



PUBLIC DISCLOSURE

March 26, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Great Plains National Bank
Charter Number 23049

2017 West Third
Elk City, OK 73644

Office of the Comptroller of the Currency

Oklahoma City Field Office
The Harvey Parkway Building
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116-7908

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: This Institution is rated Satisfactory.

The Lending Test is Rated: Satisfactory

The Community Development Test is Rated: Satisfactory

The major factors that support this rating include:

- A majority of Great Plains National Bank's (GPNBs) loans were originated within their assessment areas (AAs).
- The loan-to-deposit (LTD) ratio is excellent and exceeds the standard for satisfactory performance.
- The bank's distribution of loans to businesses and individuals of different income levels is satisfactory.
- The geographic distribution of loans reflects an adequate dispersion throughout the AAs in light of the bank's performance context.
- GPNB's community development (CD) performance demonstrates adequate responsiveness to the CD needs of its AAs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing's, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Low-Income: Individual income that is 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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

GPNB is a \$629 million community banking institution headquartered in Elk City, Oklahoma, which is located in western Oklahoma. At December 31, 2017, GPNB's loan portfolio totaled \$564 million, composing 90 percent of total assets. GPNB is a subsidiary of a one-bank holding company, Great Plains Bancshares, Inc. The bank operates 16 banking centers in 14 Oklahoma communities. The main office and two branches are located in Elk City, Oklahoma, with branches located in Hollis, Sayre, Mangum, Granite, Burns Flat, Cordell, Hobart, Woodward, Taloga, Tuttle, Oklahoma City and Piedmont. In May of 2017, GPNB opened a branch in Oklahoma City (Midtown branch). All branches except the Midtown branch in Oklahoma City and the Wal-Mart branch in Elk City offer drive-through banking. GPNB has 15 proprietary ATMs located primarily at their banking centers.

GPNB's primary focus is to serve the commercial, agriculture, and consumer customers in the above communities and their surrounding areas in Central, Western and Southwestern Oklahoma. The bank meets these needs by providing various loan and deposit products, as well as other financial services. Hours of operation are responsive to the general banking needs of the areas served.

As of December 31, 2017, GPNB's total assets were \$629 million, of which \$564 million, or 90 percent, were comprised of various types of loans to individuals and commercial businesses. The bank's loan portfolio is segmented as follows:

Loan Portfolio Composition as of December 31, 2017		
	\$ (000)	%
Business Loans	\$221,735	39.32%
1-4 Family Residential RE Loans	\$175,403	31.10%
Agriculture Loans	\$133,366	23.65%
Consumer Loans	\$29,578	5.24%
Other Loans	\$3,861	0.69%
Total	\$563,943	100.00%

Source: December 31, 2017 Report of Condition and Income.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. GPNB is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "**Satisfactory**" at the last CRA evaluation dated May 6, 2014.

Scope of the Evaluation

A Data Integrity review commenced on September 11, 2017, to evaluate the bank's system of internal controls for collecting, verifying, and submitting data reported on the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR). Two AAs were designated for full-scope reviews. There were no areas designated as limited scope AAs. Full-scope reviews were performed for Oklahoma City Partial MSA and GPNB Non-MSA. The Data Integrity review determined that the bank's control systems for collecting, verifying and submitting the HMDA LAR were satisfactory and the bank's HMDA LAR was accurate.

Full-scope reviews were conducted in AAs where the bank has a substantial share of its deposit and loan business. The Non-MSA AA contains 57 percent of the bank's loans and 87 percent of the bank's deposits. More emphasis was placed on performance in the Non-MSA AA since it contains a majority of the bank's loans and deposits. The full-scope review of the Oklahoma City Partial MSA AA included a random sample of small business loans originated in 2014 through 2017 and HMDA loans (home purchase, home refinance, and home improvement) originated in 2016 and 2017.

The full-scope review of GPNB Non-MSA AA included a random sample of small business and HMDA loans for the same time periods, respectively. These are the major loan products for the bank.

