



PUBLIC DISCLOSURE

July 28, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mabrey Bank
RSSD# 139553

14821 South Memorial Drive
Bixby, Oklahoma 74008

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 institution. 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

This institution is rated: **Satisfactory**

The following table indicates the performance level of Mabrey Bank (the bank) with respect to the lending, investment, and service tests.

| Performance Levels | Performance Tests | | |
|---------------------------|--------------------------|------------------------|---------------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | | X |
| High Satisfactory | | X | |
| Low Satisfactory | X | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |

** The lending test is weighted more heavily than the investment and service tests in determining the overall rating.*

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A high percentage of the bank's loans are originated within its delineated AAs.
- The bank's distribution of loans by income level of geography (geographic distribution) is adequate.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes (borrower distribution) is adequate.
- The bank makes an adequate level of community development (CD) loans.

Investment Test

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to credit and CD needs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

INSTITUTION**DESCRIPTION OF INSTITUTION**

The bank is an interstate financial institution headquartered in Bixby, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Mabrey Bancorporation, Inc.
- The bank has total assets of \$1.9 billion as of March 31, 2025.
- As of December 31, 2024, the bank operates 14 full-service banking facilities and one limited-service branch throughout its three delineated AAs in Oklahoma. These are the Tulsa Metropolitan AA, the Oklahoma City Metropolitan AA, and the Eastern Oklahoma Nonmetropolitan AA.
- All but two branches have cash-dispensing automated teller machines (ATMs) onsite, as well as five stand-alone ATMs in the Tulsa Metropolitan AA.
- As shown in the table below, the bank's primary business focus is commercial lending followed by residential real estate lending.
- There has been no merger or acquisition activity since the prior evaluation.

Table 1

| Composition of Loan Portfolio as of March 31, 2025 | | |
|--|------------------|--------------|
| Loan Type | \$ (000) | % |
| Construction and Land Development | 102,786 | 7.6 |
| Farmland | 46,433 | 3.4 |
| 1- to 4-Family Residential Real Estate | 370,677 | 27.5 |
| Multifamily Residential Real Estate | 32,195 | 2.4 |
| Nonfarm Nonresidential Real Estate | 463,741 | 34.4 |
| Agricultural | 11,683 | 0.9 |
| Commercial and Industrial | 283,408 | 21.0 |
| Consumer | 23,595 | 1.7 |
| Other | 14,476 | 1.1 |
| Gross Loans | 1,348,994 | 100.0 |

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

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its June 12, 2023 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.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large 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. Performance was assessed within the bank's three AAs. The Tulsa Metropolitan and Eastern Oklahoma Nonmetropolitan AAs were assessed using a full-scope review. The Oklahoma City Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2023 and 2024 CRA LARs;
- CD loans originated from January 1, 2023 to December 31, 2024.
- Qualified investments that were made from January 1, 2023 to December 31, 2024, qualified investments made prior to but still outstanding during this period, and qualified grants and donations made during this period; and,
- Retail banking services and CD services from January 1, 2023 to December 31, 2024.

Small business lending carried more weight in the analysis based on the higher volumes of loans by both number and dollar volume compared to the bank's home mortgage lending. Small farm lending performance carried the least weight in the conclusion of performance based on having lower lending volumes in comparison to the other two products.

In addition, more emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is an indicator of credit demand and numbers of individuals served within the AA. Lending was also compared to demographic data to understand the level of available credit opportunities present throughout the bank's AAs.

CRA aggregate lending data for 2023 was the most recent publicly available data for small business and small farm lending at the time of the evaluation. As a result, the bank's 2023 small business and small farm lending performance is discussed in detail within the applicable sections that follow. The discussion of the bank's small business and small farm lending performance for 2024 was limited but provided support to the overall rating during the evaluation period.

Table 2 illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2024 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

Table 2

| Assessment Area | Review Type | Br. # | Review Type and Market Share by AA | | | | Deposit Market Share | |
|----------------------------|-------------|-----------|--|--------------|---|---------------|-----------------------------|--------------------------------|
| | | | Percent of Bank's Lending by \$ ¹ | | Percent of Bank's Deposits by \$ ² | | % Market Share ² | Market Share Rank ³ |
| | | | Bank | State | Bank | State | | |
| State of Oklahoma | | 15 | 100.0 | 100.0 | 100.00 | 100.00 | 2.0 | 7 of 94 |
| Tulsa Metropolitan | Full | 10 | 69.7 | 69.7 | 85.1 | 85.1 | 4.2 | 4 of 55 |
| Oklahoma City Metropolitan | Limited | 1 | 6.1 | 6.1 | 5.2 | 5.2 | 0.2 | 42 of 59 |
| Eastern Oklahoma | Full | 4 | 24.2 | 24.2 | 9.7 | 9.7 | 6.4 | 6 of 15 |

^{1.} Based on the bank's HMDA, small business, and small farm lending used in the analysis.
^{2.} Based on the June 30, 2024 FDIC's Deposit Market Share Report.
^{3.} Based on the bank's ranking among FDIC-insured financial institutions in each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Tulsa Metropolitan AA and the Eastern Oklahoma Nonmetropolitan AA. Lending data for the Oklahoma City Metropolitan AA that received a limited-scope review is located in Appendix E.

LENDING TEST

The bank's overall lending test performance is low satisfactory. The lending test performance for the Tulsa Metropolitan AA is rated adequate, while the Eastern Oklahoma Nonmetropolitan AA is rated good.

In both of the AAs subject to full-scope reviews, the volume of individual HMDA loan products, such as home improvement or multifamily loans, was too low to render a meaningful analysis; thus, in some instances, these loan products are only discussed as part of the total HMDA lending for the geographic and borrower distribution analyses.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect adequate responsiveness to AA credit needs. Table 3 provides a detailed summary of the loan products and volumes evaluated during the review period.

Table 3

| Loan Type | Summary of Lending Activity Reviewed | | | |
|--------------------------|--------------------------------------|----------------|--------------|--------------|
| | # | \$(000) | #% | \$% |
| Home Purchase | 317 | 102,925 | -- | -- |
| Home Improvement | 34 | 2,577 | -- | -- |
| Multifamily Housing | 20 | 26,042 | -- | -- |
| Other Purpose Closed-End | 24 | 2,816 | -- | -- |
| Refinancing | 73 | 19,562 | -- | -- |
| Total HMDA Loans | 468 | 153,922 | 29.0 | 44.0 |
| Small Business Loans | 855 | 175,948 | 53.0 | 50.0 |
| Small Farms Loans | 288 | 23,719 | 18.0 | 7.0 |
| Total Loans | 1,611 | 353,589 | 100.0 | 100.0 |

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including to LMI borrowers. For this evaluation, the bank did not provide any lending that was considered innovative; however, the bank participated in a few industry-recognized government guaranteed lending programs, displaying flexibility in the way the bank serves its communities. The bank offers flexible programs throughout all of its AAs.

The bank provides additional support for small business borrowers by participating in the Small Business Administration's (SBA) 7(a) and Express Loan Programs, which promote business growth and job creation. The SBA 7(a) Loan Program is the SBA's primary program designed to provide start-up and existing small businesses with increased access to capital through more flexible terms than conventional commercial financing. The loan proceeds can then be used for business acquisition and expansion, equipment and commercial real estate purchases, working capital, or to refinance debt. The Express Loan Program is a small dollar loan program that can be set up either as a term loan or line of credit that offers fixed or variable loan rates as well as an easier loan application process, quicker approval times, more flexible terms, and lower downpayment requirements than conventional commercial loans. This loan program is ideal for businesses with less established credit and/or start-up businesses and can be secured or unsecured. During the evaluation period, the bank originated one SBA 7(a) loan for \$546,979.81 and one Express Loan for \$255,000.

The bank also participates in a government guaranteed loan program administered by the Bureau of Indian Affairs. The loan program helps American Indian and Alaska Native tribes and individuals overcome barriers to conventional financing and to secure reasonable interest rates, while also reducing the risk to lenders by providing financial backing from the federal government. Loans under the program may be used for a variety of purposes, including operating capital, equipment purchases, acquisition and financing, building, construction, and lines of credit but must benefit the economy of a reservation or tribal service area. During the evaluation period, the bank originated one loan totaling \$4.5 million (MM) through this program.

Assessment Area Concentration

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

Table 4

| Loan Type | Lending Inside and Outside the Assessment Areas | | | | | | | |
|------------------------------|---|-------------|----------------|-------------|------------|-------------|---------------|-------------|
| | Inside | | Outside | | | | | |
| # | #% | \$(000) | \$% | # | #% | \$(000) | \$% | |
| Home Improvement | 29 | 85.3 | 2,017 | 78.3 | 5 | 14.7 | 560 | 21.7 |
| Home Purchase - Conventional | 232 | 78.6 | 54,390 | 55.6 | 63 | 21.4 | 43,413 | 44.4 |
| Home Purchase - FHA | 17 | 85.0 | 3,793 | 86.1 | 3 | 15.0 | 613 | 13.9 |
| Home Purchase - VA | 2 | 100.0 | 716 | 100.0 | 0 | 0.0 | 0 | 0.0 |
| Multi-Family Housing | 17 | 85.0 | 22,545 | 86.6 | 3 | 15.0 | 3,497 | 13.4 |
| Other Purpose Closed-End | 20 | 83.3 | 1,919 | 68.1 | 4 | 16.7 | 897 | 31.9 |
| Refinancing | 65 | 89.0 | 12,306 | 62.9 | 8 | 11.0 | 7,256 | 37.1 |
| Total HMDA related | 382 | 81.6 | 97,686 | 63.5 | 86 | 18.4 | 56,236 | 36.5 |
| Small Business | 731 | 85.5 | 146,683 | 83.4 | 124 | 14.5 | 29,265 | 16.6 |
| Small Farm | 247 | 85.8 | 19,041 | 80.3 | 41 | 14.2 | 4,678 | 19.7 |
| TOTAL LOANS | 1,360 | 84.4 | 263,410 | 74.5 | 251 | 15.6 | 90,179 | 25.5 |

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

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank's AAs.

