PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Vision Bank
RSSD# 241157

101 East Main Street
Ada, Oklahoma 74820

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: ***Outstanding***
The Lending Test is rated: ***Satisfactory***
The Community Development Test is rated: ***Outstanding***

Vision Bank (the bank) is rated Outstanding. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside its AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects excellent responsiveness to the CD needs of the bank's AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AAs. Performance was assessed within the bank's two AAs. The East Central Oklahoma and Oklahoma City Metropolitan Statistical Area (MSA) AAs were assessed using full-scope reviews. Examiners reviewed the following data:

- The bank's 22-quarter average NLTD ratio;
- A statistical sample of 133 small business loans selected from a universe of 387 loans originated between January 1, 2023 and December 31, 2023;
- The universe of home purchase, refinance, home improvement, multifamily, and other purpose loans reported on the bank's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);

- CD loans, qualified investments, and CD services from January 1, 2019 to December 31, 2023.

When determining the overall institutional and lending test ratings, the greater weight was placed on the East Central Oklahoma AA, based on higher lending and deposit volumes, as well as the number of branches. With respect to the lending analysis, more emphasis was placed on home mortgage lending since this is a strategic focus of the bank and the largest product line in the bank's loan portfolio.

DESCRIPTION OF INSTITUTION

Vision Bank is a community bank headquartered in Ada, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Vision Bancshares, Inc., Ada, Oklahoma.
- The bank has total assets of $997.3 million as of June 30, 2024.
- In addition to its main office in Ada, the bank has eight additional full-service offices located in Ada, Davis, Durant, Meeker, Norman, Prague, Shawnee, and Sulphur, Oklahoma. The bank also operates a limited-service branch in Ada.
- The bank's network of automated teller machines (ATMs) includes 17 cash-only ATMs, 1 at each branch location, as well as 7 stand-alone ATMs.
- As shown in the table below, the bank's primary business focus is home mortgage and commercial lending.

Table 1

Composition of Loan Portfolio as of June 30, 2024		
Loan Type	**$(000)**	**%**
Construction and Land Development	57,625	8.5
Farmland	58,129	8.6
1- to 4-Family Residential Real Estate	266,168	39.4
Multifamily Residential Real Estate	14,106	2.1
Nonfarm Nonresidential Real Estate	172,798	25.6
Agricultural	2,996	0.4
Commercial and Industrial	54,397	8.0
Consumer	42,537	6.3
Other	7,209	1.1
Gross Loans	675,965	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its December 2, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA[1]

The performance evaluation first discusses the bank's overall performance, followed by a more in-depth analysis of the bank's record of lending and CD activities in the East Central Oklahoma AA and Oklahoma City MSA AA.

LENDING TEST

The bank's overall lending test performance is Satisfactory based on the institution's reasonable NLTD ratio; a majority of loans originated inside its AAs; a reasonable distribution of loans throughout the bank's AAs; and a reasonable distribution of lending to borrowers of different income levels and businesses of different revenue sizes. In determining the overall lending test rating, equal weight was given to each of the performance criteria.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and their locations within the bank's AAs. The bank's NLTD ratio is reasonable. The bank's 22-quarter average NLTD ratio was comparable to the range of the four similarly situated institutions, with ratios ranging from 74.5 percent to 89.8 percent.

Table 2

Comparative NLTD Ratios March 31, 2019 – June 30, 2024			
Institution	**Location**	**Asset Size $(000)**	**NLTD Ratio (%)**
			22 Quarter Average
Vision Bank	Ada, Oklahoma	997,260	78.4
Similarly Situated Institutions			
Quail Creek Bank	Oklahoma City, Oklahoma	797,742	74.5
Sovereign Bank	Shawnee, Oklahoma	1,098,902	77.1
First National Bank of Oklahoma	Oklahoma City, Oklahoma	796,616	86.4
First Bank & Trust Company	Duncan, Oklahoma	876,738	89.8

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[1] The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans, by number and dollar, inside the AAs.

Table 3

Loan Type	Inside				Outside			
	#	#%	$(000)	$%	#	#%	$(000)	$%
Home Purchase – Conventional	438	79.2	95,359	80.8	115	20.8	22,730	19.2
Home Improvement	22	81.5	2,360	81.4	5	18.5	538	18.6
Multifamily Housing	21	67.7	12,508	43.3	10	32.3	16,380	56.7
Other Purpose Closed-End	18	85.7	1,928	80.9	3	14.3	454	19.1
Refinancing	125	78.1	17,647	76.0	35	21.9	5,571	24.0
Total HMDA Related	**624**	**78.8**	**129,802**	**74.0**	**168**	**21.2**	**45,673**	**26.0**
Small Business	**111**	**83.5**	**10,328**	**78.3**	**22**	**16.5**	**2,861**	**21.7**
Total Loans	**735**	**79.5**	**140,130**	**74.3**	**190**	**20.5**	**48,534**	**25.7**

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. The bank's performance in the East Central Oklahoma AA is reasonable and carried the overall conclusion given the weighting of the AA. The bank's performance in the Oklahoma City MSA AA is excellent.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes. The criterion conclusions in each AA are consistent with the overall rating.

COMMUNITY DEVELOPMENT TEST

The bank's overall CD test performance is Outstanding and demonstrates excellent responsiveness to AA needs.

The CD test evaluates the bank's responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities in the bank's AAs.

For this evaluation, acknowledgement is given to the significant number of loans originated by the bank to area businesses and farms through the Small Business Administration's Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic). These loans were particularly responsive to the needs of small businesses and helped revitalize and stabilize distressed and/or underserved areas or LMI census tracts within the bank's AAs. Additionally, based on the bank meeting the CD needs of its AAs, consideration also was given to CD activities that took place outside of the bank's delineated AAs, but within the broader Oklahoma statewide area, totaling $8.5 million. Refer to Table 4 below for an itemized summary of the bank's CD activity.

Table 4

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	3	3,288	0	0	13	14	13	14	9
Community Services	10	5,341	44	23,368	66	214	110	23,582	241
Economic Development	252	73,554	1	1,081	63	151	64	1,232	67
Revitalization and Stabilization	287	10,632	0	0	0	0	0	0	0
Outside Activities	24	8,503	0	0	11	7	11	7	0
Totals	576	101,318	45	24,449	153	387	198	24,835	317

Note: Numbers may not add up due to rounding.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

EAST CENTRAL OKLAHOMA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE EAST CENTRAL OKLAHOMA AA

The bank's East Central Oklahoma AA consists of Bryan, Johnston, Murray, Pontotoc, and Pottawatomie Counties in their entirety. See Appendix A for an AA map and Appendix B for additional demographic data.

