non-MSA. Most of the qualified service hours were for financial literacy education to schools where a majority of students qualified for free or reduced lunches, which totaled 27.5 hours. One employee served two hours as a treasurer for a local free health clinic in the Oklahoma Non-MSA. Two organizations were served during the assessment period. Neither the Oklahoma City MSA nor the Tulsa MSA had any qualified service hours.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Tulsa MSA was consistent with the bank's overall performance under the Service Test in the Enid MSA and Oklahoma City MSA full-scope areas and was weaker than the performance in the Oklahoma Non-MSA full-scope area.

State of Utah

CRA rating for the State of Utah: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank did not originate or purchase a sufficient number of home mortgage, small business, or small farm loans in the AA to perform a meaningful analysis. The bank made no CD loans in its state of Utah.
- The bank made no CD investments in the state of Utah.
- Service delivery systems were reasonably accessible to portions of the AAs, particularly moderate-income geographies, however, the bank did not provide any CD services, which had a negative impact on service performance.
- The strategic plan for the Utah branch is to support its fintech operations and the bank does not actively market the bank's products or services in the assessment area.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Utah

The bank has one branch in Utah. The branch is in a middle-income geography. The bank does not operate any deposit-taking ATMs in the state of Utah. The bank designated one AA in the state of Utah, which is in the Salt Lake City MSA. The Salt Lake City MSA consists of 15 contiguous geographies of the 251 geographies in Salt Lake County. The bank entered the market to support its prepaid card business and its own prepaid payroll card program and to originate an installment loan program through a fintech relationship located in Salt Lake City, Utah. The bank does not actively solicit deposit accounts in Utah beyond its fintech operations. According to the June 30, 2024, FDIC Deposit Market Share Report in the state of Utah, the bank had \$278,000 in deposits with a deposit share of approximately zero percent, making it the 59th deposit holder out of 60 banks in the state. The bank ranked 50th in total deposits out of 51 banks in the Salt Lake City MSA.

According to 2020 U.S. Census data, the AA consists of 15 geographies, of which there are zero low-income and 10 are moderate-income.

While consumer loans were not considered for analysis in this performance evaluation, examiners recognize the consumer lending products offered through the fintech relationships do incidentally include consumer loans to borrowers located in the Salt Lake City AA. Based on information provided by the bank, the bank had \$1.9 million in outstanding consumer loans in the State of Utah as of June 30, 2024.

Salt Lake City MSA

The following table provides a summary of demographics, including housing and business information for the Salt Lake City MSA for the evaluation period.

Assessment Area(s) - Salt Lake City MSA							2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	15	0.00	66.67	26.67	6.67	0.00	
Population by Geography	62,867	0.00	73.08	23.64	3.28	0.00	
Housing Units by Geography	25,883	0.00	71.72	25.01	3.26	0.00	
Owner-Occupied Housing by Geography	11,323	0.00	78.07	19.98	1.95	0.00	
Occupied Rental Units by Geography	12,270	0.00	69.52	25.40	5.09	0.00	
Vacant Units by Geography	2,290	0.00	52.14	47.86	0.00	0.00	
Businesses by Geography	4,471	0.00	30.64	63.86	5.50	0.00	
Farms by Geography	95	0.00	49.47	47.37	3.16	0.00	
Family Distribution by Income Level	12,321	33.14	26.39	21.09	19.37	0.00	
Household Distribution by Income Level	23,593	35.89	21.23	19.74	23.14	0.00	
Unemployment rate (%)	5.55	0.00	5.55	6.12	1.52	0.00	
Households Below Poverty Level (%)	15.48	0.00	15.91	14.67	11.83	0.00	
Median Family Income (41620 - Salt Lake City-Murray, UT MSA)	\$90,360				Median Housing Value	\$224,600	
Median Family Income (41620 - Salt Lake City-Murray, UT MSA) for 2024	\$115,400				Median Gross Rent	\$997	
					Families Below Poverty Level	14.63	
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							

Employment and Economic Factors

Utah's Salt Lake City employment sector is diverse. Per a Moody's analytics report as of January 2025, the top employers in the region include Intermountain Healthcare, University of Utah, and Walmart Inc. Most employees work in the government sector followed by professional and business services sector, then education and health services. The Salt Lake City MSA benefits from a large concentration of high-wage jobs in technology and knowledge-based industries. It's a low-cost destination for businesses relocating from Silicon Valley.

According to the U.S. Bureau of Labor Statistics total employment grew between January 2022 and December 2024 by 5.7 percent. The Salt Lake City MSA unemployment rate ranged from a low of 2.2 percent to a high of 3.6 percent throughout the evaluation period. No increasing or decreasing trend was identified. In January 2022, the rate was 2.5 percent compared to 3 percent in December 2024. The unemployment rate in the MSA was slightly lower than the unemployment rate for the state of Utah, which was 2.9 percent at the end of the evaluation period.

