PUBLIC DISCLOSURE

May 19, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Grant County Bank
RSSD# 361354

120 South Main Street
Medford, Oklahoma 73759

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.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Grant County 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 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 an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and farms 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 only AA**.** Examiners reviewed the following data:

- The bank's 15-quarter average LTD ratio.
- The universe of 46 small farm loans originated from May 17, 2022, through December 31, 2024.
- A statistical sample of 47 motor vehicle loans from a universe of 61 loans originated from May 17, 2022, through December 31, 2024.
- The loan products received equal weight in the evaluation.

DESCRIPTION OF INSTITUTION

Grant County Bank is a community bank headquartered in Medford, Oklahoma. The bank's characteristics include the following.

- The bank has total assets of $54.4 million as of September 30, 2025.
- The bank operates out of a single, full-service location in Medford, Oklahoma, and does not have any automated teller machines.
- As shown in the table below, the bank's primary business focus is agricultural and commercial lending.

Table 1

Composition of Loan Portfolio as of September 30, 2025		
Loan Type	**$(000)**	**%**
Farmland	1,825	16.6
1- to 4-Family Residential Real Estate	85	0.8
Nonfarm Nonresidential Real Estate	1,477	13.4
Agricultural	4,977	45.2
Commercial and Industrial	764	6.9
Consumer	1,848	16.8
Other	30	0.3
Gross Loans	11,006	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its May 16, 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 Grant County AA consists of Grant County, Oklahoma, in its entirety (see Appendix A for additional demographic data).

- There have been no changes to the AA delineation since the prior exam.
- The AA includes one middle- and one upper-income census tracts. The census tract composition has changed since the last evaluation due to updated American Community Survey (ACS) data. The AA previously consisted of two middle-income census tracts.
- According to the June 30, 2024, FDIC Deposit Market Share Report, the bank had an 18.6 percent market share among all FDIC-insured institutions operating in the AA, which ranked second out of five institutions.
- Two previously conducted interviews with members of the community were leveraged to gain insight into local economic conditions and credit needs of the community. One community member is a member of a local government within the AA. The other community member represents a community action agency.

Table 2

Population Change Assessment Area: Grant County			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Grant County	4,517	4,169	(7.7)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
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			

- The AA experienced a population decrease of 7.7 percent, which is higher than the 3.3 percent decrease experienced in other rural Oklahoma areas. In contrast, the statewide population grew 2.8 percent.
- In addition to being the location of the bank, the largest population center within the AA is Medford, with 932 residents in 2020.
- A community member noted the area has suffered from an outflow of residents and population decline due to the dearth of high-paying opportunities.

Table 3

Median Family Income Change Assessment Area: Grant County			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Grant County	66,300	71,313	7.6
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
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

- According to the 2020 ACS data, the AA is comprised of 33.2 percent LMI families, which is lower than the figure for other rural Oklahoma counties and the statewide figures of 39.4 and 39.1 percent, respectively.
- In 2020, 5.8 percent of families were below the poverty level, which is lower than the figure for other rural Oklahoma counties and the statewide figure of 13.5 and 11.3 percent, respectively.

Table 4

Housing Cost Burden Assessment Area: Grant County						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Grant County	67.5	5.7	16.6	30.8	2.0	8.2
NonMSA Oklahoma	66.5	30.6	35.0	48.2	22.2	14.9
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 2020 median housing value in the AA was $78,941, which is below the value of $110,370 for other rural Oklahoma areas and the statewide value of $142,400.
- The portion of owner-occupied units in the AA is 54.6 percent, which is comparable to the figure for other rural Oklahoma areas at 55.3 percent, and the statewide figure of 56.7 percent.
- A community member noted the area needs affordable housing, and lower interest rates for home purchases, to sustain an acceptable population.