This Performance Evaluation is based on 2010 US Census demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage and small business loans from January 1, 2014 through December 31, 2017. Conclusions regarding the Community Development Test are based on CD activities from May 6, 2014 through March 26, 2018.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

The Lending Test is Rated: Satisfactory

This Performance Evaluation assesses GPNB's performance focusing primarily on five performance criteria: LTD ratio; lending in the AAs; lending to borrowers of different incomes and to businesses of different sizes; geographic distribution of loans; and responses to CRA related complaints.

To evaluate GPNB's lending performance, a random sample of 62 HMDA loans originated in 2016 and 2017 were reviewed. In addition, a random sample of 65 small business loans originated in 2014 through 2017 were also evaluated. Small business and residential real estate loans serve as GPNB's primary loan products. Slightly more emphasis was placed on performance in the Non-MSA AA since it contains a larger portion of the bank's loans and deposits. Slightly more weight was also given to small business lending performance than home mortgage lending since small business lending is the bank's largest loan product.

Based on this analysis and consistent with available resources and capabilities, GPNB is meeting the credit needs of the AAs in a satisfactory manner. The bank's LTD ratio exceeds the standard for satisfactory performance. The distribution of loans to businesses and mortgage loans to individuals of different income levels reflects a reasonable penetration and is satisfactory. The geographic distribution of loans reflects a reasonable dispersion of loans to low- to moderate-income (LMI) geographies and reflects adequate performance.

Loan-to-Deposit Ratio

GPNB's LTD ratio is excellent and exceeds the standard for satisfactory performance. The bank's LTD ratio at December 31, 2017 was 110 percent. The bank's average quarterly LTD ratio from June 30, 2014 through December 31, 2017 was 104 percent. This average was compared to the average of six similar banks located in GPNB's AA or the surrounding counties, with total assets between \$250 million and \$650 million, for the same time period. GPNB's average LTD ratio of 104 percent is higher than the average of the six comparable banks of 81 percent. These average LTD ratios are detailed in the following:

Institution	Assets as of 12/31/2017 \$ (000)	Average LTD Ratio
Great Plains National Bank	629,025	103.83%
Quail Creek Bank, NA	632,147	86.54%
Vision Bank, NA	658,185	82.85%
Central National Bank & Trust of Enid	629,684	85.76%
First National Bank & Trust of Chickasha	581,151	71.48%
Bank of Western Oklahoma	262,308	90.43%
First National Bank & Trust of Elk City	314,459	67.62%

Source: Institution Reports of Condition from June 30, 2014 to December 31, 2017.

Lending in Assessment Area

GPNB's lending in its AAs meets the standard for satisfactory performance. A majority of the number and dollar amount of home mortgage and small business loans were originated inside the bank's AAs. As depicted in the following table, 77.17 percent of the number and 77.88 percent of the dollar amount of loans originated in GPNB's AAs.

Lending in Assessment Areas										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	49	79.03	13	20.97	62	5,716,000	82.78	1,189,000	17.22	6,905,000
Small Business	49	75.38	16	24.62	65	2,410,917	68.30	1,119,011	31.70	3,529,928
Totals	98	77.17	29	22.83	127	8,126,917	77.88	2,308,011	22.12	10,434,928

Source: Random sample for 2016 and 2017 HMDA and random sample of small business loans originated in 2014 through 2017.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

GPNB's Non-MSA AA

GPNB's borrower distribution of business and home mortgage loans is reasonable and meets the standard for satisfactory performance. GPNB is primarily a small business lender and therefore more emphasis was placed on the bank's small business lending.

GPNB's overall distribution of home mortgage loans to LMI families is reasonable considering its performance context. LMI families have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. In GPNB's Non-MSA AA, a low-income person earns less than \$26,400 annually, while the average median housing cost in the bank's AA is \$93,167. Consequently, many LMI families are unable to purchase homes. According to the 2010 US Census data, approximately 49 percent of households in the AA are on fixed income from social security or retirement; and 24 percent of the housing units in the AA are rental property. Seventeen (17) percent of the population in the bank's AA are below the poverty level or on public assistance.