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 adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion is primarily derived from an adequate level of penetration noted in the Tulsa Metropolitan AA, which has a majority of the lending activity. The Eastern Oklahoma Nonmetropolitan AA was rated as having a good geographic distribution.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses and farms of different sizes. This conclusion is primarily derived from an adequate level of penetration noted in the Tulsa Metropolitan AA and the Eastern Oklahoma Nonmetropolitan AA.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank makes an adequate level of CD loans when considering the bank's capacity, AA needs, and the availability of lending opportunities. This conclusion is consistent with the individual ratings for CD lending in the Tulsa Metropolitan AA and Eastern Oklahoma Nonmetropolitan AA.

The Tulsa Metropolitan AA had the highest dollar volume of CD loan activity during the review period, with 62.8 percent of the bank-wide CD loans by dollar. By number volume, the Eastern Oklahoma Nonmetropolitan AA had 42.1 percent of the bank-wide CD loans.

The bank originated one loan to a school district outside of the bank's AAs, but within the state of Oklahoma, for the purpose of making improvements to various buildings in the district; in Table 5, this loan is included with the other Community Service loans. A majority of the students in this school district are eligible for the free and reduced lunch program. Table 5 illustrates the volume of CD loans by number and dollar volume based on CD purpose. Additional details of specific CD performance results are further discussed in the analysis of each AA evaluation.

Table 5

| Community Development Loans – All | | |
|-----------------------------------|-----------|---------------|
| Community Development Purpose | # | \$(000) |
| Affordable Housing | 5 | 7,761 |
| Community Services | 10 | 14,573 |
| Economic Development | 1 | 1,612 |
| Revitalization and Stabilization | 3 | 150 |
| Outside Activities | 0 | 0 |
| Total Loans | 19 | 24,095 |

INVESTMENT TEST

This performance criterion evaluates the bank's level of qualified grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of community development.

The bank's overall performance under the investment test is high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AAs. The rating was derived primarily from an excellent level of investments in the Eastern Oklahoma Nonmetropolitan AA, and an adequate level of investments in the Tulsa Metropolitan AA. There were also a number of investments the bank made in the form of bonds for funding the construction and/or renovation of buildings for various school districts in Oklahoma

and neighboring states. In Table 6, the five outside activities show the investments made outside the state of Oklahoma, while the investments made outside of the AAs but within the state of Oklahoma, are included in the Community Service section. Of all the investment activity, 75.0 percent of the activities occurred outside of the bank's AAs. The bank's overall investment activity increased from the last evaluation where the bank had 7 prior period investments totaling \$1.4MM and 20 current investments totaling \$10.6MM.

In addition to qualified investments within the bank's AAs, the bank made a number of qualified CD donations. Overall, 80.9 percent of the donations by number were made in the Tulsa Metropolitan AA, 10.3 percent in the Eastern Oklahoma Nonmetropolitan AA, and 8.8 percent in the Oklahoma City Metropolitan AA.

Table 6

| Investments, Grants, and Donations – All | | | | | | | | |
|--|---------------------------------------|--------------|----------------------------------|---------------|-----------|------------|------------|---------------|
| Community Development Purpose | Prior Period Investments ¹ | | Current Investments ² | | Donations | | Total | |
| | # | \$(000) | # | \$(000) | # | \$(000) | # | \$(000) |
| Affordable Housing | 0 | 0 | 0 | 0 | 3 | 12 | 3 | 12 |
| Community Services | 11 | 4,110 | 52 | 18,105 | 65 | 144 | 128 | 22,358 |
| Economic Development | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Revitalization and Stabilization | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Outside Activities | 5 | 2,799 | 0 | 0 | 0 | 0 | 5 | 2,799 |
| Total | 16 | 6,909 | 52 | 18,105 | 68 | 156 | 136 | 25,169 |

¹. Book Value of Investment
². Original Market Value of Investment

SERVICE TEST

The bank's overall performance under the service test is outstanding. The rating is derived from excellent service test conclusions in the Tulsa Metropolitan AA and Eastern Oklahoma Nonmetropolitan AA.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the 15 total branch offices included in this evaluation, three offices were located in low-, three in moderate-, four in middle-, and five in upper-income census tracts. All branch locations except two have onsite cash-dispensing ATMs. There are also five stand-alone cash-dispensing ATMs in the Tulsa

Metropolitan AA. Bank office and ATM locations generally align with the total percentage of census tracts by income level throughout its AAs.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the last evaluation, the bank closed the ATM at the Oklahoma City branch.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours are consistent across the various AAs with general hours being from 9 a.m. to 4 p.m. Monday through Friday, with drive-through facilities being open an hour earlier and staying open an hour later. Saturday hours are generally from 9 a.m. to 12 p.m.

Table 7

| Retail Banking and Community Development Services – All | | | | | | | | | | | | |
|---|-----------------------------------|--------------------|------|----------------------|--------------------------------|-------|--|---------------------|------|------|-------|-------|
| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk | Total |
| | 20.0 | 20.0 | 26.7 | 33.3 | 0.0 | 100.0 | 7.9 | 30.5 | 30.5 | 28.2 | 2.9 | 100.0 |
| Changes in Branch Location | Location of ATMs by Tract (%) | | | | | | Percent of Households by Tracts ¹ (%) | | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk | Total |
| | 16.7 | 27.8 | 27.8 | 27.8 | 0.0 | 100.0 | 7.1 | 30.7 | 32.5 | 28.8 | 0.9 | 100.0 |
| Community Development Services | Number of Branches (#) | | | | | | Net Change in Branch Locations (#) | | | | | |
| | Total Branches | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk | Total | |
| | | 15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Community Development Services | Affordable Housing | Community Services | | Economic Development | Revitalization & Stabilization | | Total Services | Total Organizations | | | | |
| | 6 | 117 | | 16 | 1 | | 140 | 39 | | | | |

¹. Based on 2024 FFIEC census tract definitions.

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank is a leader in providing CD services. The bank officers and staff provided 140 qualified services to 39 different organizations. Services provided include serving on boards of directors of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, economic development organizations that primarily focus on attracting and retaining small businesses, and local organizations that serve to revitalize and stabilize distressed and/or underserved areas. Other staff serve on committees that provide technical assistance and advice on financial matters. A substantial portion of CD services was performed in the Tulsa Metropolitan AA, which accounted for 72.1 percent of the CD services bank-wide. Service totals for the Eastern Oklahoma Nonmetropolitan AA accounted for 20.0 percent, while the Oklahoma City Metropolitan AA made up 6.4 percent. The remainder of the activities occurred in the overall state of Oklahoma.

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.

**TULSA METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE TULSA METROPOLITAN AA

The bank's Tulsa Metropolitan AA consists of Tulsa, Okmulgee and Wagoner counties in their entirety. This AA comprises a portion of the larger Tulsa, Oklahoma Metropolitan Statistical Area (Tulsa MSA). Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- In March of 2024, the bank removed Creek County from the delineated AA. The bank previously took 13 of the 23 census tracts in this county.
- As of the 2024 FFIEC Census data, the AA is comprised of 244 census tracts, including 15 low-, 73 moderate-, 71 middle-, 84 upper-, and 1 unknown-income census tract(s). The census tract designations represent a change from the prior exam where the tract composition consisted of 257 census tracts, of which 15 were low-, 76 were moderate-, 78 were middle-, 87 were upper-, and 1 was an unknown-income census tract(s). These changes were updated with the 2024 FFIEC census data.
- The bank operates 10 of its 15 banking offices in this AA. This includes the bank's main office in Bixby, a limited-service branch (drive-through only) in Okmulgee, and eight full-service branches. All branch locations except one full-service branch in Okmulgee maintain cash-only ATMs. Additionally, the bank operates five stand-alone ATMs throughout the AA.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank had a 4.2 percent market share of total deposits within the AA, ranking 4th of 55 FDIC-insured financial institutions operating 220 banking offices in the AA.
- To further augment the evaluation, two community contacts recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The two individuals were both from economic development organizations.

Table 8

| Population Change Assessment Area: Tulsa Metropolitan | | | |
|--|-----------------|-----------------|----------------|
| Area | 2015 Population | 2020 Population | Percent Change |
| Tulsa Metropolitan | 738,172 | 786,966 | 6.6 |
| Okmulgee County, OK | 39,446 | 36,706 | (6.9) |
| Tulsa County, OK | 623,335 | 669,279 | 7.4 |
| Wagoner County, OK | 75,391 | 80,981 | 7.4 |
| Tulsa, OK MSA | 962,676 | 1,015,331 | 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's population comprises approximately 77.5 percent of the larger Tulsa Oklahoma MSA's population.
- Population growth outpaced the state of Oklahoma from 2015-2020, except in Okmulgee County, where there was a population decline.
- One community contact noted that Tulsa has a low cost of living and has seen a steady migration of people from higher cost west coast areas that can work remotely in recent years.
- Another contact noted that with the growth in Tulsa, there are more opportunities for businesses to locate there, which promotes economic vitality and mobility and allows Tulsa to promote opportunities not available in more saturated markets.

Table 9

| Median Family Income Change Assessment Area: Tulsa Metropolitan | | | |
|--|---------------------------|---------------------------|----------------|
| Area | 2015 Median Family Income | 2020 Median Family Income | Percent Change |
| Tulsa Metropolitan | 67,068 | 73,099 | 9.0 |
| Okmulgee County, OK | 53,473 | 57,161 | 6.9 |
| Tulsa County, OK | 67,531 | 73,515 | 8.9 |
| Wagoner County, OK | 70,042 | 79,407 | 13.4 |
| 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
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- Changes in median family income (MFI) reflected positive growth throughout all of the AA counties. The highest growth rates in the AA occurred in Wagoner and Tulsa Counties, although these two counties also had the highest MFI by dollar amount.