Housing Characteristics

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. Based on the above table, low-income families earned less than \$45,180 in 2022 and 2023, and \$57,700 in 2024, and moderate-income families earned less than \$72,288 in 2022 and 2023, and \$92,320 in 2024. The maximum low-income and maximum moderate-income annual income calculations are based on 50 percent and 80 percent of the FFIEC adjusted median family income for the AA. According to Federal Reserve Economic Data, the monthly average median housing listing price in the Salt Lake City MSA was \$591,528 in 2022 and 2023, and approximately \$585,648 in 2024. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment

of no more than 30 percent of the applicant's income. For the two analysis periods, the calculated maximum affordable monthly mortgage payment was between \$1,130 and \$1,443 for a low-income borrower and between \$1,807 and \$2,308 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing sale price would be \$3,175 for 2022 and 2023 and \$3,144 for 2024. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

The poverty level across the AA was also 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 capability to qualify for a home loan than those with income above the poverty level. For this AA, 14.63 percent of families were living below the poverty level.

Community Contacts

The OCC reviewed two FDIC led community contact interviews. One contact stated banks are doing what they are supposed to be doing and are good at offering credit for those that meet underwriting standards. The contact mentioned there is a need for affordable housing in the area. The second contact mentioned they are not aware of any discriminatory practices by any area financial institutions. The contact mentioned there is a need for small business financing assistance.

Scope of Evaluation in Utah

For the state of Utah, we completed a full-scope review of the Salt Lake City MSA since it is the only AA in the rating area. Therefore, ratings for the state of Utah are based on results of the full-scope area. The bank did not originate or purchase a sufficient number of home mortgage loans, small business loans, or small farm loans in this AA to perform a meaningful analysis. When evaluating the bank's performance under the CD Test, the bank's business model and strategy were considered due to the limited branch and ATM footprint within the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN UTAH

LENDING TEST

The bank's performance under the Lending Test in Utah is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City AA was poor.

Lending Activity

Lending levels reflected poor responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Salt Lake City	0	0	0	0	0	0.00	0.00	
Total	0	0	0	0	0	0.00	0.00	
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Salt Lake City MSA	0	0	0	0	0	0.00	0.00	
Total	0	0	0	0	0	0.00	0.00	

Source: 1/1/2022 - 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%.

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

Salt Lake City MSA

The bank ranked 50th out of 51 depository institutions with a deposit market share of 0.00 percent. The Salt Lake City branch does not directly offer loan products. The consumer lending products offered through the fintech relationships do incidentally include consumer loans to borrowers located in the Salt Lake City AA. Based on information provided by the bank, the bank had \$1.8 million in outstanding consumer loans in the State of Utah as of June 30, 2024.

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA.

Home Mortgage Loans

The bank did not originate or purchase any home mortgage loans in this AA to perform a meaningful analysis. Refer to Table 7 in the state of Utah 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.

Small Loans to Businesses

The bank did not originate or purchase a sufficient number of small loans to businesses in this AA to perform a meaningful analysis. Refer to Table 9 in the state of Utah 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.

Small Loans to Farms

The bank did not originate or purchase a sufficient number of small loans to farms in this AA to perform a meaningful analysis. Refer to Table 11 in the state of Utah 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.

Lending Gap Analysis

The bank did not originate or purchase a sufficient number of home mortgage loans, small business loans, or small farm loans in this AA to perform a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor 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

The bank did not originate or purchase a sufficient number of home mortgage loans in this AA to perform a meaningful analysis. Refer to Table 8 in the state of Utah 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.

Small Loans to Businesses

The bank did not originate or purchase a sufficient number of small loans to businesses in this AA to perform a meaningful analysis. Refer to Table 10 in the state of Utah 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.

Small Loans to Farms

The bank did not originate or purchase a sufficient number of small loans to farms in this AA to perform a meaningful analysis. Refer to Table 12 in the state of Utah 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.

Community Development Lending

The institution had no CD loans.

Refer to Table 3 in the Lending Activity section for 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.

INVESTMENT TEST

The bank's performance under the Investment Test in Utah is rated Substantial Noncompliance.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City MSA was very poor.

The institution had no qualified investments, including grants, particularly those that are not routinely provided by private investors.

The institution exhibited very poor responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Salt Lake City MSA	0	0	0	0	0	0	0	0	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

There were no qualified investments or donations to evaluate. The bank did not make any qualified investments or donations in the state of Utah during the period reviewed.

SERVICE TEST

The bank's performance under the Service Test in Utah is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City MSA was poor.