Table 5

Unemployment Rates Assessment Area: Grant County					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Grant County	4.2	3.3	2.4	2.6	2.6
NonMSA Oklahoma	6.2	4.1	3.3	3.4	3.5
Oklahoma	6.3	4.0	3.0	3.2	3.3
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As indicated in Table 5, the unemployment rate in the AA has decreased since 2020 and trended downward similar to other rural Oklahoma figures year-over-year.
- According to the U.S. Census Bureau, major industries in the AA include educational services, healthcare and social assistance, transportation and warehousing, utilities, agriculture, forestry, fishing and hunting, and mining.
- According to the U.S. Census Bureau, the most common job groups in the AA are office and administrative support, management, and production occupations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall lending test performance is Satisfactory. In determining the lending test rating, equal weight was given to each of the performance criteria. When evaluating the bank's loan performance, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is more representative of the number of individuals and entities served.

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. Similarly situated institutions were selected based on asset size, product offerings, market share, and location.

The bank's LTD ratio is reasonable. While the bank's LTD ratio is below the ratios of the similarly situated institutions, it is considered reasonable given performance context. The bank obtains a large portion of its deposits from public entities which it is unable to lend against. The bank has the highest percentage of public funds as a portion of total deposits out of the similarly situated institutions. The bank also has a large volume of pledged securities which limits its ability to lend. The bank's percentage of pledged securities to total securities was the second highest of the similarly situated institutions.

Table 6

Comparative LTD Ratios March 31, 2022 – September 30, 2025			
Institution	**Location**	**Asset Size $(000)**	**LTD Ratio (%) 15 Quarter Average**
Grant County Bank	**Medford, OK**	**54,436**	**29.6**
Similarly Situated Institutions			
Security State Bank	Wellington, KS	56,731	39.4
Cleo State Bank	Cleo Springs, OK	113,077	54.8
Johnson State Bank	Johnson, KS	89,195	39.9
ACB Bank	Cherokee, OK	142,559	88.3
Oklahoma State Bank	Buffalo, OK	63,185	72.2

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**			
	#	**#%**	**$(000)**	**$%**	**#**	**#%**	**$(000)**	**$%**
Motor Vehicle	26	55.3	363	42.6	21	44.7	490	57.4
Small Farm	37	80.4	2,731	72.1	9	19.6	1,056	27.9
TOTAL LOANS	**63**	**67.7**	**3,094**	**66.7**	**30**	**32.3**	**1,546**	**33.3**
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.

<u>Small Farm Lending</u>

The geographic distribution of small farm lending is reasonable. The distribution of small farm lending in the middle-income census tract was below aggregate lending data and below the demographic figure, which represents the percentage of farms operating in these census tracts by income level of geography. The distribution of small farm lending in the upper-income census tract was comparable to aggregate lending data and above the demographic figure. An analysis of the dispersion of small farm loans revealed no conspicuous gaps or lapses in lending throughout the AA.

Table 8

Distribution of 2022 to 2024 Small Farm Lending By Income Level of Geography Assessment Area: Grant County							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	2.7	13.1	38	1.4	19.0	30.2
Upper	36	97.3	86.9	2,692	98.6	81.0	69.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	2,731	100.0	100.0	100.0

Source: 2022 - 2024 FFIEC Census Data
2022 - 2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

<u>Motor Vehicle Lending</u>

The geographic distribution of motor vehicle lending is reasonable. The distribution of motor vehicle lending in the middle-income census tract was below the demographic figure, which represents the percentage of households by income level of census tracts. The distribution of motor vehicle lending in the upper-income census tract was above the demographic figure. An analysis of the dispersion of motor vehicle loans revealed no conspicuous gaps or lapses in lending throughout the AA**.**

Table 9

Distribution of 2022 to 2024 Motor Vehicle Lending By Income Level of Geography Assessment Area: Grant County					
Geographic Income Level	Bank Loans				Households %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	1	3.8	9	2.5	33.3
Upper	25	96.2	353	97.2	66.7
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	26	100.0	363	100.0	100.0

Source: 2022 - 2024 FFIEC Census 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 Farms of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and farms of different sizes. The bank's lending has an excellent distribution among individuals of different income levels and farms of different sizes.

Small Farm Lending

The borrower distribution of small farm lending is excellent. The distribution of lending to farms with annual revenues of one million dollars or less was above aggregate lending data and comparable to the demographic figure, which represents the total percentage of farms in the AA with revenues of one million dollars or less. Additionally, 100.0 percent of the bank's loans to farms with annual revenue of one million dollars or less were in amounts of $250,000 or less, which demonstrates the bank's willingness to originate loans in lower amounts that are typically requested by smaller farm entities.