- Based on the 2020 American Community Survey (ACS) data, the portion of AA families living below the poverty level was 10.7 percent, which was similar to the Tulsa MSA at 10.4 percent and below the state of Oklahoma at 11.3 percent. Families living below the poverty level in the AA counties ranged from a low of 7.1 percent in Wagoner County to a high of 14.5 percent in Okmulgee County.

Table 10

| 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 | 75.2 | 38.0 | 38.9 | 56.7 | 30.9 | 16.4 |
| Okmulgee County, OK | 67.8 | 31.2 | 36.2 | 49.5 | 24.5 | 15.5 |
| Tulsa County, OK | 75.5 | 38.8 | 39.1 | 58.4 | 31.5 | 16.9 |
| Wagoner County, OK | 75.7 | 29.2 | 37.2 | 48.2 | 30.4 | 13.6 |
| 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 |

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

- The AA cost burden for both LMI renters and homeowners was generally consistent with figures for the state of Oklahoma, with the greatest burden among low-income renters when compared to low-income homeowners.
- The median housing value in the AA counties ranged from \$85,900 in Okmulgee County to a high of \$162,900 in Wagoner County, compared to \$158,043 for the AA and \$142,400 for the state of Oklahoma.
- The median age of housing stock in the AA is 46 years of age. When broken down by the income level of census tract, the median age is 59 years in low-, 56 in moderate-, 46 in middle-, and 36 years in upper-income census tracts. The older age of homes in LMI census tracts suggest more dilapidated homes in need of repair.
- A community contact noted that there is a shortage of housing for both affordable and market rate units.

Table 11

| Area | Unemployment Rates | | | | |
|---------------------|--------------------|------|------|------|------|
| | 2019 | 2020 | 2021 | 2022 | 2023 |
| Tulsa Metropolitan | 3.1 | 6.7 | 4.2 | 3.1 | 3.2 |
| Okmulgee County, OK | 4.7 | 7.5 | 5.4 | 4.2 | 4.2 |
| Tulsa County, OK | 3.0 | 6.7 | 4.2 | 3.1 | 3.2 |
| Wagoner County, OK | 3.0 | 5.9 | 3.7 | 3.0 | 3.2 |
| Tulsa, OK MSA | 3.1 | 6.6 | 4.2 | 3.1 | 3.2 |
| Oklahoma | 3.1 | 6.3 | 4.0 | 3.1 | 3.2 |

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA were aligned with the figures for Oklahoma between 2019 and 2023, with the exception of Okmulgee County. As illustrated in Table 11, unemployment rates increased in 2020 throughout all the geographic areas due to the onset of the Coronavirus Disease 2019 Pandemic (pandemic) before decreasing in 2022 to levels consistent with the pre-pandemic rates.
- A community contact noted the major industries in the area are oil and gas, aerospace, and manufacturing. They also noted that no major employers had left the area but that new ones had entered such as those in advanced mobility, drone technology resulting from a federal grant, and the creation of a technology hub.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Tulsa Metropolitan AA is adequate. Overall, the bank's lending activity responsiveness is adequate, and the geographic distribution of loans and borrower distribution of loans among individuals of different income levels and businesses and farms of different revenue sizes is also adequate. Furthermore, the bank makes an adequate level of CD loans in the AA.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in this AA included 519 small business, 141 small farm, and 288 home mortgage loans originated between January 1, 2023 and December 31, 2024.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending

that was considered particularly innovative; however, the bank participated in a few government-guaranteed lending programs, as noted previously in the overall Institution section, demonstrating flexibility in the way the bank services its communities. A description of the bank's flexible lending products is also discussed in the overall Institution description.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects an adequate distribution among the different census tracts and dispersion throughout the AA. The geographic distribution for small business and small farm loans is adequate, while the distribution of home mortgage loans is good. Home improvement and multifamily loans for 2024 as well as home refinance, home improvement and multifamily loans for 2023 were not evaluated at the individual product level based on lending levels that were too low to conduct a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The distribution of 2024 home mortgage loans among low-income census tracts was significantly above aggregate by number and dollar and the demographic figure, which represents the percentage of owner-occupied housing units in each census tract. Lending in moderate-income census tracts was comparable to aggregate by number and dollar and the demographic figure.

The geographic distribution of home mortgage lending in 2023 was above the 2024 lending patterns.

An analysis of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion based on the limited levels of home mortgage lending relative to the number of census tracts in the AA.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The bank's 2024 home purchase lending in low-income census tracts was significantly above aggregate lenders by number and dollar, as well as the demographic figure. Lending among moderate-income census tracts was comparable to aggregate by number and dollar and the demographic figure. When combining LMI together, the distribution was significantly above aggregate by number, above by dollar and above the demographic figure, leading to the excellent rating.

The geographic distribution of home mortgage lending in 2023 was consistent with 2024 lending patterns.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2024 home refinance lending in low-income census tracts was significantly above aggregate lending data by number and dollar and the demographic figure. Lending among moderate-income census tracts was below aggregate lending by number and dollar as well as the demographic figure.

Lending volumes in 2023 were too low to conduct a meaningful analysis.

Table 12

**Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Tulsa Metropolitan**

| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | | Owner Occupied Units % | |
|----------------------------------|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-------|------------------------|--|
| | 2023 | | | | | | 2024 | | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | Agg | Bank | | Agg | | |
| | # | # % | # % | \$ (000) | \$ % | \$ % | # | # % | # % | \$ (000) | \$ % | \$ % | | |
| Home Purchase Loans | | | | | | | | | | | | | | |
| Low | 15 | 14.0 | 2.3 | 1,322 | 5.6 | 1.1 | 13 | 15.5 | 2.6 | 993 | 4.9 | 1.3 | 3.6 | |
| Moderate | 29 | 27.1 | 21.0 | 3,824 | 16.2 | 14.1 | 17 | 20.2 | 19.4 | 2,470 | 12.2 | 12.1 | 22.4 | |
| Middle | 36 | 33.6 | 30.2 | 7,762 | 33.0 | 26.4 | 23 | 27.4 | 29.5 | 5,229 | 25.7 | 23.3 | 31.5 | |
| Upper | 27 | 25.2 | 46.5 | 10,632 | 45.2 | 58.3 | 30 | 35.7 | 48.4 | 11,528 | 56.8 | 63.3 | 42.5 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 1 | 1.2 | 0.1 | 88 | 0.4 | 0.1 | 0.1 | |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | | |
| Total | 107 | 100.0 | 100.0 | 23,540 | 100.0 | 100.0 | 84 | 100.0 | 100.0 | 20,308 | 100.0 | 100.0 | 100.0 | |
| Refinance Loans | | | | | | | | | | | | | | |
| Low | 3 | 13.6 | 2.0 | 61 | 1.4 | 1.1 | 4 | 13.3 | 2.2 | 951 | 14.4 | 1.5 | 3.6 | |
| Moderate | 4 | 18.2 | 21.2 | 1,017 | 23.3 | 14.6 | 3 | 10.0 | 20.9 | 611 | 9.2 | 14.1 | 22.4 | |
| Middle | 10 | 45.5 | 34.5 | 1,324 | 30.4 | 31.7 | 18 | 60.0 | 32.2 | 3,205 | 48.5 | 29.3 | 31.5 | |
| Upper | 5 | 22.7 | 42.4 | 1,958 | 44.9 | 52.6 | 5 | 16.7 | 44.7 | 1,840 | 27.8 | 55.0 | 42.5 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.1 | 0 | 0.0 | 0.1 | 0.1 | |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | | |
| Total | 22 | 100.0 | 100.0 | 4,360 | 100.0 | 100.0 | 30 | 100.0 | 100.0 | 6,607 | 100.0 | 100.0 | 100.0 | |
| Home Improvement Loans | | | | | | | | | | | | | | |
| Low | 2 | 16.7 | 1.9 | 39 | 4.5 | 16 | 2 | 25.0 | 2.2 | 75 | 15.8 | 2.0 | 3.6 | |
| Moderate | 5 | 41.7 | 18.6 | 350 | 40.4 | 15.8 | 2 | 25.0 | 17.0 | 53 | 11.2 | 12.9 | 22.4 | |
| Middle | 2 | 16.7 | 29.6 | 92 | 10.6 | 25.5 | 1 | 12.5 | 26.5 | 83 | 17.5 | 22.8 | 31.5 | |
| Upper | 3 | 25.0 | 49.9 | 385 | 44.5 | 57.0 | 3 | 37.5 | 54.3 | 264 | 55.6 | 62.4 | 42.5 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0.1 | |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | | |
| Total | 12 | 100.0 | 100.0 | 866 | 100.0 | 100.0 | 8 | 100.0 | 100.0 | 475 | 100.0 | 100.0 | 100.0 | |
| Multifamily Loans | | | | | | | | | | | | | | |
| Low | 1 | 12.5 | 11.3 | 200 | 1.6 | 13.3 | 1 | 50.0 | 11.5 | 500 | 20.3 | 5.2 | 12.4 | |
| Moderate | 3 | 37.5 | 36.8 | 1,345 | 11.0 | 20.6 | 0 | 0.0 | 43.7 | 0 | 0.0 | 418 | 37.6 | |
| Middle | 4 | 50.0 | 27.4 | 10,646 | 87.3 | 22.6 | 1 | 50.0 | 23.0 | 1,961 | 79.7 | 18.8 | 27.3 | |
| Upper | 0 | 0.0 | 24.5 | 0 | 0.0 | 43.5 | 0 | 0.0 | 218 | 0 | 0.0 | 34.2 | 214 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 14 | |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | | |
| Total | 8 | 100.0 | 100.0 | 12,191 | 100.0 | 100.0 | 2 | 100.0 | 100.0 | 2,461 | 100.0 | 100.0 | 100.0 | |
| Total Home Mortgage Loans | | | | | | | | | | | | | | |
| Low | 22 | 14.2 | 2.2 | 1,748 | 4.2 | 2.3 | 21 | 15.8 | 2.5 | 2,591 | 8.4 | 1.6 | 3.6 | |
| Moderate | 41 | 26.5 | 20.6 | 6,536 | 15.7 | 14.8 | 22 | 16.5 | 19.2 | 3,134 | 10.2 | 14.5 | 22.4 | |
| Middle | 54 | 34.8 | 30.7 | 19,912 | 47.7 | 26.6 | 47 | 35.3 | 29.6 | 10,881 | 35.3 | 23.7 | 31.5 | |
| Upper | 38 | 24.5 | 46.4 | 13,518 | 32.4 | 56.2 | 42 | 31.6 | 48.7 | 14,135 | 45.8 | 60.2 | 42.5 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 1 | 0.8 | 0.1 | 88 | 0.3 | 0.1 | 0.1 | |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | | |
| Total | 155 | 100.0 | 100.0 | 41,714 | 100.0 | 100.0 | 133 | 100.0 | 100.0 | 30,829 | 100.0 | 100.0 | 100.0 | |

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.

