



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company of Ardmore
Charter Number 13677

405 W Main Street
Ardmore, OK 73401

Office of the Comptroller of the Currency
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

Institution's 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:

- The Lending Test rating is based on a reasonable loan-to-deposit (LTD) ratio, a majority of loans purchased or originated in the bank's assessment areas (AAs), a satisfactory distribution of loans in low- and moderate- (LMI) geographies, and a satisfactory distribution of loans to individuals and small businesses of different income levels.
- The Community Development (CD) Test rating is based on adequate responsiveness to CD needs in the AAs through CD loans, qualified investments, and CD services in the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable.

The quarterly average net LTD ratio for First National Bank and Trust of Ardmore (FNBT or bank) from January 2019 to December 2021 (the evaluation period) was 73.4 percent. FNBT's LTD ranged from a high of 78.8 percent in the second quarter of 2019 and a low of 67.0 percent in the fourth quarter of 2021. FNBT's average was in line with other similar-sized banks that share some or all of the same market area as FNBT. Similar-sized banks had an average LTD of 72.5 percent over the evaluation period with ratios ranging from an average low of 61.9 percent and a high average of 88.8 percent.

Bank	Asset Size	Average LTD
<i>First National Bank and Trust Company of Ardmore</i>	\$ 615,559	73.44
American Nation Bank, Ardmore, OK	\$ 581,869	66.73
The First National Bank and Trust Co., Chickasha, OK	\$ 908,364	67.54
First Bank & Trust Company, Duncan, OK	\$ 769,911	88.77
Vision Bank, National Association, Ada, OK	\$ 864,309	77.45
The Pauls Valley National Bank	\$ 317,781	61.87

FNBT's LTD ratio steadily declined over the evaluation period as the ratio was heavily impacted by the COVID-19 pandemic. In 2020 FNBT saw increases to loan balances from originated Small Business Association Payment Protection Program (PPP) loans and, later, an increase in deposit balances as depositors received federal pandemic-related stimulus funds and financial support. The federal government later forgave the PPP loans, but depositors did not spend the funds as fast as expected which reduced the LTD ratio.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 84.3 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.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	337	85.5	57	14.5	394	46,693	76.6	14,230	23.4	60,923
Small Business	1,696	84.04	322	16.0	2,018	178,950	81.1	41,625	18.9	220,575
Total	2,033	84.3	379	15.7	2,412	225,643	80.2	55,855	19.8	281,498

*All values sourced from bank internal data. Sampling used to verify accuracy.
Total values may not all equal 100.0% due to rounding*

Description of Institution

First National Bank and Trust Company of Ardmore is a community bank with \$616 million in total assets as of December 31, 2021. FNBT is headquartered in Ardmore, OK in the south-central part of the state. FNBT is a subsidiary of The First National Corporation of Ardmore, Inc., a one-bank holding company also headquartered in Ardmore, OK.

For this performance evaluation, FNBT's market area was separated into two AAs, the OKC Partial MSA AA and the Oklahoma Non-MSA AA. The OKC Partial MSA AA consists of the entirety of Cleveland County while the Oklahoma Non-MSA AA consists of the entirety of Carter, Jefferson, Love, Marshall, Murray, and Stephens counties. All branches and ATMs are within these two AAs.

The primary branch is located at 405 W Main Street with a separate motor bank and ATM located across the street. FNBT has 10 branch locations and 11 ATM locations all located within the state of Oklahoma and within its AAs. FNBT opened the newest branch in Madill in March of 2019 and is located in Marshall County, part of the Oklahoma Non-MSA AA. The tables below organize the bank's branch and ATM locations. All branches have a drive-in facility with the exception of the Norman Branch.

FNBT Ardmore Branch Locations		
Location	Address	City
Main Bank	405 W Main Street	Ardmore
Broadway Branch	1226 West Broadway	Ardmore
12th Street Branch & Mortgage Center	1402 12th Street Northwest	Ardmore
Lone Grove Branch	17055 US Hwy 70	Lone Grove
Marietta Branch	1101 Memorial Drive	Marietta
Ringling Branch	125 West Main Street	Ringling
Sulphur Branch	2013 West Broadway	Sulphur
Velma Branch	319 Main Street	Velma
Norman Branch	716 Wall Street	Norman
Madill Branch	401 S 1st Street	Madill