- The delineation of the AA has changed since the previous evaluation. It now includes the entirety of Johnston County and no longer includes a previously taken portion of Okfuskee County.
- The composition of the AA includes 1 low-, 6 moderate-, 35 middle-, and 11 upper-income census tracts. At the prior evaluation, the AA was comprised of 1 low-, 9 moderate-, 24 middle-, and 8 upper-income census tracts.
- The bank operates seven banking offices in the AA, including its headquarters. The bank maintains 14 cash-only ATMs, with 1 at each branch office and 7 stand-alone ATMs. The offices are located in Ada, Davis, Durant, Shawnee, and Sulphur.
- As of June 30, 2023, the bank held a 7.8 percent market share of deposits in the AA, ranking 2nd out of 22 FDIC-insured financial institutions with 59 banking offices operating in the AA.
- To further augment the CRA performance evaluation, a community contact was conducted to help ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact represented an economic development organization that serves the AA.

Table 5

Population Change			
Assessment Area: East Central Oklahoma			
Area	**2015 Population**	**2020 Population**	**Percent Change**
East Central Oklahoma	177,949	180,762	1.6
Bryan County, OK	44,003	46,067	4.7
Johnston County, OK	11,022	10,272	(6.8)
Murray County, OK	13,733	13,904	1.2
Pontotoc County, OK	38,055	38,065	0.0
Pottawatomie County, OK	71,136	72,454	1.9
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
Source: *2020 U.S. Census Bureau: Decennial Census*			
2011-2015 U.S. Census Bureau: American Community Survey			

- The AA population saw a net increase, with each county experiencing modest growth, with the exception of Johnston County, which experienced negative growth.
- Pottawatomie County contains 40.1 percent of the AA population and contains Shawnee, the largest city in the AA, with 31,377 residents in 2020.
- The community member stated that Bryan County is increasing in population due to its proximity to a main highway and the Dallas-Fort Worth Metropolitan Area.

Table 6

Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Median Family Income Change			
Assessment Area: East Central Oklahoma			
East Central Oklahoma	57,548	61,250	6.4
Bryan County, OK	53,786	56,874	5.7
Johnston County, OK	51,589	52,294	1.4
Murray County, OK	63,396	65,082	2.7
Pontotoc County, OK	61,152	65,208	6.6
Pottawatomie County, OK	58,196	63,813	9.7
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5

Source: *2011-2015 U.S. Census Bureau: American Community Survey*
　　　　2016-2020 U.S. Census Bureau: American Community Survey
Note: *Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- As Table 6 illustrates, the increase in median family income (MFI) in the AA was above the Oklahoma statewide nonmetropolitan figure, but comparable to the state of Oklahoma figure.
- Generally, MFIs in the AA did not significantly vary; however, Johnston County is the least affluent county in the AA.
- According to 2016-2020 American Community Survey (2020 ACS) data, the portion of families in the AA living below the poverty level, at 12.0 percent, was lower than the figure of 13.5 percent for nonmetropolitan areas statewide, but comparable to the state of Oklahoma at 11.3 percent.

Table 7

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
East Central Oklahoma	66.1	26.9	32.8	46.7	21.7	14.1
Bryan County, OK	74.5	33.2	34.5	50.1	23.4	15.1
Johnston County, OK	54.6	19.5	28.9	35.2	22.7	12.8
Murray County, OK	55.1	35.6	27.4	51.3	24.7	13.7
Pontotoc County, OK	66.5	21.8	30.8	50.5	17.6	13.2
Pottawatomie County, OK	63.5	24.9	34.4	44.7	21.7	14.3
NonMSA Oklahoma	65.0	27.9	34.8	46.6	21.0	14.8
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

- The housing cost burden for all renters and all owners in the AA was lower than the figures for nonmetropolitan areas statewide and the state of Oklahoma. The housing cost burden of owners in the AA is primarily driven by Bryan County, where 15.1 percent of all owners are cost burdened.
- The Johnston County housing affordability ratio[2] of 51.5 percent was the highest in the AA, while Pontotoc County had the lowest housing affordability ratio in the AA at 38.4 percent, indicating less affordable housing.
- The community member stated that the economic growth of Bryan County has resulted in a population increase in the area. Due to the population increase, there is growth in the housing industry in and around the AA.

Table 8

Unemployment Rates Assessment Area: East Central Oklahoma					
Area	2018	2019	2020	2021	2022
East Central Oklahoma	3.2	3.2	5.8	3.8	3.1
Bryan County, OK	3.1	2.9	5.2	3.4	2.7
Johnston County, OK	2.8	4.1	7.8	4.8	3.7
Murray County, OK	2.8	2.9	6.3	4.1	3.0
Pontotoc County, OK	3.0	3.0	5.3	3.5	2.8
Pottawatomie County, OK	3.6	3.5	6.3	4.0	3.4
NonMSA Oklahoma	3.5	3.4	6.1	4.0	3.2
Oklahoma	3.3	3.1	6.3	4.0	3.0

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

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[2] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- Unemployment rates spiked in 2020 at the onset of the pandemic before returning to pre-pandemic levels in 2022.
- Major employment sectors in the AA include healthcare and social assistance (10,700 employees); retail trade (7,414); public administration (4,869); educational services (4,152); and manufacturing (1,021).
- The community member noted that job opportunities are prominent in the mining, manufacturing, and education industries in the AA. Bryan County has also experienced an overall increase in employment resulting from the construction of area distribution centers and university expansions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EAST CENTRAL OKLAHOMA AA

LENDING TEST

The lending test performance in the East Central Oklahoma AA is reasonable. In determining the lending test rating, equal weight was given to each of the performance criteria. The review in this AA consisted of an evaluation of 451 home mortgage and 95 small business loans. Home improvement and multifamily loans were not evaluated at the product level due to lending volumes being too low to render a meaningful analysis. Greater weight was placed on the bank's home mortgage lending performance as this is a strategic focus of the bank and the largest product in its loan portfolio.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage lending is reasonable, while the distribution of small business lending is poor.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. In 2023, home mortgage lending in the low-income census tract was above the aggregate lending data by number and dollar volume, and above the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and above by dollar volume, and comparable to the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected performance below 2023 levels and, with more originations, supported the overall conclusion.

An analysis of the dispersion of loans was conducted and revealed a gap that included an LMI census tract. The gap was located in an area geographically distant from the bank's branches, and thus, did not impact the conclusion.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. In 2023, home purchase lending in the low-income census tract was comparable to the aggregate lending data by number and dollar volume, and above the demographic figure. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar volume and comparable to the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected performance comparable to 2023 levels.

An analysis of the dispersion of loans was conducted and revealed a gap that included an LMI census tract. The gap was located in an area geographically distant from the bank's branches, and thus, did not impact the conclusion.