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 adequate. The bank's distribution of small business lending in 2023 among low-income census tracts was significantly above aggregate lending by number, below by dollar, and significantly above the demographic figure, which represents the percentage of total businesses by income level of geography. Lending among moderate-income tracts was comparable to aggregate lending data by both number and dollar and the demographic figure.

The geographic distribution of small business lending in 2024 reflected performance that was consistent with 2023 lending patterns.

The bank's small business loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI census tracts. However, given the number of tracts in the AA, it would be unreasonable to expect the bank to reach every census tract. Additionally, the originations were primarily located in proximity to the bank's branches. Based on these factors, the gaps and lapses did not impact the overall conclusion.

Table 13

| Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography | | | | | | | | | | | | Total Businesses % |
|---|----------------------------------|-------|----------|--------|-------|-------|-----|----------|--------|----------|--------------------|--------------------|
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | Total Businesses % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | Agg | Bank | Agg | | Bank | | Bank | | Bank | | |
| # | #% | #% | \$ (000) | \$ % | \$ % | # | #% | \$ (000) | \$ % | \$ (000) | \$ % | |
| Low | 23 | 9.1 | 3.8 | 2,073 | 3.5 | 5.2 | 25 | 9.4 | 4,511 | 7.9 | 5.0 | |
| Moderate | 51 | 20.1 | 23.1 | 15,379 | 25.9 | 28.5 | 45 | 17.0 | 14,429 | 25.2 | 26.7 | |
| Middle | 74 | 29.1 | 28.8 | 17,585 | 29.6 | 28.2 | 78 | 29.4 | 11,381 | 19.9 | 31.6 | |
| Upper | 104 | 40.9 | 43.6 | 23,723 | 39.9 | 37.8 | 115 | 43.4 | 26,733 | 46.6 | 36.6 | |
| Unknown | 2 | 0.8 | 0.1 | 695 | 1.2 | 0.1 | 2 | 0.8 | 275 | 0.5 | 0.2 | |
| Tract-Unk | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.1 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 254 | 100.0 | 100.0 | 59,455 | 100.0 | 100.0 | 265 | 100.0 | 57,329 | 100.0 | 100.0 | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank's distribution of small farm lending in 2023 among low-income census tracts was significantly above the aggregate lending by number and dollar, as well as the demographic figure, which represents the percentage of total farms by income level of geography. Lending among moderate-income tracts was below aggregate lending data by number, comparable by dollar, and below the demographic figure.

The geographic distribution of small farm lending in 2024 reflected performance that was consistent with 2023 lending patterns.

The bank's small farm loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI census tracts. Similar to small business lending, the AA consists of over 200 census tracts, and it would be unreasonable to expect the bank to lend in every tract. Based on this factor, the gaps and lapses did not impact the overall conclusion.

Table 14

| Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography | | | | | | | | | | | | |
|---|----------------------------------|-------|-----------|-------|-------|-------|----|---------|---------|-------|---------------|--|
| Assessment Area: Tulsa Metropolitan | | | | | | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | Total Farms % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | Agg | Bank | Agg | | Bank | # | #% | \$(000) | \$% | | |
| # | #% | #% | \$\$(000) | \$% | \$% | # | #% | \$(000) | \$% | | | |
| Low | 3 | 4.3 | 1.0 | 178 | 2.7 | 0.9 | 4 | 5.6 | 486 | 7.9 | 2.0 | |
| Moderate | 4 | 5.7 | 11.1 | 281 | 4.2 | 5.7 | 5 | 7.0 | 243 | 3.9 | 14.0 | |
| Middle | 59 | 84.3 | 59.0 | 5,912 | 88.2 | 65.4 | 53 | 74.6 | 4,535 | 73.6 | 43.4 | |
| Upper | 4 | 5.7 | 28.3 | 332 | 5.0 | 27.8 | 9 | 12.7 | 898 | 14.6 | 40.6 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Tract-Unc | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.1 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 70 | 100.0 | 100.0 | 6,703 | 100.0 | 100.0 | 71 | 100.0 | 6,162 | 100.0 | 100.0 | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. Home improvement loans were not evaluated at the individual product level in 2024, while home improvement and home refinance loans were not evaluated at the individual product level in 2023 based on levels that were too low to render a meaningful analysis.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 loans to low-income borrowers was comparable to aggregate lending data by number and dollar and significantly below the demographic figure, which represents the distribution of families in the AA by income level. Lending to moderate-income borrowers was comparable to aggregate by number and dollar and the demographic figure.

The borrower distribution of home mortgage lending in 2023 was consistent with the 2024 lending patterns.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2024 home purchase loans to low-income borrowers was comparable to aggregate by number and dollar, and significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by number and dollar and the demographic figure.

The borrower distribution of home purchase lending in 2023 reflected consistent performance with the 2024 lending levels.

Home Refinance Loans

The borrower distribution of home refinance lending is poor. The distribution of 2024 home refinance loans to low-income borrowers was below aggregate by number and significantly below by dollar as well as significantly below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate by number, below by dollar and below the demographic figure.

Lending levels in 2023 were too low to conduct a meaningful analysis.

Table 15

**Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Tulsa Metropolitan**

| Borrower Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | | Families by Family Income % | |
|----------------------------------|----------------------------------|-------|----------|--------|----------|-------|------|-------|-------|----------|-------|-------|-----------------------------|--|
| | 2023 | | | | | | 2024 | | | | | | | |
| | Bank | | Agg | | Bank | | Agg | | Bank | | Agg | | | |
| # | # % | # % | \$ (000) | \$ % | \$ (000) | \$ % | # | # % | # % | \$ (000) | \$ % | \$ % | | |
| Home Purchase Loans | | | | | | | | | | | | | | |
| Low | 7 | 6.5 | 5.4 | 858 | 3.6 | 2.7 | 3 | 3.6 | 4.1 | 413 | 2.0 | 1.8 | 21.5 | |
| Moderate | 9 | 8.4 | 16.2 | 1,258 | 5.3 | 11.1 | 9 | 10.7 | 16.6 | 1,396 | 6.9 | 10.4 | 17.4 | |
| Middle | 19 | 17.8 | 19.8 | 4,009 | 17.0 | 17.9 | 14 | 16.7 | 20.5 | 3,478 | 17.1 | 16.3 | 19.3 | |
| Upper | 33 | 30.8 | 31.9 | 12,847 | 54.6 | 42.6 | 27 | 32.1 | 30.3 | 10,144 | 50.0 | 36.1 | 41.9 | |
| Unknown | 39 | 36.4 | 26.7 | 4,568 | 19.4 | 25.8 | 31 | 36.9 | 28.5 | 4,877 | 24.0 | 35.3 | 0.0 | |
| Total | 107 | 100.0 | 100.0 | 23,540 | 100.0 | 100.0 | 84 | 100.0 | 100.0 | 20,308 | 100.0 | 100.0 | 100.0 | |
| Refinance Loans | | | | | | | | | | | | | | |
| Low | 4 | 18.2 | 8.0 | 186 | 4.3 | 4.0 | 1 | 3.3 | 5.6 | 26 | 0.4 | 2.6 | 21.5 | |
| Moderate | 2 | 9.1 | 17.1 | 327 | 7.5 | 11.5 | 3 | 10.0 | 14.4 | 229 | 3.5 | 9.6 | 17.4 | |
| Middle | 3 | 13.6 | 19.6 | 346 | 7.9 | 16.7 | 2 | 6.7 | 17.7 | 170 | 2.6 | 13.2 | 19.3 | |
| Upper | 4 | 18.2 | 33.0 | 967 | 22.2 | 41.7 | 12 | 40.0 | 31.4 | 3,314 | 50.2 | 37.4 | 41.9 | |
| Unknown | 9 | 40.9 | 22.4 | 2,534 | 58.1 | 26.0 | 12 | 40.0 | 30.8 | 2,868 | 43.4 | 37.3 | 0.0 | |
| Total | 22 | 100.0 | 100.0 | 4,360 | 100.0 | 100.0 | 30 | 100.0 | 100.0 | 6,607 | 100.0 | 100.0 | 100.0 | |
| Home Improvement Loans | | | | | | | | | | | | | | |
| Low | 3 | 25.0 | 5.9 | 61 | 7.0 | 3.2 | 0 | 0.0 | 5.9 | 0 | 0.0 | 3.3 | 21.5 | |
| Moderate | 1 | 8.3 | 16.0 | 70 | 8.1 | 11.6 | 1 | 12.5 | 15.9 | 44 | 9.3 | 9.9 | 17.4 | |
| Middle | 1 | 8.3 | 22.2 | 100 | 11.5 | 17.8 | 2 | 25.0 | 20.7 | 42 | 8.8 | 17.1 | 19.3 | |
| Upper | 1 | 8.3 | 47.9 | 97 | 11.2 | 56.2 | 3 | 37.5 | 48.8 | 275 | 57.9 | 56.8 | 41.9 | |
| Unknown | 6 | 50.0 | 8.0 | 538 | 62.1 | 11.2 | 2 | 25.0 | 8.7 | 114 | 24.0 | 12.9 | 0.0 | |
| Total | 12 | 100.0 | 100.0 | 866 | 100.0 | 100.0 | 8 | 100.0 | 100.0 | 475 | 100.0 | 100.0 | 100.0 | |
| Total Home Mortgage Loans | | | | | | | | | | | | | | |
| Low | 14 | 9.5 | 6.0 | 1,105 | 3.7 | 2.9 | 5 | 3.8 | 4.7 | 533 | 1.9 | 2.0 | 21.5 | |
| Moderate | 14 | 9.5 | 16.3 | 1,743 | 5.9 | 11.2 | 16 | 12.2 | 16.2 | 1,975 | 7.0 | 10.3 | 17.4 | |
| Middle | 23 | 15.6 | 20.0 | 4,455 | 15.1 | 17.7 | 19 | 14.5 | 20.1 | 3,884 | 13.7 | 15.9 | 19.3 | |
| Upper | 42 | 28.6 | 34.3 | 14,580 | 49.4 | 43.2 | 46 | 35.1 | 32.8 | 14,117 | 49.8 | 37.2 | 41.9 | |
| Unknown | 54 | 36.7 | 23.5 | 7,640 | 25.9 | 25.1 | 45 | 34.4 | 26.1 | 7,859 | 27.7 | 34.5 | 0.0 | |
| Total | 147 | 100.0 | 100.0 | 29,523 | 100.0 | 100.0 | 131 | 100.0 | 100.0 | 28,368 | 100.0 | 100.0 | 100.0 | |