Retail Banking Services

Service delivery systems reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Table 5: Distribution of Branch Delivery Systems

Assessment Area	Deposits		Branches						Population				2024
	% 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
				0.00	0.00	100.00	0.00	0.00	0.00	73.08	23.64	3.28	0.00
Salt Lake City MSA	100.00	1	100.00	0.00	0.00	100.00	0.00	0.00	0.00	73.08	23.64	3.28	0.00

Source: FFIEC File - 2020 Census

1/1/2022 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.00%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution has no record of opening or closing branches in the state.

The branch was located in close proximity to moderate-income geographies. Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

The bank offers free mobile banking and free bill-pay products. Mobile check deposit is free for consumers. Remote deposit capture is available for qualifying business customers. Customers can also access their accounts from outside of the bank's AAs through the Allpoint ATM network, consisting of over 55,000 ATMs. Management opted not to provide data or analysis to determine the alternative delivery systems impact on the availability and effectiveness in delivering retail banking services to LMI individuals or geographies.

Community Development Services

The institution did not report any CD services activity in the Salt Lake City MSA or state of Utah.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Enid MSA	Full-scope	Garfield County
Oklahoma (OK) Non-MSA	Full-scope	Counties of Kay*, Washington, and Woodward
Oklahoma City MSA	Full-scope	Counties of Canadian*, Cleveland*, and Oklahoma*
Tulsa MSA	Limited-scope	Tulsa County*
State of Utah		
Salt Lake City MSA	Full-scope	Salt Lake County*

*Partial County

Appendix B: Summary of MMSA and State Ratings

RATINGS Stride Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Stride Bank, NA	High Satisfactory	Needs to Improve	Needs to Improve	Satisfactory
State:				
Oklahoma	High Satisfactory	Needs to Improve	Needs to Improve	Satisfactory
Utah	Needs to Improve	Substantial Non-compliance	Needs to Improve	Needs to Improve

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

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/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 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 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 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

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/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

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

Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - 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 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - 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 AA.

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

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

State of Oklahoma

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
Enid MSA	76	11,765	3.87	2,515	3.22	1.32	1.67	7.68	5.26	4.85	54.33	61.84	53.64	34.77	31.58	39.84	--	--	--
Oklahoma Non-MSA	90	13,845	4.58	3,723	--	--	--	8.05	6.67	7.47	55.98	47.78	58.96	35.97	45.56	33.58	--	--	--
Oklahoma City MSA	1,602	407,373	81.57	57,697	4.56	3.00	3.82	20.45	14.11	18.41	35.97	33.58	35.64	37.84	48.38	41.22	1.18	0.94	0.91
Tulsa MSA	196	55,674	9.98	20,727	2.13	1.53	0.82	19.00	20.92	18.96	26.62	28.57	27.68	52.14	48.98	52.46	0.11	--	0.08
Total	1,964	488,657	100.00	84,662	3.61	2.65	2.85	18.79	14.10	17.66	35.59	34.83	35.25	41.21	47.66	43.60	0.79	0.76	0.64

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 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
Enid MSA	76	11,765	3.87	2,515	21.99	6.58	12.56	14.96	22.37	19.88	21.27	17.11	21.55	41.78	30.26	22.19	--	23.68	23.82
Oklahoma Non-MSA	90	13,845	4.58	3,723	17.49	8.89	6.15	15.74	18.89	14.05	18.62	22.22	18.43	48.15	43.33	35.27	--	6.67	26.11
Oklahoma City MSA	1,602	407,373	81.57	57,697	22.03	7.30	7.04	17.99	21.60	16.65	20.31	27.97	18.16	39.68	37.52	30.45	--	5.62	27.71
Tulsa MSA	196	55,674	9.98	20,727	19.44	2.04	5.87	16.12	14.29	16.03	18.39	22.45	18.95	46.05	41.33	35.69	--	19.90	23.47
Total	1,964	488,657	100.00	84,662	21.11	6.82	6.87	17.27	20.77	16.48	19.76	26.73	18.46	41.86	37.88	31.70	--	7.79	26.48

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

Due to rounding, totals may not equal 100.0%

Assessment Area:	2022 - 2024																		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Enid MSA	209	28,069	29.11	1,829	0.76	0.48	0.98	6.39	10.53	6.45	62.75	48.80	58.56	30.10	40.19	34.01	--	--	--
Oklahoma Non-MSA	256	19,606	35.65	4,371	--	--	--	15.69	9.77	12.13	46.99	38.67	54.08	37.32	51.56	33.79	--	--	--
Oklahoma City MSA	97	35,800	13.51	55,588	5.67	13.40	4.27	23.85	18.56	20.01	32.25	20.62	31.04	35.31	47.42	42.87	2.91	--	1.81
Tulsa MSA	156	40,129	21.73	30,729	3.71	2.56	4.04	21.57	12.18	23.70	29.53	17.31	27.21	44.95	67.95	44.94	0.25	--	0.12
Total	718	123,604	100.00	92,517	4.73	2.51	3.93	22.40	11.70	20.60	32.74	34.54	31.40	38.21	51.25	42.95	1.91	--	1.13