The borrower distribution of home mortgage loans to both low- and moderate-income families is somewhat lower than the percentage of families in each category and reflects adequate penetration when giving consideration to the bank's performance context.

Borrower Distribution of Residential Real Estate Loans in GPNB's Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Mortgage	19.45	12.50	14.97	8.33	17.21	20.83	48.38	58.34

Source: Random sample of 2016 and 2017 loans reported under HMDA; U.S. Census data.

GPNB's distribution of loans to small businesses is excellent. Loans to businesses with revenues of \$1.0 million or less represented 84.62 percent of the sampled loans. This ratio exceeds the 77.16 percent of area businesses that reported revenues of less than \$1.0 million. Note that 16.81 percent of the businesses in the AA did not report income data.

Borrower Distribution of Loans to Businesses in GPNB's Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	77.16	6.03	16.81	100%
% of Bank Loans in AA by #	84.62	15.38	0.00	100%
% of Bank Loans in AA by \$	49.16	50.84	0.00	100%

Source: Random sample of small business for 2014 through 2017; Dun and Bradstreet data.

Geographic Distribution of Loans

Because the bank does not have any low-income census tracts and only one moderate-income census tract in this AA, an analysis of the geographic distribution of loans would not be meaningful and was not performed.

GPNB's Oklahoma City Partial MSA AA

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

GPNB's borrower distribution of business and home mortgage loans is reasonable and meets the standard for satisfactory performance. GPNB is primarily a small business lender and therefore more emphasis was placed on the bank's small business lending.

GPNB's overall distribution of home mortgage loans to LMI families is reasonable in given its performance context. LMI families have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. In GPNB's Oklahoma City Partial MSA AA, a low-income person earns less than \$33,300 annually, while the

average median housing cost in the bank's AA is \$134,809. Consequently, many LMI families are unable to purchase a home. According to the 2010 US Census data, approximately 45 percent of households in the AA are on fixed income from social security or retirement; and 24 percent of the housing units in the AA are rental property. Fifteen (15) percent of the population in the bank's AA are below the poverty level or on public assistance.

The borrower distribution of home mortgage loans to both low- and moderate-income families is somewhat lower than the percentage of families in each category and reflects adequate penetration in light of the bank's performance context.

Borrower Distribution of Residential Real Estate Loans in GPNB's Oklahoma City Partial MSA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans						
Home Mortgage	22.68	12.50	17.76	8.33	20.03	20.83	39.54	58.34

Source: Random sample of 2016 and 2017 HMDA loans; U.S. Census data.

GPNB's distribution of loans to small businesses is excellent. Loans to businesses with revenues of \$1.0 million or less represented 95.65 percent of the sampled loans. This ratio exceeds the 83.54 percent of area businesses that reported revenues of less than \$1.0 million. Note that 10.38 percent of the businesses in the AA did not report income data.

Borrower Distribution of Loans to Businesses in GPNB's Oklahoma City Partial MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	83.54	6.08	10.38	100%
% of Bank Loans in AA by #	95.65	4.35	0.00	100%
% of Bank Loans in AA by \$	68.91	31.09	0.00	100%

Source: Random sample of small business loans for 2014 through 2017; Dun and Bradstreet data.

Geographic Distribution of Loans

GPNB's overall geographic distribution of home mortgage loans and small business loans reflects a reasonable dispersion among LMI geographies when considering the bank's performance context. GPNB opened its first branch in the Oklahoma City Partial MSA in Tuttle, Oklahoma in December 2011, designating Grady County as their AA. For 2016, Grady County had no low-income census tracts and 4 moderate-income census tracts out of 10 total tracts. The moderate-income tracts comprise downtown Chickasha and an

area just north of downtown that is largely industrial, sparsely populated with few homes, low owner occupancy and is a flood zone. In January 2013, GPNB opened a branch in Piedmont Oklahoma, adding Canadian County to their AA, which has only 1 low-income census tract and 2 moderate-income census tracts out of 29 total tracts. Opportunities to lend to LMI areas by these branches has been limited due to the low number of LMI tracts. In May of 2017, GPNB opened a branch in downtown Oklahoma City, adding Oklahoma County to their AA. This branch has been opened less than one year and the bank is currently expanding their lending footprint in the county.