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.

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 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 adequate. The bank's 2023 distribution of lending to businesses with revenues of \$1MM or less was comparable to the aggregate lending data by number, significantly below aggregate by dollar and below the demographic figure. The demographic figure represents the percentage of small businesses in the AA based on Dun & Bradstreet (D&B) data.

Additionally, 69.7 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small businesses in the AA.

The distribution of 2024 small business loans was consistent with 2023 lending patterns.

Table 16

| Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses | | | | | | | | | | | | |
|--|----------------------------------|-------|-------|---------|-------|-------|-----|-------|---------|-------|--------------------|--|
| Assessment Area: Tulsa Metropolitan | | | | | | | | | | | | |
| | Bank And Aggregate Loans By Year | | | | | | | | | | Total Businesses % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | Agg | Bank | Agg | | Bank | | | | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | |
| By Revenue | | | | | | | | | | | | |
| \$1 Million or Less | 119 | 46.9 | 54.2 | 6,458 | 10.9 | 35.5 | 142 | 53.6 | 6,801 | 11.9 | 90.9 | |
| Over \$1 Million | 58 | 22.8 | | 10,368 | 17.4 | | 53 | 20.0 | 9,788 | 17.1 | 8.3 | |
| Revenue | 77 | 30.3 | | 42,629 | 71.7 | | 70 | 26.4 | 40,740 | 71.1 | 0.9 | |
| Total | 254 | 100.0 | | 59,455 | 100.0 | | 265 | 100.0 | 57,329 | 100.0 | 100.0 | |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or Less | 119 | 46.9 | 92.3 | 6,458 | 10.9 | 33.0 | 142 | 53.6 | 6,801 | 11.9 | | |
| \$100,001 - \$250,000 | 58 | 22.8 | 3.8 | 10,368 | 17.4 | 15.4 | 53 | 20.0 | 9,788 | 17.1 | | |
| \$250,001 - \$1 Million | 77 | 30.3 | 4.0 | 42,629 | 71.7 | 51.6 | 70 | 26.4 | 40,740 | 71.1 | | |
| Total | 254 | 100.0 | 100.0 | 59,455 | 100.0 | 100.0 | 265 | 100.0 | 57,329 | 100.0 | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or Less | 119 | 100.0 | | 6,458 | 100.0 | | 142 | 100.0 | 6,801 | 100.0 | | |
| \$100,001 - \$250,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| \$250,001 - \$1 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| Total | 119 | 100.0 | | 6,458 | 100.0 | | 142 | 100.0 | 6,801 | 100.0 | | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Small Farm Lending

The borrower distribution of small farm lending is adequate. The bank's 2023 distribution of lending to farms with revenues of \$1MM or less was comparable to aggregate lending by number, below by dollar and comparable to the demographic figure. The demographic figure represents the percentage of small farms in the AA based on D&B data.

Additionally, 90.0 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small farms in the AA.

The distribution of 2024 small farm loans was consistent with 2023 lending patterns.

Table 17

| Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms | | | | | | | | | | | | |
|---|----------------------------------|-------|-------|---------|-------|-------|------|-------|---------|---------------|-------|--|
| Assessment Area: Tulsa Metropolitan | | | | | | | | | | | | |
| | Bank And Aggregate Loans By Year | | | | | | | | | Total Farms % | | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | |
| By Revenue | | | | | | | | | | | | |
| \$1 Million or Less | 49 | 70.0 | 82.4 | 1,935 | 28.9 | 79.1 | 56 | 78.9 | 2,343 | 38.0 | 98.2 | |
| Over \$1 Million | 14 | 20.0 | | 2,143 | 32.0 | | 10 | 14.1 | 1,721 | 27.9 | 1.3 | |
| Revenue | 7 | 10.0 | | 2,625 | 39.2 | | 5 | 7.0 | 2,098 | 34.0 | 0.5 | |
| Total | 70 | 100.0 | | 6,703 | 100.0 | | 71 | 100.0 | 6,162 | 100.0 | 100.0 | |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or Less | 49 | 70.0 | 81.4 | 1,935 | 28.9 | 34.9 | 56 | 78.9 | 2,343 | 38.0 | | |
| \$100,001 - \$250,000 | 14 | 20.0 | 13.0 | 2,143 | 32.0 | 32.2 | 10 | 14.1 | 1,721 | 27.9 | | |
| \$250,001 - \$500,000 | 7 | 10.0 | 5.5 | 2,625 | 39.2 | 32.9 | 5 | 7.0 | 2,098 | 34.0 | | |
| Total | 70 | 100.0 | 100.0 | 6,703 | 100.0 | 100.0 | 71 | 100.0 | 6,162 | 100.0 | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or Less | 49 | 100.0 | | 1,935 | 100.0 | | 56 | 100.0 | 2,343 | 100.0 | | |
| \$100,001 - \$250,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| \$250,001 - \$500,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| Total | 49 | 100.0 | | 1,935 | 100.0 | | 56 | 100.0 | 2,343 | 100.0 | | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated 5 CD loans totaling \$15.1MM in this AA. Examples of the bank's CD lending activities in this AA include:

- Two loans totaling \$13.5MM were originated for the purpose of purchasing furniture, fixtures and expansion of a local health facility in a low-income area that provides services primarily to LMI individuals. The area had also been designated as being medically underserved by the Oklahoma Department of Health.
- A \$1.0MM loan was originated to construct a duplex community that will be used to house those experiencing housing insecurity in the Tulsa area. The organization also provides financial, mental health, and addiction recovery resources.

Table 18

| Community Development Loans – Tulsa Metropolitan AA | | |
|---|----------|---------------|
| Community Development Purpose | # | \$(000) |
| Affordable Housing | 1 | 1,000 |
| Community Services | 4 | 14,135 |
| Economic Development | 0 | 0 |
| Revitalization and Stabilization | 0 | 0 |
| Total Loans | 5 | 15,135 |

INVESTMENT TEST

The bank's performance under the investment test in the Tulsa Metropolitan AA is adequate. The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. Examples of investment activity in the AA include:

- All eight of the investments consisted of bonds that provided funding for improvements to schools in which a majority of students qualified for the free or reduced lunch program. The eight bonds were divided amongst three different school districts.
- One donation for \$17,000 was given to a local organization that primarily serves LMI families and individuals. This organization serves a number of counties in the Tulsa area.
- Two donations totaling \$1,000 were given to a local organization that provides school supplies for teachers to use in their classrooms at local schools that are eligible to receive free and reduced lunch.
- One donation for \$6,000 was for an organization that provides community services for children under the age of 5 when their families are facing financial and personal challenges.

Table 19

| Investments, Grants, and Donations – Tulsa Metropolitan AA | | | | | | | | |
|---|---|---------|--|---------|------------------|---------|--------------|---------|
| Community Development Purpose | Prior Period Investments¹ | | Current Investments² | | Donations | | Total | |
| | # | \$(000) | # | \$(000) | # | \$(000) | # | \$(000) |
| Affordable Housing | 0 | 0 | 0 | 0 | 3 | 12 | 3 | 12 |
| Community Services | 0 | 0 | 8 | 2,010 | 52 | 123 | 60 | 2,133 |
| Economic Development | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Revitalization and Stabilization | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 0 | 8 | 2,010 | 55 | 135 | 63 | 2,145 |

^{1.} Book Value of Investment
^{2.} Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the Tulsa Metropolitan AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates two branches in low-income census tracts, one branch in a moderate-income census tract, three in middle-income census tracts, and four in upper-income census tracts. Branch locations generally align with the total percentage of census tracts in the AA by income level and remain the same as the branch locations noted in the prior evaluation. The bank's ATM network also generally aligns with the percentage of census tracts in the AA by income level. The bank has two ATMs in low-income census tracts, three in moderate-, four in middle-, and five in upper-income census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened and/or closed any branches or ATMs in this AA since the prior CRA evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. A majority of the branches in this AA offer hours from 9:00 a.m. to 4:00 p.m., Monday through Friday, and drive-through hours ranging from 7:30 a.m. to 6:00 p.m. Additionally, Saturday hours are from 9:00 a.m. to 12:00 p.m.