FNBT Ardmore ATM Locations		
Location	Address	City
Main Bank Drive-In Facility	115 D Street NW	Ardmore
Broadway Branch	1226 West Broadway	Ardmore
12th Street Branch	1402 12th Street Northwest	Ardmore
OK One Stop (ATM Only)	2500 West Broadway	Ardmore
Loan Grove Branch	17055 US Hwy 70	Lone Grove
Marietta Branch	1101 Memorial Drive	Marietta
Ringling Branch	125 West Main Street	Ringling
Sulphur Branch	2013 West Broadway	Sulphur
Speedy G's Store (ATM Only)	102 Purdue Street	Velma
Velma Branch	319 Main Street	Velma
Madill Branch	401 S 1st Street	Madill

FNBT's primary focus is to serve the financial needs of commercial and consumer customers in its AAs. The bank meets these needs by offering many different loan and deposit products and various types of banking services including internet banking, telephone banking, mobile banking, and asset management services. The bank also sells non-deposit investment products to retail customers through a third-party provider. Bank lobby and services are provided Monday through Friday at all branch locations. Saturday drive in service is available at all branches except the Norman and Velma locations.

As of December 31, 2021, FNBT's total assets equaled \$616 million. Of that, \$353 million, or 57 percent, equals total loans comprised of commercial real estate loans, commercial and industrial loans, residential real estate loans, construction and development loans, agricultural loans, individual loans, farmland loans, and other loan types. The following table illustrates the breakdown of loan types.

Loan Type	\$(000)'s	%
Commercial Real Estate	\$91,913	26.03%
Commercial and Industrial	\$67,100	19.00%
Residential Real Estate	\$55,987	15.85%
Other	\$46,854	13.26%
Construction and Development	\$31,346	8.88%
Agricultural	\$24,566	6.96%
Individual Loans	\$18,470	5.23%
Farmland	\$16,907	4.79%
Total Loan Portfolio	\$353,143	100.00%

There are no legal, financial, or other factors affecting FNBT's ability to meet the credit needs of the AAs. The last CRA evaluation dated April 29, 2019, concluded overall Satisfactory performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period includes all reported activity from January 1, 2019, to December 31, 2021. The evaluation considers small business loans, home mortgage (HMDA) loans, community development loans, qualified investments, and community development service activities during the evaluation period.

The OCC compared bank loan data for all applicable years in the state rating area to demographic data using the U.S. Census American Community Survey (ACS) and the Federal Financial Institutions Examination Council (FFIEC) adjusted median family income for each AA.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating 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 performance in each of FNBT’s AAs. The performance in the Oklahoma Non-MSA AA is weighted more than performance in the OKC Partial MSA AA because the majority of FNBT’s lending and deposit activity is in the Oklahoma Non-MSA AA with 99 percent of deposits and 82.5 percent of loan volume in this AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits satisfactory geographic distribution of loans in the AAs.
- The bank exhibits satisfactory distribution of loans to individuals and small businesses of different income levels in the AAs.
- The bank exhibits adequate responsiveness to community development needs in the AAs through community development loans, qualified investments, and community development services considering the bank's capacity, community needs, and the availability of opportunities for community development in the AAs.

Description of Institution's Operations in Oklahoma

FNBT operates 10 branches and 11 ATMs in the two AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending in addition to the traditional suite of loans and deposit products to meet the needs of their community. Primary loan products in both AAs were similar, so we chose the same products for analysis in both AAs.

OKC Partial MSA AA

The OKC Partial MSA AA consists of 62 contiguous census tracts (CTs) in Cleveland County. The 62 CTs in this AA are comprised of 11 moderate-income CTs, 27 middle-income CTs, 23 upper-income CTs, and one with an unknown income rating. This CT, code #2007.00, encompasses the Griffin Memorial Hospital and a collection of state and county owned buildings; no residential or commercial businesses are located in this CT. There are no low-income designated CTs in Cleveland County. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: OKC Partial MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	62	0.0	17.7	43.5	37.1	1.6
Population by Geography	268,614	0.0	13.6	48.4	37.9	0.1
Housing Units by Geography	108,874	0.0	15.7	48.7	35.6	0.0
Owner-Occupied Units by Geography	65,881	0.0	9.4	49.9	40.8	0.0
Occupied Rental Units by Geography	33,395	0.0	25.9	46.8	27.2	0.1
Vacant Units by Geography	9,598	0.0	24.2	46.8	29.0	0.0
Businesses by Geography	22,285	0.0	14.6	41.4	43.9	0.2
Farms by Geography	649	0.0	9.7	46.2	44.1	0.0
Family Distribution by Income Level	65,681	17.3	15.8	21.9	45.0	0.0
Household Distribution by Income Level	99,276	20.2	15.1	18.7	46.0	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$149,132
			Median Gross Rent			\$834
			Families Below Poverty Level			8.1%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition in the OKC Partial MSA AA is high with 26 other financial institutions ranging in size from large nationwide banks to small state banks. Based on the FDIC Deposit Market Share Data as of June 30, 2021, FNBT holds less than 1 percent of the market share of deposits and is ranked next to last in total deposits in the AA. The OKC Partial MSA AA accounts for 1 percent of FNBT's deposits and 1.6 percent of FNBT's number of loans.