GPNB’s geographic distribution of home mortgage loans in low-income tracts is poor and the distribution to moderate-income tracts is adequate for an overall reasonable dispersion considering the bank’s performance context. Also, opportunities to extend home mortgage loans in low-income tracts is very limited, given owner occupancy is only 4.37 percent in those tracts.

Geographic Distribution of Residential Real Estate Loans in GPNB’s Oklahoma City Partial MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans						
Home Mortgage	4.87	0.00	21.72	12.50	39.44	50.00	33.87	37.50

Source: Random sample of 2016 and 2017 HMDA loans, U.S. Census data.

GPNB’s geographic dispersion of small business loans in LMI tracts is poor but performance is mitigated by the performance context issues noted above.

Geographic Distribution of Loans to Businesses in GPNB’s Oklahoma City Partial MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans						
Small Business	5.94	0.00	24.12	4.35	34.81	65.22	31.36	30.43

Source: Random sample of small business loans for 2014 through 2017; Dun and Bradstreet data.

Responses to Complaints

There have been no consumer complaints regarding GPNB's Community Reinvestment Act during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated "Satisfactory." GPNB's CD performance demonstrates adequate responsiveness to the CD needs of its AAs. A majority of the Oklahoma City Partial MSA AA is comprised of metropolitan, high-density areas that include Oklahoma City, Edmond, and Midwest City. A majority of the Non-MSA AA is comprised of rural, poor, low-density areas in western Oklahoma.

GPNB is active in the communities they serve. This is evidenced by their leadership roles in various civic and non-profit organizations that provide services to LMI individuals. The bank is also involved with, invests in, or lends to individuals or organizations whose focus is on affordable housing, community services, or economic development.

Number and Amount of Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulation. GPNB level of CD loans indicates excellent responsiveness to the needs of the bank's AAs.

Oklahoma City Partial MSA AA

The level of qualified CD loans in the Oklahoma County Partial MSA AA reflects excellent responsiveness. The bank has originated or renewed 23 CD loans totaling \$21.4 million during the evaluation period.

GPNB originated or renewed 16 loans to 7 different borrowers totaling approximately \$13.9 million that provided funding for economic development through creating and retaining permanent LMI jobs in the bank's AA. The 7 borrowers created or maintained 88 LMI permanent jobs.

Examples of some of the CD loans originated by the bank during the evaluation period include one loan totaling \$7.4 million to construct a Radisson hotel, which will create approximately 18 LMI jobs. The excess land will also be sold for construction of restaurants and shopping centers, resulting in additional jobs. Two loans to one borrower totaling \$2.5 million were used for operating expenses and resulted in retaining 16 LMI jobs. An additional loan to a business to refinance debt for \$1.1 million helped to retain 18 LMI jobs.

Five loans to one borrower totaling \$6.9 million were extended to purchase, refinance, or rehabilitate affordable housing in the AA. All of the units in the multi-family complexes financed by the bank rent for rates that are below the median market rents in the area, thus providing housing for LMI individuals.

GPNB originated one community service loan totaling \$75.3 thousand to renovate two halfway houses and add additional capacity. The borrower operates a non-profit organization that exists to break the cycles of incarceration and poverty in Oklahoma. The organization provides educational preparation, social services, and job training and placement primarily for LMI individuals.

Non-MSA AA

The level of qualified CD loans in the Non-MSA AA reflects excellent responsiveness. The bank has originated or renewed 65 CD loans totaling \$20.4 million that provided funding for economic development through creating and retaining 180 permanent LMI jobs in the bank's AA. Following are details on some of the CD loans originated by the bank during the evaluation period.

GPNB originated or renewed 53 loans to 21 different borrowers totaling approximately \$17.8 million that provided funding for economic development through creating and retaining permanent LMI jobs in the bank's AA. The seven borrowers created or maintained 180 LMI jobs.