Table 20

| Retail Banking and Community Development Services – Tulsa Metropolitan AA | | | | | | | | | | | |
|---|-----------------------------------|--------------------|----------------------|------|--------------------------------|-------|--|------|---------------------|------|-----|
| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk |
| | 20.0 | 10.0 | 30.0 | 40.0 | 0.0 | 100.0 | 6.1 | 29.9 | 29.1 | 34.4 | 0.4 |
| | Location of ATMs by Tract (%) | | | | | | Percent of Households by Tracts ¹ (%) | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk |
| | 14.3 | 21.4 | 28.6 | 35.7 | 0.0 | 100.0 | 6.4 | 29.1 | 30.4 | 33.8 | 0.3 |
| Changes in Branch Location | Number of Branches (#) | | | | | | Net Change in Branch Locations (#) | | | | |
| | Total Branches | | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk |
| | 10 | | 0 | | 0 | | 0 | 0 | 0 | 0 | 0 |
| Community Development Services | Affordable Housing | Community Services | Economic Development | | Revitalization & Stabilization | | Total Services | | Total Organizations | | |
| | 6 | 84 | 11 | | 0 | | 101 | | 23 | | |

¹. Based on 2024 FFIEC census tract definitions.

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. As noted in the table above, bank employees supported 23 organizations throughout the AA, providing 101 services. Examples of services provided by bank employees include:

- Thirty-nine employees provided fifty-one services to an organization that promotes financial literacy to local schools that participate in the free and reduced lunch program.
- Four bank employees served on the boards of directors (board) of an organization supporting economic development and revitalization of a downtown area by retaining, expanding and recruiting new businesses.
- One employee served on the board and provided financial and technical expertise to an organization that provides affordable housing to LMI seniors.

**OKLAHOMA CITY METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

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

The bank's delineated AA is comprised of Oklahoma County in its entirety. This AA consists of one of seven counties that comprise the Oklahoma City, Oklahoma MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data

- The AA remains unchanged since the prior evaluation.
- The AA is comprised of 266 census tracts, including 26 low-, 85 moderate-, 73 middle-, 67 upper-, and 15 unknown-income census tracts. No changes to the income designations of census tracts have changed since the previous evaluation.
- The AA includes one full-service branch located in Oklahoma City in an upper-income tract, offering drive-through services. The ATM at this location was closed in February 2024. The bank has not opened or closed any branches in this AA since the prior evaluation.
- Based on the 2020 ACS data, the AA population was 796,292. This AA contains roughly 20.1 percent of the overall state population.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank held a 0.2 percent market share of total deposits within the AA, ranking 42nd out of 59 FDIC-insured financial institutions operating from 232 banking offices in the AA.

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

The AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information.

Table 21

| Assessment Area | Lending Test | Investment Test | Service Test |
|-------------------------------|---------------------|------------------------|---------------------|
| Oklahoma City Metropolitan | Consistent | Consistent | Consistent |

**EASTERN OKLAHOMA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE EASTERN OKLAHOMA AA

The bank's Eastern Oklahoma Nonmetropolitan AA consists of Hughes, McIntosh, Muskogee and Okfuskee Counties in their entities. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- In March 2024, the bank changed the AA delineation to include all of Okfuskee County. The bank previously took one of the four census tracts in this county.
- The AA is comprised of 37 census tracts, including 2 low-, 9 moderate-, 23 middle-, and 3-upper income census tracts. This represents a change in census tract composition since the prior evaluation where there was a total of 34 census tracts - 2 low-, 8 moderate-, 21 middle-, and 3 upper-income census tracts. The changes were updated with the 2024 FFIEC Census data.
- According to 2024 FFIEC designations, 3 tracts in Hughes County, 6 tracts in McIntosh County, and 2 tracts in Okfuskee County are all designated as distressed middle-income census tracts.
- The bank operates four branches in this AA, each with an onsite ATM. One branch is located in a low-income census tract, two are located in moderate-income census tracts, and one is located in a middle-income census tract.
- No branch openings or closings occurred in this AA since the prior evaluation.
- As of the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank held a 6.4 percent market share of total deposits within the AA, ranking 6th out of 15 FDIC-insured financial institutions operating from 35 banking offices in the AA.
- To further augment the CRA evaluation, one interview with a community member that was previously conducted in the bank's market was referenced to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the perspective on local economics and demographic characteristics. The community member was from a local government agency.

Table 22

| Population Change Assessment Area: Eastern Oklahoma | | | |
|--|-----------------|-----------------|----------------|
| Area | 2015 Population | 2020 Population | Percent Change |
| Eastern Oklahoma | 116,537 | 109,957 | (5.6) |
| Hughes County, OK | 13,785 | 13,367 | (3.0) |
| McIntosh County, OK | 20,280 | 18,941 | (6.6) |
| Muskogee County, OK | 70,224 | 66,339 | (5.5) |
| Okfuskee County, OK | 12,248 | 11,310 | (7.7) |
| 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 population in the Eastern Oklahoma Nonmetropolitan AA makes up only 2.8 percent of the state of Oklahoma population.
- In the AA, 60.3 percent of residents reside in Muskogee County, while only 10.3 percent reside in Okfuskee County.

Table 23

| Median Family Income Change Assessment Area: Eastern Oklahoma | | | |
|--|---------------------------|---------------------------|----------------|
| Area | 2015 Median Family Income | 2020 Median Family Income | Percent Change |
| Eastern Oklahoma | 52,560 | 52,456 | (0.2) |
| Hughes County, OK | 52,104 | 47,059 | (9.7) |
| McIntosh County, OK | 50,651 | 49,827 | (1.6) |
| Muskogee County, OK | 54,281 | 55,555 | 2.3 |
| Okfuskee County, OK | 49,903 | 47,415 | (5.0) |
| 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.

- The AA's MFI experienced a slight decline from 2015 to 2020, which was primarily driven by a decline in Hughes and Okfuskee Counties. Only Muskogee County experienced an increase in MFI during this time frame.
- Based on the 2020 ACS data, the portion of AA families living below the poverty level was 16.1 percent, which was higher than the non-metropolitan figure of 13.5 percent and the state of Oklahoma at 11.3 percent. Families living below the poverty level in the AA counties ranged from a low of 14.6 in Huges County to a high of 20.5 in Okfuskee County.

Table 24

| Area | Cost Burden – Renters | | | Cost Burden – Owners | | |
|---------------------|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| | Low Income | Moderate Income | All Renters | Low Income | Moderate Income | All Owners |
| Eastern Oklahoma | 66.6 | 27.9 | 37.4 | 43.9 | 22.8 | 15.7 |
| Hughes County, OK | 46.6 | 13.7 | 23.4 | 28.8 | 9.6 | 9.1 |
| McIntosh County, OK | 60.6 | 42.9 | 37.0 | 40.1 | 21.4 | 15.9 |
| Muskogee County, OK | 70.7 | 29.2 | 40.0 | 49.4 | 26.5 | 16.7 |
| Okfuskee County, OK | 60.9 | 15.2 | 31.0 | 43.7 | 15.6 | 16.4 |
| 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 |

Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The cost burden for LMI renters and homeowners was the lowest in Hughes County and highest among low-income renters and homeowners in Muskogee County.
- The median housing value in the AA counties ranged from \$74,200 in Hughes County to a high of \$115,900 in McIntosh County, compared to \$103,991 for the AA and \$142,400 for the state of Oklahoma.
- The median age of housing stock in the AA is 48 years of age. When broken down by the income level of census tracts, the median age is 60 years in low-, 61 years in moderate-, 45 years in middle-, and 42 years in upper-income census tracts. All of the low- and upper-income census tracts in the AA are located in Muskogee County.
- A community contact noted that in Okfuskee County, there is a severe shortage of housing to buy, with the last two housing developments being built in the 1970s.

Table 25

| Area | Unemployment Rates | | | | |
|---------------------|-----------------------------------|-----|-----|-----|-----|
| | Assessment Area: Eastern Oklahoma | | | | |
| Eastern Oklahoma | 4.2 | 6.8 | 5.0 | 3.8 | 4.2 |
| Hughes County, OK | 4.6 | 7.7 | 5.4 | 3.9 | 4.0 |
| McIntosh County, OK | 5.6 | 8.7 | 6.3 | 4.9 | 5.4 |
| Muskogee County, OK | 3.7 | 6.2 | 4.5 | 3.5 | 3.9 |
| Okfuskee County, OK | 4.4 | 6.9 | 5.1 | 4.0 | 4.1 |
| NonMSA Oklahoma | 3.4 | 6.1 | 4.0 | 3.2 | 3.4 |
| Oklahoma | 3.1 | 6.3 | 4.0 | 3.1 | 3.2 |

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates increased in 2020 throughout the geographic areas due to the onset of the pandemic, before declining in 2022 to levels consistent with pre-pandemic rates.
- The primary employment sectors in the AA include Health Care and Social Assistance, Manufacturing, Retail Trade, Educational Assistance and Public Administration.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EASTERN OKLAHOMA AA

LENDING TEST

The bank's performance under the lending test in the Eastern Oklahoma Nonmetropolitan AA is good.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in this AA included 157 small business, 106 small farm and 66 home mortgage loans originated between January 1, 2023 and December 31, 2024.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of various flexible lending programs is discussed in the overall Institution section.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage and small farm loans is good, the distribution of small business loans is adequate. Home refinance, home improvement and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to conduct a meaningful analysis. In addition, home purchase loans for 2023 were not evaluated due to low lending volumes.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank did not have any lending in low-income census tracts in 2024, which was below aggregate lending by number and dollar as well as the demographic figure. The percentage of owner-occupied units in the low-income census tracts was 1.7 percent, which means the opportunities to lend are minimal. Lending in moderate-income census tracts was significantly above aggregate by number, comparable by dollar and significantly above the demographic

figure. When combining the lending to LMI census tracts, the bank's lending was significantly above aggregate by number, comparable by dollar and significantly above the demographic figure.