Refinance Lending

The geographic distribution of refinance lending is reasonable. In 2023, refinance lending in both low- and moderate-income census tracts was above the aggregate lending data by number and dollar volume, and above the respective demographic figures.

The geographic distribution of home mortgage refinance lending in 2022 reflected performance below 2023 levels and, with more originations, supported the overall conclusion.

An analysis of the dispersion of loans was conducted and revealed gaps that included an LMI census tract. There was a low volume of lending relative to the number of census tracts, thus these gaps did not impact the conclusion.

Table 9

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: East Central Oklahoma												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Owner Occupied Units %**
	2022						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	3	1.5	0.7	286	0.8	0.5	2	1.7	1.2	136	0.6	0.5	0.7
Moderate	8	4.1	9.1	1,376	3.7	7.4	9	7.8	7.4	1,215	5.3	5.6	6.5
Middle	130	66.0	65.1	23,526	62.4	63.8	72	62.6	64.8	14,301	62.0	62.7	65.1
Upper	56	28.4	25.1	12,496	33.2	28.4	32	27.8	26.7	7,400	32.1	31.2	27.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	197	100.0	100.0	37,684	100.0	100.0	115	100.0	100.0	23,052	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.7	0	0.0	0.5	1	3.0	0.9	53	1.0	0.5	0.7
Moderate	6	9.4	6.8	476	5.8	5.4	4	12.1	6.2	462	9.1	4.7	6.5
Middle	35	54.7	62.4	4,476	54.9	61.2	20	60.6	67.0	2,973	58.8	65.7	65.1
Upper	23	35.9	30.0	3,206	39.3	32.8	8	24.2	26.0	1,565	31.0	29.0	27.6
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	8,158	100.0	100.0	33	100.0	100.0	5,053	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.2	0	0.0	1.2	0	0.0	0.5	0	0.0	0.3	0.7
Moderate	1	16.7	6.6	90	22.0	6.0	0	0.0	8.2	0	0.0	9.8	6.5
Middle	5	83.3	62.1	320	78.0	62.5	5	50.0	62.5	291	33.4	59.0	65.1
Upper	0	0.0	29.1	0	0.0	30.3	5	50.0	28.8	580	66.6	30.9	27.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	410	100.0	100.0	10	100.0	100.0	871	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	6.5	0	0.0	4.4	5	45.5	23.1	1,436	28.1	12.4	7.3
Moderate	0	0.0	9.7	0	0.0	5.0	1	9.1	11.5	1,300	25.4	12.1	28.4
Middle	3	100.0	77.4	1,050	100.0	84.8	4	36.4	53.8	2,114	41.3	71.6	48.0
Upper	0	0.0	6.5	0	0.0	5.8	1	9.1	11.5	264	5.2	3.9	16.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,050	100.0	100.0	11	100.0	100.0	5,114	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	4	1.4	0.8	311	0.6	0.6	8	4.6	1.2	1,625	4.7	0.9	0.7
Moderate	15	5.4	8.2	1,942	4.0	6.8	14	8.0	7.2	2,977	8.6	5.7	6.5
Middle	178	64.3	64.4	30,161	62.6	63.8	103	59.2	64.8	19,817	57.3	63.6	65.1
Upper	80	28.9	26.5	15,735	32.7	28.8	49	28.2	26.7	10,143	29.3	29.7	27.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	277	100.0	100.0	48,149	100.0	100.0	174	100.0	100.0	34,562	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
        2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt. And Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is poor. The distribution of loans in both low- and moderate-income census tracts was below the respective demographic figure, which represents the percentage of businesses in each census tract income level. Three-year average aggregate lending data from institutions required to report CRA small business data was referenced to augment the evaluation and reflected lending in the AA's low-income census tract at 2.6 percent by number and 2.5 percent by dollar. The three-year average in moderate-income census tracts was 12.0 percent by number and 13.6 percent by dollar. While these figures are not direct comparators as the bank does not report CRA small business lending data, it suggests there is demand for small business lending in these census tracts.

Additionally, a conspicuous gap was identified that includes LMI census tracts and is not explained by performance context, which further supports the conclusion.

Table 10

Geographic Income Level	\multicolumn{4}{c}{Bank Loans}	Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	3.7
Moderate	5	5.3	261	2.9	13.1
Middle	76	80.0	5,824	64.8	61.0
Upper	14	14.7	2,903	32.3	22.3
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	95	100.0	8,988	100.0	100.0

Distribution of 2023 Small Business Lending By Income Level of Geography
Assessment Area: East Central Oklahoma

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The distribution of home mortgage and small business lending reflects reasonable performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2023, home mortgage lending to low-income borrowers was comparable to the aggregate lending data by number and dollar volume, and below the demographic figure, which represents the

percentage of families by income level. Lending to moderate-income borrowers was comparable to the aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The borrower distribution of 2022 home mortgage lending reflected performance comparable to 2023 levels.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. In 2023, home purchase lending to low-income borrowers was comparable to the aggregate lending data by number and above by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The borrower distribution of 2022 home purchase lending reflected performance comparable to 2023 levels.

Refinance Lending

The borrower distribution of home mortgage refinance lending is reasonable. In 2023, refinance lending to low-income borrowers was above the aggregate lending data by number and dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate lending data by number volume and dollar volume, and comparable to the demographic figure.

The borrower distribution of 2022 home mortgage refinance lending reflected performance comparable to 2023 levels.

Table 11

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	

<p align="center">Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level
Assessment Area: East Central Oklahoma</p>

Home Purchase Loans

Borrower Income Level	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	Families %
Low	8	4.1	3.0	757	2.0	1.5	4	3.5	2.6	486	2.1	1.3	19.7
Moderate	25	12.7	13.1	2,800	7.4	8.5	16	13.9	13.1	2,217	9.6	8.1	16.5
Middle	23	11.7	20.9	3,880	10.3	18.9	12	10.4	21.7	1,964	8.5	18.4	20.8
Upper	120	60.9	42.1	26,964	71.6	51.1	60	52.2	39.0	15,533	67.4	50.0	43.0
Unknown	21	10.7	20.9	3,283	8.7	19.9	23	20.0	23.7	2,852	12.4	22.2	0.0
Total	197	100.0	100.0	37,684	100.0	100.0	115	100.0	100.0	23,052	100.0	100.0	100.0

Refinance Loans

Borrower Income Level	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	Families %
Low	7	10.9	5.4	748	9.2	2.5	2	6.1	3.2	136	2.7	1.5	19.7
Moderate	6	9.4	13.8	520	6.4	9.4	4	12.1	14.8	483	9.6	9.8	16.5
Middle	6	9.4	22.8	722	8.9	20.7	10	30.3	23.0	1,267	25.1	18.9	20.8
Upper	33	51.6	41.4	4,903	60.1	50.7	14	42.4	43.1	2,334	46.2	52.6	43.0
Unknown	12	18.8	16.7	1,265	15.5	16.6	3	9.1	15.9	833	16.5	17.2	0.0
Total	64	100.0	100.0	8,158	100.0	100.0	33	100.0	100.0	5,053	100.0	100.0	100.0