Examples of some of the CD loans originated by the bank during the evaluation period include two loans to one borrower totaling \$4.2 million to construct a Best Western Plus/Executive Residence Extended Stay hotel. After construction is completed this will create approximately 25 LMI jobs. This is one of the first dual branded hotels for Best Western, featuring 16 regular rooms and the remaining 50 rooms as extended stay. Two loans to one borrower totaling \$807 thousand were used to purchase a restaurant and resulted in creating 20 LMI jobs. Seven loans to one borrower totaling \$6.3 million were used for operating expenses and equipment purchases and resulted in retaining 13 LMI jobs.

Two loans to two borrowers totaling \$301 thousand were extended to revitalize and stabilize in the AA. One of the loans for \$49.3 thousand was in a distressed and underserved middle-income tract and funds were used to upgrade electrical wiring, convert the apartment from natural gas to electric, and install new water heaters. The other loan totaling \$251.3 thousand is located in a disaster area and proceeds were used to rebuild a commercial property damaged in a natural disaster.

GPNB originated ten community service loans totaling \$2.4 million. One loans, totaling \$850 thousand, was originated in a distressed and underserved middle-income tract where the borrower operates the local rural hospital that assists LMI individuals with their health care needs. One loan totaling \$750 thousand, was used to purchase two pharmacies both located in distressed and underserved middle-income tract providing the

rural communities with continued vital healthcare services. Two loans to one borrower totaling \$193 thousand, provided working capital for a drug rehabilitation center. The business provides drug treatment and therapy for patients recovering from addiction. They assist with finding sober living to ensure success upon completion of the program.

Number and Amount of Qualified Investments

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulations. GPNB's level of CD investments reflects good responsiveness to the needs of the bank's AAs.

Oklahoma City Partial MSA AA

The level of qualified CD investments in the Oklahoma City Partial MSA AA reflects adequate responsiveness.

GPNB has donated \$3.4 thousand to 7 qualified organizations in the Oklahoma City Partial MSA AA during the review period. Donations have been made to local non-profit organizations that provide social services, youth programs, job skills and housing needs that target LMI individuals. Donations have also been made to organizations that provide business advocacy and economic development support for local businesses and activities in the AA.

Non-MSA AA

The level of qualified CD investments in the Non-MSA AA reflects excellent responsiveness.

During the evaluation period, GPNB invested in one CD qualified municipal security, totaling \$403 thousand, which will finance the construction, furnishing, and equipping of a safe room in the Pre-K Building in Merritt Public Schools. Merritt Public Schools is located in western Oklahoma, an area prone to tornadic activity. This community is rural and underserved and more than 50 percent of the student population qualifies for the federal free or reduced-price lunch program.

GPNB has also donated \$279 thousand to 367 qualified organizations in the Non-MSA AA during the review period. Donations have been made to local non-profit organizations that provide social services, youth programs, job skills and housing that target LMI individuals. Donations have also been made to organizations that provide business advocacy and economic development support for local businesses and activities in the AA.

Extent to Which the Bank Provides Community Development Services

Overall, GPNB's CD service activity reflects adequate responsiveness in the AAs.

Oklahoma City Partial MSA AA

The level of qualified CD services reflects adequate responsiveness to the needs of the bank's AA. Four bank officers serve in leadership positions in three organizations that are involved in economic or small business development activities or in organizations that provide community services to LMI families. They provide technical and financial assistance to these organizations. The following are examples of qualifying CD services.

Piedmont Chamber of Commerce

Branch President Jay Winkle is a board member and served as the Treasurer for one year and in that role provided financial expertise. The chamber is heavily involved in the community and promotes economic development by helping small businesses and in recruiting larger businesses that employ LMI individuals.

United Way of Canadian County

A bank officer serves as a board member of United Way. As a board member he provides financial expertise to the Board when discussing new partner agencies and potential new programs. The United Way of Canadian County works to help improve the health, safety, education and economic well-being of at-risk individuals and families in the Canadian County area. The United Way of Canadian County funds 20 programs and partners with 15 agencies. The services provided by and the funding help support numerous partner agencies that primarily benefit LMI persons.