The geographic distribution of home mortgage lending in 2023 was below the 2024 lending patterns.

An analysis of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion. Three of the moderate-income census tracts with gaps are largely rural, so the opportunity to lend in these tracts is limited. As mentioned above, the low-income census tracts only contain 1.7 percent of owner-occupied homes, so the lending is limited here as well.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. No loans were originated in low-income census tracts, which was below aggregate lenders by number and dollar and below the demographic figure. However, as stated above, the opportunity to lend in these census tracts is very limited. Lending in moderate-income census tracts was significantly above aggregate by number, comparable by dollar and significantly above the demographic figure.

The lending volume for home purchase loans in 2023 was too low to conduct a meaningful analysis.

The evaluation of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion. Similar to total home mortgage lending, three of the moderate-income tracts are largely rural so the opportunity to lend in these tracts is limited. Additionally, the low-income census tracts only contain 1.7 percent of owner-occupied homes, limiting lending opportunities.

Table 26

| Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Eastern Oklahoma | | | | | | | | | | | | | |
|---|----------------------------------|-------|----------|-------|-------|-------|------|-------|-------|----------|-------|---------------------------|-------|
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | Owner Occupied Units % | |
| | 2023 | | | | | | 2024 | | | | | | |
| | Bank | Agg | Bank | Agg | | | Bank | Agg | Bank | Agg | | | |
| # | # % | # % | \$ (000) | \$ % | \$ % | | # | # % | # % | \$ (000) | \$ % | \$ % | |
| Home Purchase Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 10 | 0 | 0.0 | 0.9 | 0 | 0.0 | 15 | 0 | 0.0 | 0.9 | 1.7 |
| Moderate | 2 | 22.2 | 214 | 92 | 6.8 | 17.0 | 11 | 36.7 | 22.1 | 794 | 17.6 | 16.1 | 21.5 |
| Middle | 6 | 66.7 | 64.7 | 1,175 | 86.3 | 67.1 | 19 | 63.3 | 66.2 | 3,723 | 82.4 | 72.2 | 67.6 |
| Upper | 1 | 11.1 | 13.0 | 95 | 7.0 | 15.0 | 0 | 0.0 | 9.9 | 0 | 0.0 | 10.7 | 9.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.1 | 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 | 9 | 100.0 | 100.0 | 1,362 | 100.0 | 100.0 | 30 | 100.0 | 100.0 | 4,517 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.9 | 0 | 0.0 | 1.1 | 1.7 |
| Moderate | 2 | 33.3 | 16.5 | 240 | 43.4 | 12.9 | 2 | 40.0 | 18.6 | 81 | 19.0 | 13.6 | 21.5 |
| Middle | 4 | 66.7 | 66.7 | 313 | 56.6 | 70.4 | 2 | 40.0 | 67.3 | 198 | 46.5 | 72.1 | 67.6 |
| Upper | 0 | 0.0 | 16.5 | 0 | 0.0 | 16.5 | 1 | 20.0 | 13.2 | 147 | 34.5 | 13.2 | 9.2 |
| 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 | 553 | 100.0 | 100.0 | 5 | 100.0 | 100.0 | 426 | 100.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 2.3 | 0 | 0.0 | 2.2 | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.7 | 1.7 |
| Moderate | 2 | 25.0 | 24.6 | 79 | 12.6 | 22.3 | 0 | 0.0 | 24.6 | 0 | 0.0 | 26.1 | 21.5 |
| Middle | 5 | 62.5 | 57.7 | 527 | 84.1 | 54.3 | 1 | 100.0 | 60.9 | 49 | 100.0 | 60.3 | 67.6 |
| Upper | 1 | 12.5 | 15.4 | 21 | 3.3 | 21.2 | 0 | 0.0 | 13.8 | 0 | 0.0 | 12.9 | 9.2 |
| 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 | 8 | 100.0 | 100.0 | 627 | 100.0 | 100.0 | 1 | 100.0 | 100.0 | 49 | 100.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 28.6 | 0 | 0.0 | 33.7 | 8.0 |
| Moderate | 0 | 0.0 | 50.0 | 0 | 0.0 | 66.6 | 0 | 0.0 | 14.3 | 0 | 0.0 | 2.0 | 35.3 |
| Middle | 1 | 100.0 | 50.0 | 148 | 100.0 | 33.4 | 1 | 100.0 | 57.1 | 100 | 100.0 | 64.3 | 49.8 |
| Upper | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 6.9 |
| 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 | 1 | 100.0 | 100.0 | 148 | 100.0 | 100.0 | 1 | 100.0 | 100.0 | 100 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 1.0 | 0 | 0.0 | 0.8 | 0 | 0.0 | 1.4 | 0 | 0.0 | 2.2 | 1.7 |
| Moderate | 6 | 22.2 | 20.4 | 411 | 14.7 | 16.8 | 15 | 38.5 | 21.5 | 955 | 18.5 | 15.2 | 21.5 |
| Middle | 17 | 63.0 | 64.7 | 2,199 | 78.7 | 67.1 | 23 | 59.0 | 66.1 | 4,070 | 78.7 | 71.5 | 67.6 |
| Upper | 4 | 14.8 | 13.9 | 184 | 6.6 | 15.3 | 1 | 2.6 | 10.8 | 147 | 2.8 | 11.0 | 9.2 |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.2 | 0 | 0.0 | 0.1 | 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 | 27 | 100.0 | 100.0 | 2,794 | 100.0 | 100.0 | 39 | 100.0 | 100.0 | 5,172 | 100.0 | 100.0 | 100.0 |

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.

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 adequate. The bank's 2023 small business lending in low-income census tracts was comparable to aggregate lending data by number and dollar, and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to aggregate by number, above by dollar and comparable to the demographic figure.

Lending performance in 2024 was consistent with the 2023 lending patterns.

While gaps or lapses were identified in the dispersion analysis, they did not include LMI census tracts and did not impact the conclusion.

Table 27

| Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography | | | | | | | | | | | | |
|---|----------------------------------|-------|-------|---------|-------|-------|------|-------|---------|-------|--------------------|--|
| Assessment Area: Eastern Oklahoma | | | | | | | | | | | | |
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | Total Businesses % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | |
| Low | 8 | 9.5 | 8.1 | 559 | 10.9 | 10.6 | 7 | 9.6 | 727 | 12.9 | 13.6 | |
| Moderate | 17 | 20.2 | 18.2 | 1,617 | 31.4 | 24.1 | 9 | 12.3 | 379 | 6.7 | 29.0 | |
| Middle | 54 | 64.3 | 60.8 | 2,683 | 52.1 | 55.4 | 54 | 74.0 | 4,355 | 77.5 | 51.4 | |
| Upper | 5 | 6.0 | 10.8 | 292 | 5.7 | 9.0 | 3 | 4.1 | 159 | 2.8 | 6.0 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Tract-Unk | 0 | 0.0 | 2.0 | 0 | 0.0 | 0.8 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 84 | 100.0 | 100.0 | 5,151 | 100.0 | 100.0 | 73 | 100.0 | 5,620 | 100.0 | 100.0 | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Small Farm Lending

The geographic distribution of small farm lending is good. The bank's 2023 small farm lending in low-income census tracts was significantly above aggregate lenders by number and dollar, as well as the demographic figure. In lending to moderate-income census tracts, the bank was comparable to aggregate by number, above by dollar and comparable to the demographic figure.

The lending performance in 2024 was consistent with the 2023 lending patterns.

When evaluating dispersion, gaps or lapses were identified; however, this did not impact the overall conclusion. Limited farming operations were noted where the gaps were identified, so the opportunity to lend in these census tracts was limited.

Table 28

| Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography Assessment Area: Eastern Oklahoma | | | | | | | | | | | | |
|--|----------------------------------|-------|-------|---------|-------|-------|------|-------|---------|-------|------------------|--|
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | Total Farms % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | Bank | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | |
| Low | 3 | 5.8 | 1.6 | 529 | 16.6 | 3.5 | 0 | 0.0 | 0 | 0.0 | 1.4 | |
| Moderate | 12 | 23.1 | 19.2 | 614 | 19.2 | 13.8 | 11 | 20.4 | 516 | 17.3 | 18.0 | |
| Middle | 37 | 71.2 | 75.9 | 2,049 | 64.2 | 79.3 | 43 | 79.6 | 2,468 | 82.7 | 77.0 | |
| Upper | 0 | 0.0 | 3.0 | 0 | 0.0 | 3.3 | 0 | 0.0 | 0 | 0.0 | 3.6 | |
| Unknown | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Tract-Unc | 0 | 0.0 | 0.3 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 52 | 100.0 | 100.0 | 3,192 | 100.0 | 100.0 | 54 | 100.0 | 2,984 | 100.0 | 100.0 | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of home mortgage loans reflects poor performance, while small farm lending reflects adequate performance and small business lending reflects good performance.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The distribution of 2024 loans among low-income borrowers was comparable to aggregate lending data by number and dollar, but significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by both number and dollar, as well as below the demographic figure.

The borrower distribution of 2023 home mortgage lending reflected stronger performance than 2024; however, due to the lower lending volume in 2023, more weight was given to 2024 performance.