Home Improvement Loans

Borrower Income Level	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	Families %
Low	3	50.0	7.9	176	42.9	4.8	1	10.0	5.3	15	1.7	3.5	19.7
Moderate	0	0.0	9.3	0	0.0	6.1	2	20.0	8.7	92	10.6	4.7	16.5
Middle	1	16.7	22.0	93	22.7	16.7	3	30.0	24.5	175	20.1	23.2	20.8
Upper	1	16.7	47.6	90	22.0	56.2	3	30.0	49.5	498	57.2	55.6	43.0
Unknown	1	16.7	13.2	51	12.4	16.1	1	10.0	12.0	91	10.4	13.0	0.0
Total	6	100.0	100.0	410	100.0	100.0	10	100.0	100.0	871	100.0	100.0	100.0

Total Home Mortgage Loans

Borrower Income Level	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	Families %
Low	18	6.6	3.9	1,681	3.6	1.8	7	4.3	3.1	637	2.2	1.5	19.7
Moderate	34	12.4	12.8	3,578	7.6	8.6	23	14.1	13.4	2,865	9.7	8.5	16.5
Middle	31	11.3	21.3	4,818	10.2	19.2	27	16.6	21.9	3,716	12.6	18.5	20.8
Upper	156	56.9	42.5	32,247	68.5	51.2	79	48.5	41.3	18,454	62.7	50.8	43.0
Unknown	35	12.8	19.5	4,775	10.1	19.2	27	16.6	20.3	3,776	12.8	20.7	0.0
Total	274	100.0	100.0	47,099	100.0	100.0	163	100.0	100.0	29,448	100.0	100.0	100.0

Source: *2023 FFIEC Census Data*

2016-2020 U.S. Census Bureau: American Community Survey

Note: *Percentages may not total 100.0 percent due to rounding.*

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt. And Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with gross annual revenues of $1 million or less was comparable to the demographic figure, which represents the percentage of total businesses by revenue size in the AA. Additionally, three-year average aggregate small business lending data reflected lending to businesses with gross annual revenues of $1 million or less at

46.7 percent by number and 40.0 percent by dollar in the bank's AA. While these figures are not direct comparators as the bank does not report CRA small business lending data, these figures reflect a lower demand for small business lending in the AA than depicted by the demographic figure.

Table 12

Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: East Central Oklahoma					
	Bank Loans				Total
	#	#%	$(000)	$%	Businesses %
By Revenue					
$1 Million or Less	77	81.1	4,954	55.1	90.2
Over $1 Million	12	12.6	3,619	40.3	7.7
Revenue Unknown	6	6.3	415	4.6	2.0
Total	95	100.0	8,988	100.0	100.0
By Loan Size					
$100,000 or Less	78	82.1	3,028	33.7	
$100,001 - $250,000	9	9.5	1,421	15.8	
$250,001 - $1 Million	8	8.4	4,539	50.5	
Total	95	100.0	8,988	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	69	89.6	2,582	52.1	
$100,001 - $250,000	5	6.5	767	15.5	
$250,001 - $1 Million	3	3.9	1,605	32.4	
Total	77	100.0	4,954	100.0	
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates excellent responsiveness to the AA's needs. The bank originated 278 PPP loans totaling $10.1 million, which provided essential financing to small business and supported revitalization and stabilization efforts in the AA. A majority of the remaining CD loans were for economic development, helping to finance small businesses and create/retain jobs for LMI individuals. Most of the bank's qualified investments were school bonds to Title I schools, where greater than 50 percent of the students are on the free and reduced lunch program. In addition, a $1.1 million investment supported economic development, bringing hundreds of jobs to a moderate-income area.

Table 13

Community Development Purpose	Community Development Loans		Qualified Investments							Community Development Services
			Investments		Donations		Total Investments			
	#	$(000)	#	$(000)	#	$(000)	#	$(000)		#
Affordable Housing	3	3,288	0	0	12	13	12	13		9
Community Services	9	5,310	37	20,049	49	172	86	20,221		174
Economic Development	216	64,633	1	1,081	45	122	46	1,202		41
Revitalization and Stabilization	279	10,356	0	0	0	0	0	0		0
Totals	**507**	**83,587**	**38**	**21,130**	**106**	**306**	**144**	**21,436**		**224**

Note: Numbers may not add up due to rounding.

OKLAHOMA CITY MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY MSA AA

The bank's Oklahoma City MSA AA consists of Canadian, Cleveland, Grady, Lincoln, Logan, Oklahoma, and McClain Counties in their entirety, which also comprise the Oklahoma City, Oklahoma MSA in its entirety. See Appendix A for an AA map and Appendix B for additional demographic data.

- The delineation of the AA has changed since the previous evaluation. The AA previously consisted of only two contiguous census tracts located in Lincoln County. This delineation is used for the review period between January 1, 2019 and December 31, 2020. The AA now includes the entire Oklahoma City MSA and is used for the review period starting January 1, 2021.
- The composition of the AA includes 30 low-, 104 moderate-, 147 middle-, 119 upper-, and 19 unknown-income census tracts. At the prior evaluation, the AA was comprised of 2 middle-income census tracts.
- The bank operates three banking offices in the AA. The bank maintains three cash-only ATMs, each one located at a banking office. The offices are located in Meeker, Norman, and Prague.
- As of June 30, 2023, the bank held a 0.3 percent market share of deposits in the AA, ranking 48th out of 70 FDIC-insured financial institutions with 392 banking offices operating in the AA.
- To further augment the CRA performance evaluation, two community contacts conducted during the CRA evaluations of other banks operating in the AA were referenced to help ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. One contact represented an economic development organization and the other represented a housing agency.

Table 14

Population Change Assessment Area: Oklahoma City MSA			
Area	2015 Population	2020 Population	Percent Change
Oklahoma City MSA	1,318,408	1,425,695	8.1
Canadian County, OK	126,193	154,405	22.4
Cleveland County, OK	268,614	295,528	10.0
Grady County, OK	53,612	54,795	2.2
Lincoln County, OK	34,504	33,458	(3.0)
Logan County, OK	44,493	49,555	11.4
McClain County, OK	36,512	41,662	14.1
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau: Decennial Census *2011-2015 U.S. Census Bureau: American Community Survey*			

- The AA population saw a net increase from 2015 to 2020, with each county experiencing modest growth, with the exception of Lincoln County, which experienced negative growth, and Canadian County, which grew at more than double the AA growth rate.
- Oklahoma County contains 55.9 percent of the AA population and contains Oklahoma City, the largest city in the AA, with 681,054 residents in 2020.
- A member of the community stated that Canadian County's population growth from 2015 to 2020 was driven by its proximity to the major labor marketplace of the Oklahoma City area. Many locals have chosen to live in Canadian County so they can travel to work in Oklahoma County. Around 30 percent of the citizens residing in Canadian County are commuting daily to work in Oklahoma County.

