



PUBLIC DISCLOSURE

March 23, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Oklahoma Capital Bank
RSSD# 284154

8080 S Yale Avenue
Tulsa, Oklahoma 74136

Federal Reserve Bank of Kansas City

1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating 2
Scope of Examination 2
Description of Institution 2
Description of Assessment Area 3
Conclusions With Respect to Performance Criteria 5
Fair Lending or Other Illegal Credit Practices Review 8
Appendix A – Demographic Information..... 9
Appendix B – Glossary 10

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Oklahoma Capital Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's loan-to-deposit ratio (LTD) is more than reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a poor distribution among 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.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, aggregate lending data, and credit needs. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 16-quarter average LTD ratio.
- A statistical sample of 55 small business loans selected from a universe of 75 loans originated between January 1, 2024 and December 31, 2024.
- All components of the lending test were weighted evenly.

DESCRIPTION OF INSTITUTION

Oklahoma Capital Bank is a community bank headquartered in South Tulsa, Oklahoma. The bank's characteristics include the following.

- The bank is a wholly-owned subsidiary of Sooner Southwest Bankshares, Inc.
- The bank has total assets of \$168.3 million as of 9/30/2025.
- In addition to its main office in South Tulsa, the bank has two additional offices located in Tulsa and Skiatook, Oklahoma.
- The bank currently operates two cash-only automated teller machines (ATMs) in the South Tulsa and Skiatook branches.
- As shown in the table below, the bank's primary business focus is commercial lending.

Table 1

Composition of Loan Portfolio as of September 30, 2025		
Loan Type	\$(000)	%
Construction and Land Development	43,771	33.1
Farmland	1,594	1.2
1- to 4-Family Residential Real Estate	19,258	14.6
Multifamily Residential Real Estate	9,431	7.1
Nonfarm Nonresidential Real Estate	35,735	27.1
Agricultural	0	0.0
Commercial and Industrial	21,668	16.4
Consumer	625	0.5
Other	0	0.0
Gross Loans	132,082	100.0

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

The bank was rated Satisfactory under the CRA at its February 7, 2022 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.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Tulsa Metropolitan AA consists of Osage and Tulsa Counties in their entirety. Osage and Tulsa Counties are two of the six counties that make up the Tulsa Metropolitan Statistical Area (MSA).

- The delineated AA remains unchanged since the 2022 examination.
- The AA is comprised of 14 low-, 70 moderate-, 60 middle-, 76 upper-, and 1 unknown-income census tracts. Although the delineated AA remains unchanged, at the previous evaluation the AA was comprised of 17 low-, 55 moderate-, 61 middle-, and 53 upper-income census tracts.
- According to the June 30, 2024 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank has a deposit market share of 0.4 percent which ranked 37th out of 54 FDIC-insured institutions with branch offices operating in the AA.
- To further augment the CRA evaluation, examiners referenced one interview with a member of the community within the bank’s AA that was previously conducted to ascertain the credit needs of the communities, the responsiveness of the area banks in meeting those needs, and the local economic conditions. The community member represented an economic development organization.

Table 2

Population Change			
Assessment Area: Tulsa Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Tulsa Metropolitan	671,389	715,097	6.5
Osage County, OK	48,054	45,818	(4.7)
Tulsa County, OK	623,335	669,279	7.4
Tulsa, OK MSA	962,676	1,015,331	5.5
Oklahoma	3,849,733	3,959,353	2.8

*Source: 2011-2015 U.S. Census Bureau American Community Survey
2020 U.S. Census Bureau Decennial Census*

- While Osage County saw a decline in population from 2015 to 2020, U.S. Census Bureau estimates show population stabilization based on the 2024 population estimates of 45,997.
- According to the U.S. Census Bureau, Tulsa is the most populous city in the AA with an estimated population of 415,154 in 2024, which accounts for 56.1 percent of the AA's total population.