Due to the high level of competition and small representation of deposits and loans in this AA, a community contact was not conducted.

Oklahoma Non-MSA AA

The Oklahoma Non-MSA AA consists of 35 CTs in Carter, Jefferson, Love, Marshall, Murray, and Stephens Counties. The 35 CTs in this AA are comprised of three moderate-income CTs, 24 middle-income CTs, and eight upper-income CTs. There are no low-income designated CTs in the AA. The AA meets the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

Table A – Demographic Information of the Assessment Area						
Assessment Area: OK Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	8.6	68.6	22.9	0.0
Population by Geography	138,991	0.0	7.0	65.8	27.2	0.0
Housing Units by Geography	66,817	0.0	7.1	66.9	26.0	0.0
Owner-Occupied Units by Geography	37,420	0.0	5.2	65.3	29.6	0.0
Occupied Rental Units by Geography	15,296	0.0	11.0	63.2	25.8	0.0
Vacant Units by Geography	14,101	0.0	7.9	75.2	17.0	0.0
Businesses by Geography	9,803	0.0	4.3	64.5	31.1	0.0
Farms by Geography	509	0.0	3.9	73.1	23.0	0.0
Family Distribution by Income Level	35,276	18.7	17.5	20.5	43.4	0.0
Household Distribution by Income Level	52,716	22.9	16.1	17.1	43.9	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$93,867
			Median Gross Rent			\$647
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition in the Oklahoma Non-MSA AA is high. Based on the FDIC Deposit Market Share Data as of June 30, 2021, FNBT holds 13.6 percent, or the second most, of the deposits in the AA. The Oklahoma Non-MSA AA accounts for over 99 percent of the bank's deposits and 87.7 percent of the bank's number of loans.

A community contact was consulted with operations in the AA to gain a better understanding of the general banking, developmental, and economic needs of the community. The community contact primarily has a community development purpose through services to LMI senior citizens by providing visits to seniors in assisted living centers, nursing homes, hospitals, veteran's centers, and other locations where senior citizens may be isolated from the community. The organization contacted is located in Ardmore, OK. The contact indicated that the critical needs for the LMI population in the area are primarily low-cost financial services, operating expenses from non-profits, and education assistance programs. The contact stated that many of their LMI clients do not have bank accounts and cannot afford the related account fees or do not have the financial capacity to maintain the required minimum balances to avoid fees. The contact noted that as college education costs have increased; there is an opportunity for organizations to offer opportunities for education scholarships.

Scope of Evaluation in Oklahoma

As noted in the Institution Description previously, there are no low-income geographies in either FNBT's AAs. As such, no rating is given for performance in low-income geographies for home mortgage loans or small business loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Oklahoma Non-MSA AA

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O 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's distribution of home mortgage loans in LMI geographies is satisfactory. The percent of bank home mortgage loans in moderate-income geographies is somewhat lower than the percent of homes in moderate-income geographies in the AA; however, the bank exceeds the aggregate peer comparison.

Small Loans to Businesses

Refer to Table Q 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's distribution of small business loans in LMI geographies is excellent. The percent of bank small business loans in moderate-income geographies exceeds the percent of small businesses in moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P 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's distribution of home mortgage loans to LMI individuals is satisfactory. The percent of bank home mortgage loans to low-income borrowers is lower than the percent of low-income families in the AA; however, the bank exceeds the aggregate peer comparison. Low-income individuals will have more

difficulty qualifying for a loan given the median housing value of \$93,867 and relatively low median rent prices in the Non-MSA AA. The percent of bank home mortgage loans to moderate-income individuals is somewhat lower than the percent of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R 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's distribution of small business loans to businesses earning less than \$1 million in gross annual revenue is satisfactory. The percent of bank small business loans to businesses earning less than \$1 million in gross annual revenue is near to the percentage of small businesses earning less than \$1 million in gross annual revenue in the AA.