Table 15

	Median Family Income Change		
	Assessment Area: Oklahoma City MSA		
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Oklahoma City MSA	69,988	75,170	7.4
Canadian County, OK	79,529	85,700	7.8
Cleveland County, OK	76,689	80,924	5.5
Grady County, OK	67,163	75,100	11.8
Lincoln County, OK	60,374	63,261	4.8
Logan County, OK	73,817	90,430	22.5
McClain County, OK	75,587	80,385	6.3
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma	63,401	67,511	6.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey			
2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- As Table 18 illustrates, the increase in median MFI in the AA was above the figure for the state of Oklahoma, with Logan County having the most significant increase in the AA. Due to this increase, Logan County now has the highest MFI in the AA.
- MFIs in the AA varied. Lincoln County had the lowest MFI and growth and is more rural in nature, despite being part of the MSA.
- According to 2020 ACS data, the portion of families in the AA living below the poverty level, at 9.5 percent, was below the state of Oklahoma, at 11.3 percent.

Table 16

	Housing Cost Burden					
	Assessment Area: Oklahoma City MSA					
	Cost Burden – Renters			**Cost Burden – Owners**		
Area	**Low Income**	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Oklahoma City MSA	75.0	30.2	39.9	52.0	26.4	15.3
Canadian County, OK	73.3	30.8	32.6	50.7	32.7	13.4
Cleveland County, OK	76.6	35.1	39.4	61.3	31.5	14.8
Grady County, OK	63.2	13.0	29.5	35.7	15.9	11.5
Lincoln County, OK	54.3	10.7	29.9	38.2	26.3	15.2
Logan County, OK	59.2	18.3	36.4	42.4	32.0	14.2
McClain County, OK	82.2	16.1	45.0	46.8	20.0	13.2
Oklahoma County, OK	75.9	29.9	41.1	53.2	24.7	16.3
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2
Cost Burden is housing cost that equals 30 percent or more of household income.						
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

- The housing cost burden for all renters and all owners in the AA was slightly above figures for the state of Oklahoma. The housing cost burden of owners in the AA is primarily driven by housing costs in Oklahoma County, where 16.3 percent of all owners are considered cost burdened.
- The Grady County housing affordability ratio of 45.8 percent was the highest in the AA, while Oklahoma County had the lowest housing affordability ratio in the AA, at 35.3 percent.
- A community member stated that the largest issue in the area was a lack of affordable housing, which is now compounded by rising interest rates.

Table 17

Unemployment Rates Assessment Area: Oklahoma City MSA					
Area	2018	2019	2020	2021	2022
Oklahoma City MSA	3.0	2.9	6.2	3.9	2.8
Canadian County, OK	2.7	2.7	6.0	3.4	2.5
Cleveland County, OK	2.8	2.7	5.7	3.4	2.5
Grady County, OK	2.9	3.0	6.3	3.6	2.7
Lincoln County, OK	3.4	3.4	5.8	3.7	3.0
Logan County, OK	2.9	2.7	5.3	3.4	2.7
McClain County, OK	2.7	2.6	5.6	3.3	2.7
Oklahoma County, OK	3.2	3.0	6.6	4.2	2.9
Oklahoma	3.3	3.1	6.3	4.0	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates spiked in 2020 at the onset of the pandemic. Unemployment rates in 2022 returned to pre-pandemic levels.
- Major employment sectors in the AA include healthcare and social assistance (92,320 employees); retail trade (83,751); accommodation and food services (31,048); educational services (25,851); and construction (5,973).
- A community member noted that the largest single-site employer in the state of Oklahoma, and located in Oklahoma County, is the Tinker Air Force Base with 26,000 employees. Other major employers in the area are the University of Oklahoma and the Oklahoma Postal Training Center.
- A community member stated that the rapid economic and business growth of Canadian County and its proximity to Oklahoma County has resulted in a population increase in the area. Due to the population increase, there is growth in the housing industry in and around the AA. Housing prices continue to rise as new homes are built and purchased.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY MSA AA

LENDING TEST

The bank's overall lending test performance in the Oklahoma City MSA AA is reasonable. In determining the lending test rating, equal weight was given to each of the performance criteria. The review in this AA consisted of an evaluation of 173 home mortgage loans. Small business lending, home improvement, multifamily, and refinance loans were not evaluated at the product level due to lending volumes being too low to render a meaningful analysis.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage lending is excellent.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. In 2023, home mortgage lending in low-income census tracts was comparable to the aggregate lending data by number, above by dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data by number and dollar volume, and above the demographic figure.

The geographic distribution of home mortgage lending in 2022 reflected performance consistent with 2023 levels.

An analysis of the dispersion of loans was conducted and revealed conspicuous lending gaps that included LMI census tracts. The gaps were due to the bank's limited branch presence and relatively low volume of originations in a large metropolitan area, and thus, did not impact the overall conclusion.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. In 2023, home purchase lending in low-income census tracts was comparable to the aggregate lending data by number, above by dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data by number and dollar volume, and above the demographic figure.

The geographic distribution of home purchase lending in 2022 reflected performance comparable to 2023 levels.

An analysis of the dispersion of loans was conducted and revealed conspicuous lending gaps that included LMI census tracts. The gaps were due to the bank's limited branch presence and relatively low volume of originations in a large metropolitan area, and thus, did not impact the overall conclusion.