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:	2022 - 2024															
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available					
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Enid MSA	209	28,069	29.11	1,829	74.68	55.02	58.61	11.55	12.92	13.77	32.06					
Oklahoma Non-MSA	256	19,606	35.65	4,371	76.80	44.14	59.21	10.52	7.81	12.68	48.05					
Oklahoma City MSA	97	35,800	13.51	55,588	82.51	25.77	53.81	7.95	55.67	9.54	18.56					
Tulsa MSA	156	40,129	21.73	30,729	80.90	46.15	52.07	9.96	44.23	9.14	9.62					
Total	718	123,604	100.00	92,517	81.60	45.26	53.58	8.75	23.68	9.64	31.06					

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:	2022 - 2024																		
	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Enid MSA	102	12,560	24.17	233	--	--	--	3.01	--	--	52.41	54.90	63.52	44.58	45.10	36.48	--	--	--
Oklahoma Non-MSA	312	26,105	73.93	1,082	--	--	--	10.16	6.41	9.52	57.72	23.72	65.06	32.11	69.87	25.42	--	--	--
Oklahoma City MSA	7	594	1.66	826	5.24	--	0.61	23.62	--	15.38	30.82	--	25.67	38.94	100.00	57.75	1.38	--	0.61
Tulsa MSA	1	98	0.24	225	3.17	--	--	22.21	--	16.44	33.23	--	28.44	41.24	100.00	55.11	0.15	--	--
Total	422	39,357	100.00	2,366	3.99	--	0.21	20.89	4.74	11.28	35.02	30.80	47.68	39.22	64.45	40.62	0.89	--	0.21

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:	2022 - 2024																		
	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM			Farms with Revenues Not Available								
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate			
Enid MSA	102	12,560	24.17	233	93.37	92.16	61.80	6.63	2.94	--									4.90
Oklahoma Non-MSA	312	26,105	73.93	1,082	91.87	69.55	75.97	6.91	0.32	1.22									30.13
Oklahoma City MSA	7	594	1.66	826	94.12	71.43	75.30	4.78	--	1.09									28.57
Tulsa MSA	1	98	0.24	225	91.24	100.00	69.33	6.19	--	2.57									--
Total	422	39,357	100.00	2,366	93.20	75.12	73.71	5.41	0.95	1.39									23.93

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%

State of Utah

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
	Salt Lake City MSA	00	0.00	2,702	--	--	--	78.07	--	76.68	19.98	--	20.65	1.95	--	2.66	--	--	
Total	00	0.00	2,702	--	--	--	--	78.07	--	76.68	19.98	--	20.65	1.95	--	2.66	--	--	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 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
	Salt Lake City MSA	00	0.00	2,702	33.14	--	13.14	26.39	--	25.94	21.09	--	25.50	19.37	--	22.95	--	--	
Total	00	0.00	2,702	33.14	--	13.14	26.39	--	25.94	21.09	--	25.50	19.37	--	22.95	--	--		

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

Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022 - 2024

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
	Salt Lake City MSA	00	0.00	3,579	--	--	--	30.64	--	35.43	63.86	--	55.60	5.50	--	8.97	--	--	
Total	00	0.00	3,579	--	--	--	--	30.64	--	35.43	63.86	--	55.60	5.50	--	8.97	--	--	

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%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022 - 2024

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	% Aggregate	% Businesses	% Bank Loans
Salt Lake City MSA	00	0.00	3,579	77.88	--	40.04	9.48	--	12.64	--	12.64	--
Total	00	0.00	3,579	77.88	--	40.04	9.48	--	12.64	--	12.64	--

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:	2022 - 2024																	
	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
Salt Lake City MSA	00	0.00	5	--	--	--	49.47	--	60.00	47.37	--	40.00	3.16	--	--	--	--	--
Total	00	0.00	5	--	--	--	49.47	--	60.00	47.37	--	40.00	3.16	--	--	--	--	--

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:	2022 - 2024														
	Total Loans to Farms			Farms with Revenues <= 1MM			Farms with Revenues > 1MM			Farms with Revenues Not Available					
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Salt Lake City MSA	00	0.00	5	--	93.68	--	40.00	3.16	--	3.16	--	3.16	--	3.16	--
Total	00	0.00	5	--	93.68	--	40.00	3.16	--	3.16	--	3.16	--	3.16	--

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%