Greater Oklahoma City Chamber of Commerce

Two bank officers serve as Advisory members of the Board for the Greater Oklahoma City Chamber of Commerce. The Chamber's primary goals are to support their members and the business community through economic and community development, government relations, education and workforce development initiatives, and tourism growth. In recent years, the Economic Development Division has brought hundreds of jobs to the area by recruiting companies, such as Boeing, AAA, Continental Resources, and Paycom.

Non-MSA AA

The level of qualified CD services reflects adequate responsiveness to the needs of the bank's AA. Six bank officers serve in leadership positions in eight organizations that provide either community services to LMI families or are involved in economic and small business development activities. They provide technical and financial assistance to these organizations. The following are examples of qualifying CD services.

Freedom West Community Development Corporation (CDC)

A bank officer serves as a board member of this corporation providing lending oversight when discussing the viability of new projects. Freedom West CDC, is a 501 (c) (3) non-profit development entity serving Alfalfa, Dewey, Harper, Woods, and Woodward counties in Northwest Oklahoma. Their mission is to revitalize the rural communities in its service region and to increase community sustainability through pro-active social and economic change efforts. One of the ways they accomplish this is by assisting low-income households with needed housing improvements. Additionally, they maintain an active portfolio of affordable rental units in Alva, Cherokee, Waynoka, Freedom and Mooreland.

Elk City Rotary Club

Two bank officers are members of this association. One of the primary functions of the organization is to support the Meals on Wheels Program. This program provides meal delivery service to the elderly and disabled. They also provide dictionaries to all 3rd graders in the area and support and run local pageants.

Community Action Development Corporation (CADC)

A Branch President serves as a board member of this corporation, utilizing his financial expertise in discussing new and upcoming projects. CADC offers a multitude of services to assist LMI individuals within their region. They provide emergency assistance for the payment of utility bills, food, and shelter, income tax filing assistance (for filers under \$50 thousand), prescription programs, Affordable Care Act assistance for health care, child care, head start programs, housing weatherization services to conserve energy, congregate and meal delivery services, transportation, and affordable housing.

Elk City Chamber of Commerce

There are two bank employees who participate and sit on committees. Branch President Lindy McConnell is a member of the Ambassador Committee and is the Co-Chairperson of the Western Oklahoma Education Exposition and Purcy Walker serves as the Chairman of the Political Issues Committee. They both provide financial expertise to the committees they serve on and for the Chamber overall. The chamber is heavily involved in the community and promotes economic development by helping small businesses and in recruiting larger businesses that employ LMI. Over the last year, the chamber has successfully recruited both Hobby Lobby and Wendy's to Elk City. There is a new chicken chain restaurant set to open soon and they hope to be adding a Starbuck's to the lineup as well.

Responsiveness to Community Development Needs

Overall, GPNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout their AAs. The level of CD activities is excellent with \$42 million in CD loans and \$686 thousand in qualified investments and donations. Bank officers have taken leadership roles in the community with their involvement in organizations that provide community services to LMI persons and promote economic development.

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 metropolitan and nonmetropolitan areas 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	Lending Test (excludes CD loans): (01/01/14 to 12/31/17) Investment and Service Tests and CD Loans: (05/07/14 to 03/26/17)	
Financial Institution	Products Reviewed	
Great Plains National Bank (GPNB) Elk City, OK	Small Business Loans Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Oklahoma City Partial MSA GPNB Non-MSA	Full-Scope Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

GPNB Non-MSA AA

Demographic Information for Full-Scope Area: GPNB Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0.00	4.17	66.67	29.16	0.00
Population by Geography	84,662	0.00	3.39%	57.07	39.54	0.00
Owner-Occupied Housing by Geography	21,280	0.00	3.82	58.43	37.75	0.00
Businesses by Geography	5,551	0.00	3.12	56.21	40.68	0.00
Farms by Geography	599	0.00	9.02	62.60	28.38	0.00
Family Distribution by Income Level	20,874	19.44	14.97	17.21	48.38	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2016	= \$51,698					
Households Below the Poverty Level	= \$52,800 = 14.17					
			Median Housing Value			= \$93,167
			Unemployment Rate			= 2.31%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The AAs adopted by GPNB consists of whole geographies; do not reflect illegal discrimination; and, do not arbitrarily exclude low- or moderate-income geographies. The AAs meet the requirements of the CRA regulation. The GPNB Non-MSA AA includes 9 counties in western Oklahoma to include the main bank location in Elk City.