Table 18

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Oklahoma City MSA												
	Bank And Aggregate Loans By Year											Owner Occupied Units %
Geographic Income Level	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	3.5	2.4	201	1.6	1.5	2	2.9	3.3	1,308	6.0	2.1	3.4
Moderate	19	33.3	15.8	2,624	20.3	10.6	20	29.0	15.7	5,063	23.4	10.9	18.0
Middle	21	36.8	37.2	4,620	35.7	31.9	28	40.6	36.4	8,391	38.7	32.0	40.1
Upper	15	26.3	44.0	5,499	42.5	55.5	19	27.5	43.9	6,917	31.9	54.5	37.7
Unknown	0	0.0	0.6	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	12,944	100.0	100.0	69	100.0	100.0	21,679	100.0	100.0	100.0
Refinance Loans													
Low	1	5.6	2.4	119	4.0	1.3	1	10.0	3.1	138	9.4	1.7	3.4
Moderate	11	61.1	15.8	1,732	58.3	11.8	3	30.0	17.7	166	11.3	12.2	18.0
Middle	3	16.7	37.9	302	10.2	32.1	2	20.0	39.4	366	25.0	34.8	40.1
Upper	3	16.7	43.1	818	27.5	54.6	4	40.0	39.4	795	54.3	51.0	37.7
Unknown	0	0.0	0.9	0	0.0	0.7	0	0.0	0.5	0	0.0	0.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,971	100.0	100.0	10	100.0	100.0	1,465	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.5	0	0.0	1.8	0	0.0	3.0	0	0.0	3.0	3.4
Moderate	1	50.0	12.4	35	25.2	10.6	1	25.0	14.3	60	6.4	10.7	18.0
Middle	0	0.0	35.2	0	0.0	30.4	2	50.0	37.8	728	77.4	34.1	40.1
Upper	1	50.0	49.2	104	74.8	56.6	1	25.0	44.0	152	16.2	51.6	37.7
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	0.8	0	0.0	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	139	100.0	100.0	4	100.0	100.0	940	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	16.7	14.0	450	9.8	12.6	0	0.0	7.9	0	0.0	6.4	7.3
Moderate	2	33.3	31.3	2,926	63.5	37.0	1	100.0	36.2	1,738	100.0	37.0	34.7
Middle	2	33.3	38.3	419	9.1	33.4	0	0.0	31.1	0	0.0	26.8	37.5
Upper	1	16.7	14.0	811	17.6	15.6	0	0.0	24.3	0	0.0	27.8	17.2
Unknown	0	0.0	2.5	0	0.0	1.4	0	0.0	0.6	0	0.0	1.9	3.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	4,606	100.0	100.0	1	100.0	100.0	1,738	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	4.6	2.4	770	3.7	2.6	3	3.5	3.2	1,446	5.5	2.3	3.4
Moderate	34	39.1	15.7	7,411	35.2	13.3	26	30.2	15.7	7,172	27.5	12.4	18.0
Middle	27	31.0	37.3	5,380	25.6	32.0	32	37.2	37.0	9,485	36.4	32.1	40.1
Upper	22	25.3	44.0	7,468	35.5	51.4	25	29.1	43.4	7,959	30.5	52.6	37.7
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	0.6	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	87	100.0	100.0	21,029	100.0	100.0	86	100.0	100.0	26,062	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
      2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt. And Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Lending to Borrowers of Different Income Levels

The bank's lending has a reasonable distribution among individuals of different income levels. The distribution of home mortgage lending reflects reasonable performance.

<u>Home Mortgage Lending</u>

The borrower distribution of home mortgage lending is reasonable. The distribution of 2023 loans to low-income borrowers was comparable to the aggregate lending data by number, below by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below the aggregate lending data by number, dollar volume, and the demographic figure. As mentioned by a community member, rising interest rates have impacted LMI borrowers' ability to qualify for mortgage loans. Analysis of the bank's refinance lending data within the total home mortgage lending confirms this impact as refinance lending to moderate-income borrowers in 2023 declined significantly compared to 2022. In consideration of this environmental factor, the bank's total home mortgage lending to LMI borrowers is reasonable.

The overall borrower distribution of 2022 home mortgage lending reflected performance comparable to 2023 levels. As noted above, however, the bank's refinance lending to moderate-income borrowers within total home mortgage lending exceeded aggregate lending performance by number in 2022.

<u>Home Purchase Lending</u>

The borrower distribution of home purchase lending is poor. The distribution of 2023 loans to both low- and moderate-income borrowers was below the aggregate lending data by number, dollar volume, and the demographic figure.

The borrower distribution of 2022 home purchase lending reflected performance comparable to 2023 levels. While factors such as the lack of affordable housing and rising interest rates impact the bank's ability to originate home purchase loans, aggregate lending data is also an indicator of demand and the availability of alternative mortgage products to assist LMI borrowers. Therefore, the bank's performance is considered poor.

Table 19

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Oklahoma City MSA											
	Bank And Aggregate Loans By Year											Families by Family Income %
Borrower Income Level	2022						2023					
	Bank		Agg	Bank	Agg		Bank		Agg	Bank	Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans												
Low	3	5.3	6.2	509	3.9	3.4	2	2.9	4.7	129	0.6	2.4	21.1
Moderate	4	7.0	16.6	486	3.8	12.6	6	8.7	16.3	1,069	4.9	11.4	17.6
Middle	10	17.5	18.5	1,950	15.1	17.9	11	15.9	18.7	2,746	12.7	16.9	20.5
Upper	21	36.8	29.5	6,387	49.3	40.0	26	37.7	30.9	9,763	45.0	41.5	40.8
Unknown	19	33.3	29.3	3,612	27.9	26.2	24	34.8	29.3	7,972	36.8	27.9	0.0
Total	57	100.0	100.0	12,944	100.0	100.0	69	100.0	100.0	21,679	100.0	100.0	100.0
Refinance Loans												
Low	1	5.6	8.0	63	2.1	4.1	2	20.0	7.0	105	7.2	3.4	21.1
Moderate	4	22.2	17.8	397	13.4	12.5	0	0.0	15.4	0	0.0	10.2	17.6
Middle	3	16.7	21.0	262	8.8	18.5	0	0.0	18.4	0	0.0	15.5	20.5
Upper	3	16.7	30.2	1,317	44.3	40.7	1	10.0	32.5	162	11.1	41.6	40.8
Unknown	7	38.9	23.1	932	31.4	24.2	7	70.0	26.7	1,198	81.8	29.3	0.0
Total	18	100.0	100.0	2,971	100.0	100.0	10	100.0	100.0	1,465	100.0	100.0	100.0
Home Improvement Loans												
Low	1	50.0	6.9	35	25.2	4.1	1	25.0	6.4	60	6.4	3.8	21.1
Moderate	0	0.0	14.7	0	0.0	9.5	1	25.0	17.3	163	17.3	11.8	17.6
Middle	0	0.0	20.0	0	0.0	16.1	0	0.0	20.7	0	0.0	16.1	20.5
Upper	1	50.0	49.9	104	74.8	56.4	1	25.0	47.6	565	60.1	56.6	40.8
Unknown	0	0.0	8.5	0	0.0	14.0	1	25.0	8.0	152	16.2	11.7	0.0
Total	2	100.0	100.0	139	100.0	100.0	4	100.0	100.0	940	100.0	100.0	100.0
Total Home Mortgage Loans												
Low	5	6.2	6.7	607	3.7	3.5	6	7.1	5.2	389	1.6	2.6	21.1
Moderate	8	9.9	16.5	883	5.4	12.4	7	8.2	16.2	1,232	5.1	11.2	17.6
Middle	15	18.5	19.1	2,345	14.3	17.9	11	12.9	19.0	2,746	11.3	16.7	20.5
Upper	27	33.3	31.1	8,044	49.0	40.5	29	34.1	33.2	10,635	43.7	42.1	40.8
Unknown	26	32.1	26.7	4,544	27.7	25.7	32	37.6	26.4	9,322	38.3	27.3	0.0
Total	81	100.0	100.0	16,423	100.0	100.0	85	100.0	100.0	24,324	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt. And Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates excellent responsiveness. The bank originated nine PPP loans totaling $177,113. The majority of non-PPP loans were classified as economic development, helping to finance small businesses and create/retain jobs for LMI individuals. All of the bank's qualified investments were school