OKC Partial MSA AA

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the OKC Partial MSA AA.

Home Mortgage Loans

Refer to Table O 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's distribution of home mortgage loans in LMI geographies is satisfactory. The percent of bank home mortgage loans in moderate-income geographies is near to the percent of homes in moderate-income geographies in the AA.

Small Loans to Businesses

Refer to Table Q 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's distribution of small business loans in LMI geographies is excellent. The percent of bank small business loans in moderate-income geographies exceeds the percent of small businesses in moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P 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's distribution of home mortgage loans to LMI individuals is satisfactory. The percent of bank home mortgage loans to low-income borrowers is somewhat lower than the percent of low-income families in the AA; however, more than double the aggregate peer comparison. The percent of bank home mortgage loans to moderate-income individuals exceeds the percent of moderate-income families in the AA.

Small Loans to Businesses

Refer to Table R 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's distribution of small business loans to businesses earning less than \$1 million in gross annual revenue is satisfactory. The percent of bank small business loans to businesses earning less than \$1 million in gross annual revenue is near to the percentage of small businesses earning less than \$1 million in gross annual revenue in the AA.

Responses to Complaints

There were no CRA-related complaints received by the bank nor the OCC during the evaluation period.

Community Development Test

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

Conclusions for Area Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% Of Total #	\$(000's)	% Of Total \$
OKC Partial MSA	8	24%	2,358	17%
OK Non-MSA	25	76%	11,509	83%

The bank's level of CD lending demonstrates adequate responsiveness, considering the bank's capacity and the need and availability of such opportunities for CD lending in the bank's AAs.

OKC Partial MSA AA

During the evaluation period, the bank originated or renewed 8 CD loans totaling \$2.4 million in the OKC Partial MSA AA. These loans include seven loans totaling \$2.2 million for economic development and one loan for \$199 thousand for community service within the AA.

Significant loans include two loans totaling \$450 thousand that were for leasehold improvements and to purchase equipment for a new pizza restaurant, one loan for \$467 thousand to purchase a gas station/convenience store, and three loans totaling \$544 thousand for a window and door company. All of the loans created or retained LMI jobs in a moderate-income tract.

While not included in the table above, FNBT was very active in the SBA Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. FNBT's participation resulted in the origination of 114 qualifying PPP loans totaling \$4.9 million that revitalized or stabilized the AA, including LMI areas and helped maintain LMI jobs.

Oklahoma Non-MSA AA

During the evaluation period, the bank originated or renewed 25 CD loans totaling \$11.5 million in the Oklahoma Non-MSA AA. These loans include 11 loans totaling \$6.2 million for economic development, six loans totaling \$4.5 million for community services, and eight loans totaling \$781 thousand to revitalize and stabilize a designated area within the AA.

Significant loans included one loan for \$1.4 million that was needed to meet the increased demand for face masks and medical products during the pandemic and to maintain LMI jobs. One loan for \$1.6 million was a renewal of loan originally for the construction of a hotel, which helped maintain LMI jobs. Four loans totaling \$2.8 million were for purchases and operations of a health clinic ran by volunteers that provides services to the uninsured and vulnerable populations. Five loans totaling \$715 thousand were extended in the Downtown Historic District contributing to revitalization/stabilization or economic development in the AA.

FNBT was very active in the SBA PPP within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. FNBT's participation resulted in the origination of 1,164 qualifying PPP loans totaling \$56.9 million that revitalized or stabilized the AA, including LMI areas and helped to maintain LMI jobs.

Number and Amount of Qualified Investments

The Community Development Investments Table, shown on the following page, sets forth the information and data used to evaluate the bank's level of CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% Of Total #	\$(000's)	% Of Total \$	#	\$(000's)
OKC Partial MSA	0	0	9	26	9	19.6	26	1.3	0	0
OK Non-MSA	3	570	34	1,375	37	80.4	1,945	98.6	0	0

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

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

The bank's level of investments and donations demonstrates adequate responsiveness to the needs of its AAs given performance context.

OKC Partial MSA AA

The bank's level of qualified investments and donations in the OKC Partial MSA AA reflects adequate responsiveness to the needs of the AA. The bank did not make any qualified investments in the OKC Partial MSA AA, but they made nine donations totaling \$26 thousand to qualified organizations in the AA during the evaluation period. Donations were made to local non-profit organizations that provide social services to at risk and abused children, food assistance and various programs that target LMI individuals, and to organizations that promote economic development in the AA.