Table 10

Distribution of 2022 to 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Grant County							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	33	89.2	48.5	2,144	78.5	73.0	100.0
Over $1 Million	2	5.4		500	18.3		0.0
Revenue Unknown	2	5.4		87	3.2		0.0
Total	37	100.0		2,731	100.0		100.0
By Loan Size							
$100,000 or Less	26	70.3	87.8	889	32.6	40.2	
$100,001 - $250,000	10	27.0	8.3	1,542	56.5	30.1	
$250,001 - $500,000	1	2.7	3.9	300	11.0	29.6	
Total	37	100.0	100.0	2,731	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	24	72.7		801	37.4		
$100,001 - $250,000	9	27.3		1,342	62.6		
$250,001 - $500,000	0	0.0		0	0.0		
Total	33	100.0		2,143	100.0		

Source: 2022 - 2024 FFIEC Census Data
2022 - 2024 Dun & Bradstreet Data
2016 - 2020 U.S. Census Bureau: American Community Survey

Motor Vehicle Lending

The borrower distribution of motor vehicle lending is excellent. The distribution of motor vehicle lending to low-income borrowers was comparable to the demographic figure, which represents the percentage of households by household income. The distribution of motor vehicle lending to moderate-income borrowers was above the demographic figure. The distribution of motor vehicle lending to LMI borrowers was 53.8 percent, which is above the percentage of total LMI households.

Table 11

Distribution of 2022 to 2024 Motor Vehicle Lending By Borrower Income Level Assessment Area: Grant County					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	$(000)	$%	
Low	5	19.2	97	26.7	18.9
Moderate	9	34.6	111	30.6	11.9
Middle	7	26.9	78	21.5	20.7
Upper	5	19.2	78	21.5	48.5
Unknown	0	0.0	0	0.0	0.0
Total	26	100.0	363	100.0	100.0

Source: 2022 - 2024 FFIEC Census Data
2016 - 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent 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.

APPENDIX A – DEMOGRAPHIC INFORMATION
Table A-1

2024 Grant County Demographics											
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income				
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	151	13.7			
Moderate	0	0.0	0	0.0	0	0.0	216	19.5			
Middle	1	50.0	396	35.8	25	6.3	181	16.4			
Upper	1	50.0	709	64.2	39	5.5	557	50.4			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	**2**	**100.0**	**1,105**	**100.0**	**64**	**5.8**	**1,105**	**100.0**			
	Housing Units by Tract	Housing Type by Tract									
		Owner-occupied			Rental		Vacant				
		#	% by tract	% by unit	#	% by unit	#	% by unit			
Low	0	0	0.0	0.0	0	0.0	0	0.0			
Moderate	0	0	0.0	0.0	0	0.0	0	0.0			
Middle	789	437	32.3	55.4	150	19.0	202	25.6			
Upper	1,684	914	67.7	54.3	260	15.4	510	30.3			
Unknown	0	0	0.0	0.0	0	0.0	0	0.0			
Total AA	**2,473**	**1,351**	**100.0**	**54.6**	**410**	**16.6**	**712**	**28.8**			
	Total Businesses by Tract		Businesses by Tract & Revenue Size								
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported				
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate	0	0.0	0	0.0	0	0.0	0	0.0			
Middle	76	37.1	65	38.5	7	31.8	4	28.6			
Upper	129	62.9	104	61.5	15	68.2	10	71.4			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	**205**	**100.0**	**169**	**100.0**	**22**	**100.0**	**14**	**100.0**			
Percentage of Total Businesses:				**82.4**		**10.7**		**6.8**			
	Total Farms by Tract		Farms by Tract & Revenue Size								
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported				
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate	0	0.0	0	0.0	0	0.0	0	0.0			
Middle	16	30.8	16	30.8	0	0.0	0	0.0			
Upper	36	69.2	36	69.2	0	0.0	0	0.0			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	**52**	**100.0**	**52**	**100.0**	**0**	**0.0**	**0**	**0.0**			
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**			

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.

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.