Table 3

Median Family Income Change			
Assessment Area: Tulsa Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Tulsa Metropolitan	67,197	72,402	7.7
Osage County, OK	62,463	62,130	(0.5)
Tulsa County, OK	67,531	73,515	8.9
Tulsa, OK MSA	66,846	72,203	8.0
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
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- The percentage of families living below poverty in Osage County is 10.5 percent compared to 10.9 percent in Tulsa County; both are comparable to the statewide figure of 11.3 percent.

Table 4

Housing Cost Burden						
Assessment Area: Tulsa Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Tulsa Metropolitan	74.9	38.5	39.1	57.0	30.4	16.7
Osage County, OK	62.7	27.6	37.3	44.5	20.1	14.6
Tulsa County, OK	75.5	38.8	39.1	58.4	31.5	16.9
Tulsa, OK MSA	73.0	36.9	38.0	54.2	28.5	16.0
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4

*Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- The median housing value of the AA, at \$158,516, is largely driven by the higher median housing value in Tulsa County at \$160,700. This is higher than the statewide median housing value of \$142,400.
- The community member noted there is a need for affordable housing and cited a housing shortage based on an estimate that 13,000 units will be needed over the next 10 years.

Table 5

Unemployment Rates					
Assessment Area: Tulsa Metropolitan					
Area	2020	2021	2022	2023	2024
Tulsa Metropolitan	6.7	4.2	3.1	3.2	3.3
Osage County, OK	6.8	4.5	3.7	3.7	3.9
Tulsa County, OK	6.7	4.2	3.1	3.2	3.3
Tulsa, OK MSA	6.5	4.1	3.1	3.2	3.3
Oklahoma	6.3	4.0	3.0	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA’s unemployment figures are comparable to the MSA and statewide figures.
- The community member stated the major industries in the area are oil and gas, aerospace, and manufacturing. The community member noted there are new employers entering the area in advanced mobility, drone technology, and a technology hub which will create more employment opportunities within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank’s overall lending test performance is Satisfactory. All components of the lending test were weighted equally.

Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average LTD 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 AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, loan portfolio composition, and area of operations in proximity to the bank’s AA. The bank’s LTD ratio is more than reasonable. The bank’s 16-quarter LTD ratio of 93.2 percent is above the five similarly situated institutions, with ratios ranging from 30.5 percent to 81.9 percent.

Table 6

Comparative LTD Ratios December 31, 2021 – September 30, 2025			
Institution	Location	Asset Size \$(000)	LTD Ratio (%)
			16-Quarter Average
Oklahoma Capital Bank	Tulsa, Oklahoma	168,256	93.2
Similarly Situated Institutions			
First National Bank & Trust Company of Broken Arrow	Broken Arrow, Oklahoma	263,547	72.1
City National Bank & Trust Company	Lawton, Oklahoma	442,932	81.9
Exchange Bank	Skiatook, Oklahoma	154,271	41.1
Spiro State Bank	Spiro, Oklahoma	102,061	30.5
American Bank & Trust Company	Tulsa, Oklahoma	335,170	60.6

Assessment Area Concentration

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

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Small Business	37	67.3	3,528	64.2	18	32.7	1,967	35.8
Total Loans	37	67.3	3,528	64.2	18	32.7	1,967	35.8

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 AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of small business lending in low-income census tracts was below aggregate lending data and below the demographic figure. However, the demographic figure, which represents the percentage of businesses operating in these census tracts by income level of geography, at 4.9 percent, signifies the limited number of businesses available to lend to in these areas, and therefore limited opportunity for the bank to lend in these census tracts. The distribution of small business lending in moderate-income census tracts was slightly below the demographic figure. For additional performance context, aggregate lending data for moderate-income census tracts was referenced. While not a direct

comparison to the bank, as the bank is not a CRA reporter, the bank’s lending was comparable to the aggregate lending data, supporting the overall reasonable rating.

Additionally, an analysis of the dispersion of lending among the geographies of different income levels was conducted. Though there were gaps identified within the bank’s small business lending, they did not impact conclusions. Given the size of the bank and the bank’s AA, along with the limited number of branches the bank operates, it is reasonable that they would not be able to serve all low- and moderate-income (LMI) tracts within the AA.