Competition for qualified investments in the OKC Partial MSA AA is strong. There are limited qualified investments available, and it is often difficult for community banks to compete with the large nationwide and regional banks in the MSA.

Oklahoma Non-MSA AA

The bank's level of qualified investments and donations in the Oklahoma Non-MSA AA reflects adequate responsiveness to the needs of the AA. During the evaluation period, 37 CD investments and donations totaled \$1.9 million. FNBT invested in two qualified school bonds issued by Love County ISD totaling \$1.3 million. The investments in the Thackerville School system will be used to construct, furnish, and equip a new elementary school and gymnasium. More than 50 percent of the student population in the schools qualify for the free and reduced-lunch program. An additional \$570 thousand represents three prior period investments that are still outstanding. Two of the bonds were to renovate and repair Carter County ISD school facilities in Fox and one bond was to construct, furnish, and equip a new elementary school and gymnasium in Velma. More than 50 percent of the student population in the schools qualify for the free and reduced-lunch program.

The bank made 32 donations totaling \$75 thousand to qualified organizations in the AA during the evaluation period. Donations were made to local non-profit organizations that provide a wide variety of social services, affordable housing, literacy, healthcare services, and youth programs that target LMI persons. Donations were also made to organizations that promote economic development in the local communities in the AA.

There are few qualified CD investments available in the rural areas of Oklahoma. The majority of opportunities consist primarily of low-income school bonds, and competition is strong.

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services reflects excellent responsiveness within the AAs.

As a result of the pandemic, bank management was active in both AAs in assisting new and existing customers with obtaining SBA PPP loans and grants from the Oklahoma Business Relief Program (OBRP). OBRP offered funds to businesses that had suffered revenue loss due to the pandemic. FNBT bankers notified business customers that the Governor had designated funds for OBRP and when they were available. Grant applications were available at the bank and on their website. Bank loan officers assisted 127 customers with the OBRP application documents and submitted applications on the customer's behalf totaling \$2 million. There was no charge to customers for the assistance with the application; it was a donation of banker time to assist the small business customers that were impacted by the pandemic. Bank loan officers also assisted in originating 1,278 PPP loans for \$61.8 million in both AAs.

OKC Partial MSA AA

The level of qualified CD services reflects excellent responsiveness in the OKC Partial MSA AA. Three bank officers volunteer their time and serve in leadership positions in 10 different organizations. Bank officers serve in organizations that are involved in economic and small business development activities, community services to LMI families, and revitalization and stabilization. They provide technical expertise and financial assistance to these organizations. Examples of qualifying CD services include the following:

- ***Chamber of Commerce/Eastside Business Association of Norman***

A bank officer is a board member of the Chamber and a member of the Small Business Council Ambassador Committee. The officer provides technical expertise through involvement with planning, budgeting, and financing, among other activities. The Chamber and Committee are active with regard to economic development and the retention and recruiting of new businesses within their community. Another bank officer is President of the Eastside Business Association which focuses on the LMI areas of Norman. All informational and community programs directly relate to LMI activity.

- ***Bethesda, Inc.***

A bank officer is a board member, President in 2021 and Chairman of the Finance Committee. The organization is devoted to providing expert care for all children who have suffered the trauma of sexual abuse. No child is turned away or charged for services. The officer provides financial expertise on various matters within the organization.

- ***Rotary Club***

A bank officer is a board member and provides financial technical assistance to the organization. The organization helps meet community needs through volunteer activities and are dedicated to raising funds to sponsor assorted programs that serve to improve the lives of LMI children and the community at large. The Norman Rotary helps with a food pantry for high school students in family crisis so they can pursue an education without obstacles.

Oklahoma Non-MSA AA

The level of qualified CD services reflects excellent responsiveness in the Oklahoma Non-MSA AA. Sixteen bank officers volunteer their time and serve in leadership positions in 23 different organizations. Bank officers serve in organizations that are involved in economic and small business development activities, affordable housing, community services to LMI families, and revitalization and stabilization. They provide technical expertise and financial assistance to these organizations. Examples of qualifying CD services include the following:

- ***Ringling, Sulphur, and Marshall County Chambers of Commerce/Chamber of Commerce Foundation***
Bank officers are active in the local Chambers of Commerce. Four bank officers serve on the board and various committees of these organizations, as well as hold various officer positions within the Chambers. The Chamber of Commerce for these areas are focused on CD. They provide technical expertise through their involvement with the planning, budgeting, and financing activities. The Chambers are active with regard to economic development and the retention and recruiting of new businesses within their communities.
- ***Mercy Hospital Committees and Organizations/Duncan and Madill Hospital Organizations/Medical Equipment Assistance Program (MEAP)***
Several bank officers are involved in health care organizations that provide services and assist with programs to improve the quality of life in the AA. The officers use their banking and finance knowledge to assist the hospitals and committees on financial matters. Mercy Hospital, a nonprofit organization, is the premier health facility in Southern Oklahoma. Many of the patients can't afford health care. Mercy Hospital meets the essential health care needs for the public welfare of a large portion of South-Central Oklahoma. The Duncan hospital organization is a non-profit that serves the distressed and underserved Jefferson County communities. The Madill hospital is a County owned hospital that serves patients if they can pay or not. Marshall County has a high level of poverty. MEAP lends gently used medical equipment to people in South Central Oklahoma communities that cannot afford to purchase it.
- ***United Way Southern Oklahoma/United Way Stephens County***
Two officers are active in the local United Way organizations. Bank officers serve on the board and one officer in the Velma branch serves as Chairman of the Board and Chairman of the Financial Committee in Stephens County. The officers provide financial expertise on various matters within the organization. The United Way works to help improve the health, safety, education, and economic well-being of at-risk individuals and families.
- ***Salvation Army***
Two bank officers serve on the board of this non-profit organization that provides food, housing assistance, and job-related services to disadvantaged and homeless individuals.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2019, to December 31, 2021	
Bank Products Reviewed:	Home mortgage and small business 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
Oklahoma		
Oklahoma Non-MSA AA	Full-Scope	
OKC Partial MSA AA	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank and Trust Company of Ardmore			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
First National Bank and Trust Company of Ardmore	Satisfactory	Satisfactory	Satisfactory
State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight 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.

Distressed: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) An unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of five percent or more over the five-year period preceding the most recent census.

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

Small Loan(s) to Farm(s): A loan included in ‘loans to small farms’ as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Underserved: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

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

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data is not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

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

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% Of Total	Overall Market	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
OK Non-MSA AA	310	42,054	92.0	3,668	0.0	0.0	0.0	5.2	3.8	2.8	65.3	69.0	65.5	29.6	28.4	31.7	0.0	0.0	0.0		
OKC Partial MSA AA	27	4,639	9.6	14,107	0.0	0.0	0.0	9.4	9.1	8.4	49.9	40.7	40.9	40.8	51.9	50.7	0.0	0.0	0.0		
Total	337	46,693	100.0	17,775	0.0	0.0	0.0	7.8	4.3	7.2	55.4	66.8	46.0	36.7	30.3	46.8	0.0	0.0	0.0		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% Of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
OK Non-MSA AA	310	42,054	92.0	3,668	18.7	5.2	4.8	17.5	12.3	13.2	20.5	17.1	17.2	43.4	55.8	42.6	0.0	9.7	22.1		
OKC Partial MSA AA	27	4,639	10.0	14,107	17.3	9.1	4.3	15.8	20.0	15.8	21.9	14.8	18.8	45.0	33.3	34.2	0.0	44.4	26.9		
Total	337	46,693	100.0	17,775	17.8	5.0	4.4	16.4	11.6	15.2	21.4	16.9	18.5	44.4	54.0	36.0	0.0	12.5	25.9		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
OK Non-MSA AA	26	5,143	0.9	2,806	0.0	0.0	0.0	4.3	14.3	3.8	64.5	65.7	66.3	31.1	20.0	29.9	0.0	0.0	0.0	
OKC Partial MSA	35	4,772	0.06	5,574	0.0	0.0	0.0	14.6	15.4	12.7	41.4	57.7	39.1	43.9	26.9	48.2	0.2	0.0	0.1	
Total	61	9,915	0.7	8,380	0.0	0.0	0.0	11.4	14.8	9.7	48.5	61.7	48.2	40.0	23.5	42.1	0.2	0.0	0.0	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% Of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
OK Non-MSA AA	26	5,143	0.9	2,806	83.2	77.1	37.0	4.9	22.9	11.9	0.0		
OKC Partial MSA AA	35	4,772	0.06	5,574	90.0	76.9	28.5	2.7	23.1	7.3	0.0		
Total	61	9,915	0.7	8,380	87.9	77.0	31.4	3.4	23.0	8.7	0.0		

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%