bonds for Title I schools where greater than 50 percent of the students are on the free and reduced lunch program.
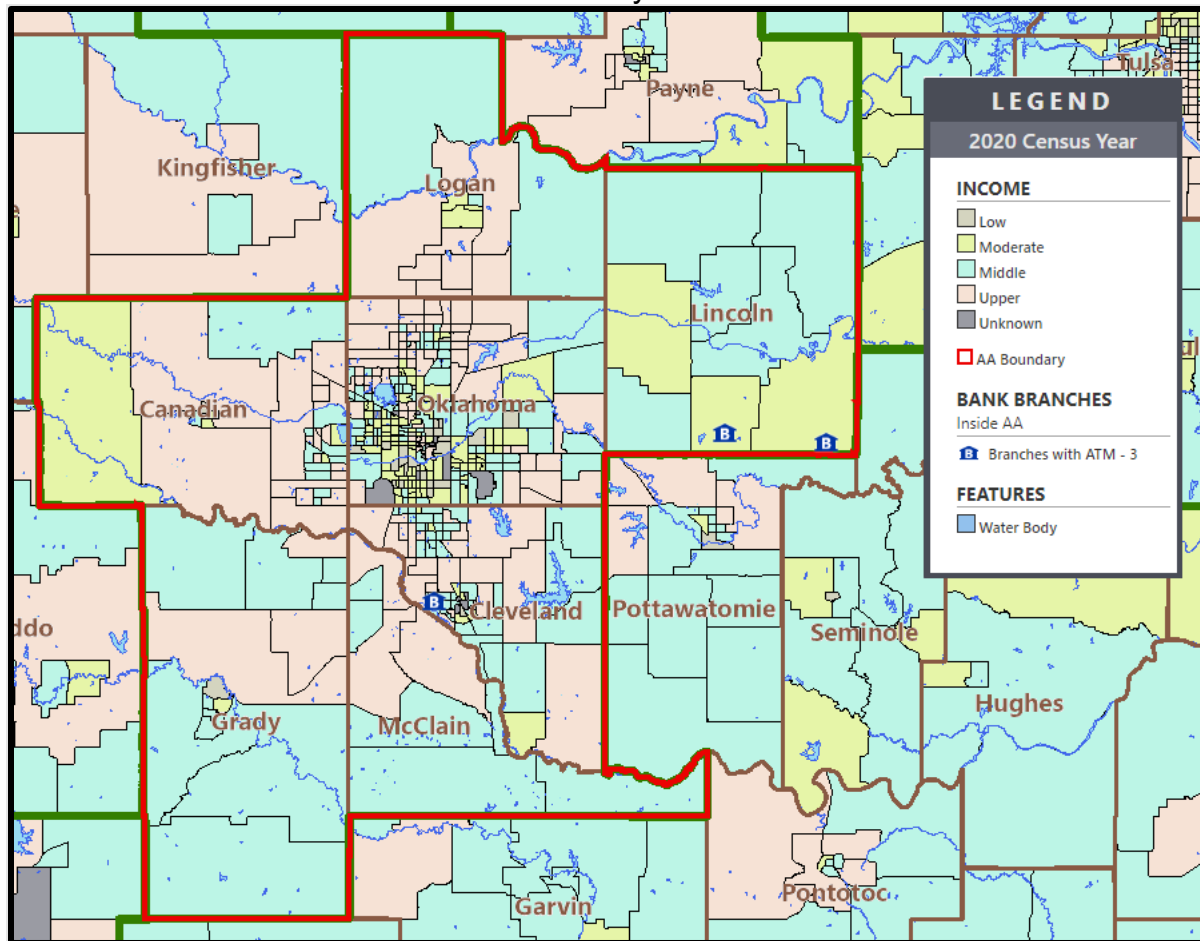
Table 20

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	0	0	0	0	1	1	1	1	0
Community Services	1	31	7	3,319	17	43	24	3,361	67
Economic Development	36	8,921	0	0	18	30	18	30	26
Revitalization and Stabilization	8	276	0	0	0	0	0	0	0
Totals	45	9,228	7	3,319	36	73	43	3,392	93

Note: Numbers may not add up due to rounding.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

East Central Oklahoma AA
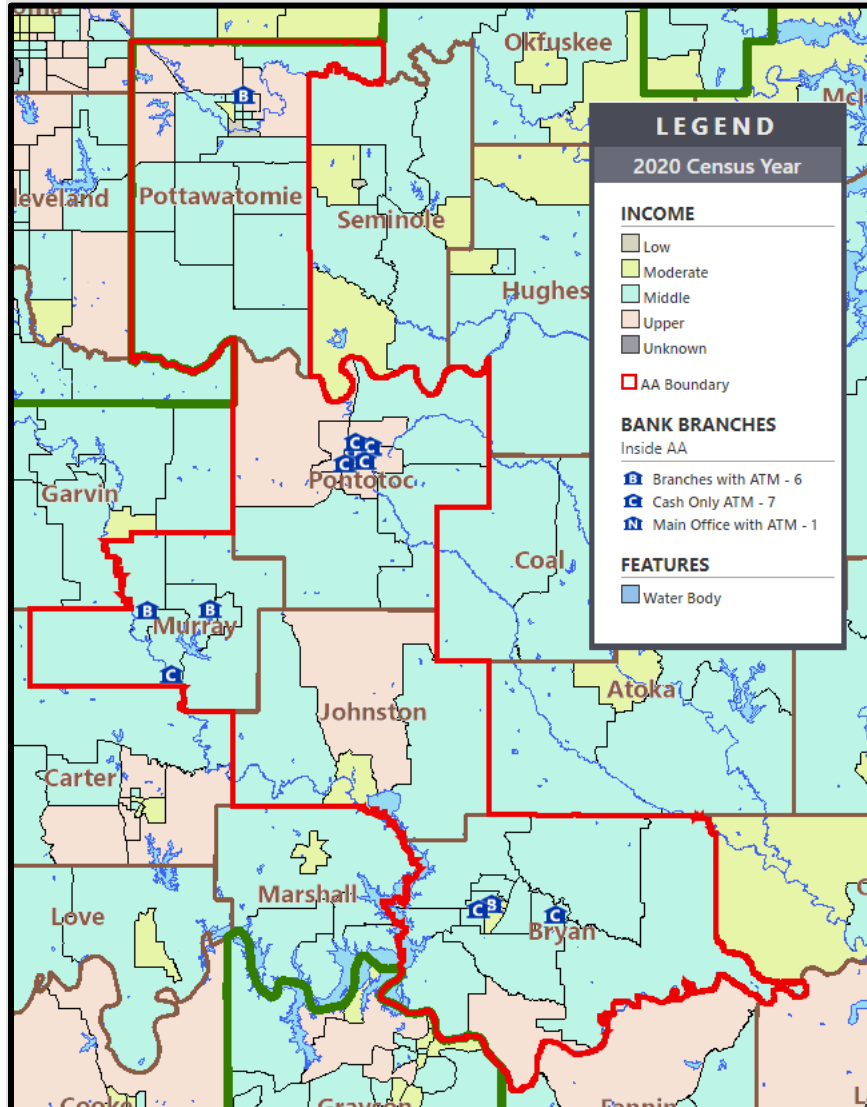
Oklahoma City MSA AA

APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 East Central Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.9	616	1.3	236	38.3	9,069	19.7
Moderate	6	11.3	3,796	8.2	809	21.3	7,607	16.5
Middle	35	66.0	30,140	65.4	3,604	12.0	9,603	20.8
Upper	11	20.8	11,512	25.0	873	7.6	19,785	43.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	53	100.0	46,064	100.0	5,522	12.0	46,064	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,510	334	0.7	22.1	980	64.9	196	13.0
Moderate	8,228	2,987	6.5	36.3	4,055	49.3	1,186	14.4
Middle	51,753	29,792	65.1	57.6	13,466	26.0	8,495	16.4
Upper	17,779	12,627	27.6	71.0	3,213	18.1	1,939	10.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	79,270	45,740	100.0	57.7	21,714	27.4	11,816	14.9

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	218	3.7	191	3.6	23	5.0	4	3.3
Moderate	775	13.1	691	12.9	73	16.0	11	9.1
Middle	3,614	61.0	3,261	61.0	271	59.3	82	67.8
Upper	1,320	22.3	1,206	22.5	90	19.7	24	19.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,927	100.0	5,349	100.0	457	100.0	121	100.0
Percentage of Total Businesses:				90.2		7.7		2.0

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	8	3.0	8	3.0	0	0.0	0	0.0
Middle	195	72.8	193	72.8	2	66.7	0	0.0
Upper	64	23.9	63	23.8	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	268	100.0	265	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-2

2022 East Central Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	1.9	616	1.3	236	38.3	9,069	19.7
Moderate	6	11.3	3,796	8.2	809	21.3	7,607	16.5
Middle	35	66.0	30,140	65.4	3,604	12.0	9,603	20.8
Upper	11	20.8	11,512	25.0	873	7.6	19,785	43.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	53	100.0	46,064	100.0	5,522	12.0	46,064	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,510	334	0.7	22.1	980	64.9	196	13.0
Moderate	8,228	2,987	6.5	36.3	4,055	49.3	1,186	14.4
Middle	51,753	29,792	65.1	57.6	13,466	26.0	8,495	16.4
Upper	17,779	12,627	27.6	71.0	3,213	18.1	1,939	10.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	79,270	45,740	100.0	57.7	21,714	27.4	11,816	14.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	222	3.6	196	3.5	22	4.7	4	3.2
Moderate	805	12.9	721	12.7	73	15.7	11	8.8
Middle	3,813	61.0	3,453	61.0	276	59.4	84	67.2
Upper	1,407	22.5	1,287	22.8	94	20.2	26	20.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,247	100.0	5,657	100.0	465	100.0	125	100.0
Percentage of Total Businesses:				90.6		7.4		2.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	7	2.5	7	2.5	0	0.0	0	0.0
Middle	206	73.0	204	73.1	2	66.7	0	0.0
Upper	68	24.1	67	24.0	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	282	100.0	279	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.9		1.1		0.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-3

2023 Oklahoma City MSA AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1	
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6	
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5	
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8	
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0	
Total AA	419	100.0	337,178	100.0	32,087	9.5	337,178	100.0	

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	578,343	336,847	100.0	58.2	186,307	32.2	55,189	9.5

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,642	4.6	2,295	4.4	313	7.0	34	4.7
Moderate	12,599	21.8	11,278	21.4	1,168	26.2	153	21.3
Middle	20,225	34.9	18,510	35.1	1,485	33.3	230	32.0
Upper	20,794	35.9	19,191	36.4	1,322	29.6	281	39.1
Unknown	1,647	2.8	1,453	2.8	173	3.9	21	2.9
Total AA	57,907	100.0	52,727	100.0	4,461	100.0	719	100.0
Percentage of Total Businesses:			91.1		7.7			1.2

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	2.1	19	1.9	3	13.6	0	0.0
Moderate	123	11.9	119	11.8	3	13.6	1	100.0
Middle	443	43.0	437	43.4	6	27.3	0	0.0
Upper	438	42.5	428	42.5	10	45.5	0	0.0
Unknown	5	0.5	5	0.5	0	0.0	0	0.0
Total AA	1,031	100.0	1,008	100.0	22	100.0	1	100.0
Percentage of Total Farms:			97.8		2.1			0.1

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-4

2022 Oklahoma City MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0
Total AA	419	100.0	337,178	100.0	32,087	9.5	337,178	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	578,343	336,847	100.0	58.2	186,307	32.2	55,189	9.5

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,768	4.4	2,413	4.2	319	6.9	36	4.4
Moderate	13,351	21.5	11,979	21.1	1,209	26.3	163	19.8
Middle	21,779	35.0	19,978	35.2	1,534	33.4	267	32.4
Upper	22,538	36.2	20,852	36.7	1,353	29.4	333	40.4
Unknown	1,800	2.9	1,594	2.8	181	3.9	25	3.0
Total AA	62,236	100.0	56,816	100.0	4,596	100.0	824	100.0
Percentage of Total Businesses:				91.3		7.4		1.3

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	1.9	18	1.6	3	13.0	0	0.0
Moderate	143	12.7	139	12.6	3	13.0	1	100.0
Middle	471	41.8	465	42.2	6	26.1	0	0.0
Upper	485	43.1	474	43.0	11	47.8	0	0.0
Unknown	6	0.5	6	0.5	0	0.0	0	0.0
Total AA	1,126	100.0	1,102	100.0	23	100.0	1	100.0
Percentage of Total Farms:				97.9		2.0		0.1

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – GLOSSARY

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 metropolitan area/assessment area.

Census tract: 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.

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