Table 8

Distribution of 2024 Small Business Lending By Income Level of Geography							
Assessment Area: Tulsa Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	0	0.0	3.6	0	0.0	5.6	4.9
Moderate	8	21.6	23.0	616	17.5	28.0	27.3
Middle	8	21.6	27.8	841	23.8	27.6	31.5
Upper	21	56.8	45.0	2,071	58.7	38.6	36.2
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.6	0	0.0	0.1	
Total	37	100.0	100.0	3,528	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Lending to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to businesses of different sizes. The bank’s lending has a poor distribution among businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is poor. The distribution of small business lending to businesses with annual revenues of one million dollars or less was below aggregate lending data and below the demographic figure, which represents the total percentage of businesses in the AA with revenues of one million dollars or less.

Examiners reviewed the composition of the bank’s small business loan sample and identified that 32 out of 37 loans were made to businesses with revenues greater than one million dollars. Historically, the bank has maintained a significant percentage of its business lending activity through ongoing transactions with a few businesses that have revenue greater than one million dollars.

Table 9

Distribution of 2024 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Tulsa Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
By Revenue							
\$1 Million or Less	5	13.5	51.4	1,443	40.9	34.5	90.6
Over \$1 Million	32	86.5		2,085	59.1		8.5
Revenue Unknown	0	0.0		0	0.0		0.9
Total	37	100.0		3,528	100.0		100.0
By Loan Size							
\$100,000 or Less	30	81.1	92.6	1,038	29.4	35.2	
\$100,001 - \$250,000	2	5.4	3.7	322	9.1	15.4	
\$250,001 - \$1 Million	5	13.5	3.7	2,168	61.5	49.4	
Total	37	100.0	100.0	3,528	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	2	40.0		52	3.6		
\$100,001 - \$250,000	0	0.0		0	0.0		
\$250,001 - \$1 Million	3	60.0		1,390	96.4		
Total	5	100.0		1,442	100.0		
<i>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016 - 2020 U.S. Census Bureau: American Community Survey</i>							

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.

APPENDIX A – DEMOGRAPHIC INFORMATION

Table A-1

2024 Tulsa Metropolitan Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	14	6.3	10,082	5.9	4,091	40.6	37,581	21.8
Moderate	70	31.7	48,860	28.4	8,835	18.1	30,171	17.5
Middle	60	27.1	48,800	28.3	3,475	7.1	32,617	18.9
Upper	76	34.4	64,270	37.3	2,286	3.6	71,778	41.7
Unknown	1	0.5	135	0.1	26	19.3	0	0.0
Total AA	221	100.0	172,147	100.0	18,713	10.9	172,147	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,701	6,170	3.7	29.8	11,546	55.8	2,985	14.4
Moderate	97,488	39,200	23.7	40.2	44,271	45.4	14,017	14.4
Middle	88,817	49,918	30.2	56.2	29,105	32.8	9,794	11.0
Upper	98,071	69,892	42.3	71.3	21,271	21.7	6,908	7.0
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
Total AA	306,262	165,284	100.0	54.0	106,989	34.9	33,989	11.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,605	4.9	1,383	4.6	212	7.6	10	3.6
Moderate	8,978	27.3	7,947	26.7	961	34.3	70	24.9
Middle	10,346	31.5	9,320	31.3	917	32.7	109	38.8
Upper	11,891	36.2	11,097	37.3	703	25.1	91	32.4
Unknown	53	0.2	43	0.1	9	0.3	1	0.4
Total AA	32,873	100.0	29,790	100.0	2,802	100.0	281	100.0
Percentage of Total Businesses:			90.6		8.5		0.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	9	2.8	9	2.8	0	0.0	0	0.0
Moderate	54	16.7	53	16.7	1	20.0	0	0.0
Middle	129	39.8	128	40.4	1	20.0	0	0.0
Upper	132	40.7	127	40.1	3	60.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	324	100.0	317	100.0	5	100.0	2	100.0
Percentage of Total Farms:			97.8		1.5		0.6	
<p>Source: 2024 FFIEC Census Data 2016 - 2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>								

APPENDIX B – 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.