GPNB has defined their Non-MSA AA as Dewey, Woodward, Kiowa, Roger Mills, Washita, Greer, Beckham and Harmon counties in their entirety and one census tract in Jackson County for a total of 24 census tracts. Of these, there are no low-income census tracts, one is a moderate-income census tract, 16 are middle-income census tracts and seven are upper-income census tracts. Population of the area totals 84,662. There are 38,987 total housing units, of which 21,280 or 54.58 percent are owner occupied. Households below the poverty level total 4,356 or 14.17 percent and households that receive public assistance total 782 or 2.54 percent of the total number of households.

The economy in western Oklahoma is primarily driven by oil and gas production and the agriculture industry. The economy has been negatively impacted by low energy and agriculture commodity prices. Energy prices, while low, have stabilized in the last year allowing for an economic recovery. Local banking competition within the AA is aggressive

and includes several community, regional, and national banks and branches of these financial institutions. Major employees include Great Plains Regional Hospital in Elk City and Sayre Memorial Hospital in Sayre, Elk City Public Schools, Wal-Mart, Bar S Foods, and the City of Elk City.

Appendix B: Community Profiles for Full-Scope Areas

Oklahoma City Partial MSA AA

Demographic Information for Full-Scope Area: (Name of Multistate Metropolitan Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	280	10.36	32.14	34.29	20.36	2.86
Population by Geography	934,285	8.70	27.85	36.16	26.98	0.31
Owner-Occupied Housing by Geography	219,002	4.87	21.72	39.44	33.87	0.09
Businesses by Geography	68,738	5.94	24.12	34.81	31.36	3.27
Farms by Geography	1,859	3.55	15.98	45.29	34.43	0.75
Family Distribution by Income Level	227,594	22.68	17.76	20.03	39.54	0.00
Median Family Income HUD Adjusted Median Family Income for r2016 Households Below the Poverty Level	= \$64,058 = \$66,600 = 14.97%	Median Housing Value Unemployment Rate		= \$134,809 = 3.71%		

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census, and 2016 HUD updated MFI.

GPNB has defined their Oklahoma City Partial MSA as Oklahoma, Canadian and Grady counties in their entirety consisting of 280 census tracts. Of these, 29 are low-income census tracts, 90 are moderate-income census tracts, 96 are middle-income census tracts, 57 are upper-income census tracts and eight are not applicable. Population of the area totals 934,285. There are 396,175 total housing units, of which 219,002 or 55.28 percent are owner occupied. Households below the poverty level total 53,000 or 14.97 percent and households that receive public assistance total 11,840 or 3.34 percent of the total number of households.

The economic conditions in the Oklahoma City MSA AA are stabilizing. The economic downturn in the energy sector over the past several years had a negative impact on local businesses and families in the AA. However, recent improvement in the energy sector has boosted the local economy and positively impacted families in the AA. Average unemployment for the area remains low. The Bureau of Labor Statistics reports an unemployment rate for Oklahoma County of 4.4 percent as of October 31, 2017. Major employers are oil and natural gas companies, as well as services, technology, hospitals, and universities. The Federal Government also employs a large number of workers at Tinker Air Force Base and The United States Department of Transportation.

Local banking competition in the Oklahoma City market is aggressive and includes several community, regional, and nation-wide banks and/or branches of these financial institutions.

In conducting the assessment of the bank's performance, community contacts made within the AA were reviewed. The contacts indicated that, In general, local financial institutions are involved in CD activities and meet the credit needs of the community. According to the contacts, the primary community development needs of Oklahoma City continue to be quality jobs, affordable housing, and transportation.