Home Purchase Loans

The borrower distribution of home purchase lending is poor. The distribution of 2024 home purchase loans among low-income borrowers was comparable to aggregate data by number and dollar and significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by number and dollar and below the demographic figure.

The lending volume for home purchase loans in 2023 was too low to conduct a meaningful analysis.

Table 29

**Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Eastern Oklahoma**

| Borrower Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | | Families by Family Income % | | | | | | | | | |
|---|----------------------------------|-------|-------|-------|-------|-------|------|-------|-------|-------|-------|-------|-----------------------------|--|--|--|--|--|--|--|--|--|
| | 2023 | | | | | | 2024 | | | | | | | | | | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | Agg | Bank | | Agg | | | | | | | | | | |
| # # % # % \$ (000) \$ % \$ # # % \$ (000) \$ % \$ % | | | | | | | | | | | | | | | | | | | | | | |
| Home Purchase Loans | | | | | | | | | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 4.3 | 0 | 0.0 | 2.1 | 1 | 3.3 | 4.3 | 68 | 1.5 | 2.0 | 25.0 | | | | | | | | | |
| Moderate | 2 | 22.2 | 15.3 | 551 | 40.5 | 10.7 | 2 | 6.7 | 16.3 | 206 | 4.6 | 11.4 | 19.4 | | | | | | | | | |
| Middle | 2 | 22.2 | 20.1 | 235 | 17.3 | 17.0 | 3 | 10.0 | 18.0 | 292 | 6.5 | 15.8 | 20.2 | | | | | | | | | |
| Upper | 2 | 22.2 | 31.9 | 332 | 24.4 | 41.9 | 16 | 53.3 | 32.8 | 2,949 | 65.3 | 42.2 | 35.4 | | | | | | | | | |
| Unknown | 3 | 33.3 | 28.4 | 244 | 17.9 | 28.3 | 8 | 26.7 | 28.6 | 1,002 | 22.2 | 28.6 | 0.0 | | | | | | | | | |
| Total | 9 | 100.0 | 100.0 | 1,362 | 100.0 | 100.0 | 30 | 100.0 | 100.0 | 4,517 | 100.0 | 100.0 | 100.0 | | | | | | | | | |
| Refinance Loans | | | | | | | | | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 3.3 | 0 | 0.0 | 1.6 | 1 | 20.0 | 4.8 | 28 | 6.6 | 2.0 | 25.0 | | | | | | | | | |
| Moderate | 0 | 0.0 | 13.5 | 0 | 0.0 | 7.8 | 0 | 0.0 | 13.0 | 0 | 0.0 | 7.5 | 19.4 | | | | | | | | | |
| Middle | 0 | 0.0 | 20.4 | 0 | 0.0 | 16.2 | 2 | 40.0 | 15.2 | 214 | 50.2 | 11.7 | 20.2 | | | | | | | | | |
| Upper | 4 | 66.7 | 41.7 | 429 | 77.6 | 52.4 | 2 | 40.0 | 37.7 | 184 | 43.2 | 40.1 | 35.4 | | | | | | | | | |
| Unknown | 2 | 33.3 | 21.0 | 124 | 22.4 | 22.0 | 0 | 0.0 | 29.3 | 0 | 0.0 | 38.8 | 0.0 | | | | | | | | | |
| Total | 6 | 100.0 | 100.0 | 553 | 100.0 | 100.0 | 5 | 100.0 | 100.0 | 426 | 100.0 | 100.0 | 100.0 | | | | | | | | | |
| Home Improvement Loans | | | | | | | | | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 6.9 | 0 | 0.0 | 5.2 | 0 | 0.0 | 5.8 | 0 | 0.0 | 4.1 | 25.0 | | | | | | | | | |
| Moderate | 1 | 12.5 | 13.1 | 33 | 5.3 | 9.3 | 0 | 0.0 | 13.8 | 0 | 0.0 | 9.0 | 19.4 | | | | | | | | | |
| Middle | 1 | 12.5 | 22.3 | 31 | 4.9 | 14.1 | 0 | 0.0 | 17.4 | 0 | 0.0 | 12.9 | 20.2 | | | | | | | | | |
| Upper | 5 | 62.5 | 45.4 | 545 | 86.9 | 60.4 | 1 | 100.0 | 47.8 | 49 | 100.0 | 56.2 | 35.4 | | | | | | | | | |
| Unknown | 1 | 12.5 | 12.3 | 18 | 2.9 | 11.0 | 0 | 0.0 | 15.2 | 0 | 0.0 | 17.8 | 0.0 | | | | | | | | | |
| Total | 8 | 100.0 | 100.0 | 627 | 100.0 | 100.0 | 1 | 100.0 | 100.0 | 49 | 100.0 | 100.0 | 100.0 | | | | | | | | | |
| Total Home Mortgage Loans | | | | | | | | | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 4.5 | 0 | 0.0 | 2.2 | 2 | 5.3 | 4.7 | 96 | 1.9 | 2.1 | 25.0 | | | | | | | | | |
| Moderate | 5 | 19.2 | 15.2 | 647 | 24.5 | 10.2 | 3 | 7.9 | 15.5 | 238 | 4.7 | 10.6 | 19.4 | | | | | | | | | |
| Middle | 4 | 15.4 | 20.1 | 307 | 11.6 | 16.7 | 6 | 15.8 | 17.9 | 554 | 10.9 | 15.0 | 20.2 | | | | | | | | | |
| Upper | 11 | 42.3 | 34.9 | 1,306 | 49.4 | 44.4 | 19 | 50.0 | 35.6 | 3,182 | 62.7 | 42.3 | 35.4 | | | | | | | | | |
| Unknown | 6 | 23.1 | 25.4 | 386 | 14.6 | 26.5 | 8 | 21.1 | 26.3 | 1,002 | 19.8 | 30.0 | 0.0 | | | | | | | | | |
| Total | 26 | 100.0 | 100.0 | 2,646 | 100.0 | 100.0 | 38 | 100.0 | 100.0 | 5,072 | 100.0 | 100.0 | 100.0 | | | | | | | | | |

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.

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 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 good. The 2023 distribution of loans to businesses with revenues of \$1MM or less was above aggregate data by number, comparable by dollar and comparable to the demographic figure.

Additionally, 97.6 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small businesses in the AA.

Lending patterns for 2024 were consistent with the 2023 lending performance.

Table 30

| Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses | | | | | | | | | | | |
|---|----------------------------------|-------|------|----------|-------|-------|----|-------|----------|--------------------|--|
| Assessment Area: Eastern Oklahoma | | | | | | | | | | | |
| | Bank And Aggregate Loans By Year | | | | | | | | | Total Businesses % | |
| | 2023 | | | | | 2024* | | | | | |
| | Bank | Agg | Bank | Agg | | Bank | | Bank | | | |
| | # | #% | #% | \$ (000) | \$ % | \$ % | # | #% | \$ (000) | \$ % | |
| By Revenue | | | | | | | | | | | |
| \$1 Million or Less | 75 | 89.3 | 61.7 | 2,791 | 54.2 | 44.9 | 58 | 79.5 | 2,295 | 40.8 | |
| Over \$1 Million Revenue | 7 | 8.3 | 2.4 | 1,088 | 21.1 | 24.7 | 12 | 16.4 | 1,787 | 31.8 | |
| Total | 84 | 100.0 | | 5,151 | 100.0 | | 73 | 100.0 | 5,620 | 100.0 | |
| By Loan Size | | | | | | | | | | | |
| \$100,000 or Less | 75 | 89.3 | 91.9 | 2,791 | 54.2 | 39.2 | 58 | 79.5 | 2,295 | 40.8 | |
| \$100,001 - \$250,000 | 7 | 8.3 | 3.3 | 1,088 | 21.1 | 41.7 | 12 | 16.4 | 1,787 | 31.8 | |
| Total | 84 | 100.0 | | 5,151 | 100.0 | | 73 | 100.0 | 5,620 | 100.0 | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | | | | | |
| \$100,000 or Less | 75 | 100.0 | 0.0 | 2,791 | 100.0 | 0.0 | 58 | 100.0 | 2,295 | 100.0 | |
| \$100,001 - \$250,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | |
| \$250,001 - \$1 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | |
| Total | 75 | 100.0 | | 2,791 | 100.0 | | 58 | 100.0 | 2,295 | 100.0 | |
| Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available. | | | | | | | | | | | |

Small Farm Lending

The borrower distribution of small farm lending is adequate. The 2023 distribution of loans to farms with revenues of \$1MM or less was comparable to aggregate data by number, below by dollar and comparable to the demographic figure.

By loan size, 98.1 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small farms in the AA.

The 2024 performance was consistent with 2023 lending patterns.

Table 31

| Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Eastern Oklahoma | | | | | | | | | | | | |
|--|----------------------------------|-------|-------|---------|-------|-------|------|-------|---------|-------|---------------|--|
| | Bank And Aggregate Loans By Year | | | | | | | | | | Total Farms % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | Bank | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | |
| By Revenue | | | | | | | | | | | | |
| \$1 Million or Less | 44 | 84.6 | 81.4 | 1,501 | 47.0 | 83.0 | 45 | 83.3 | 1,289 | 43.2 | 100.0 | |
| Over \$1 Million Revenue | 7 | 13.5 | | 1,241 | 38.9 | | 7 | 13.0 | 993 | 33.3 | 0.0 | |
| Total | 52 | 100.0 | | 3,192 | 100.0 | | 54 | 100.0 | 2,984 | 100.0 | 100.0 | |
| By Loan Size | | | | | | | | | | | | |
| \$100,000 or Less | 44 | 84.6 | 86.2 | 1,501 | 47.0 | 45.0 | 45 | 83.3 | 1,289 | 43.2 | | |
| \$100,001 - \$250,000 | 7 | 13.5 | 10.8 | 1,241 | 38.9 | 34.1 | 7 | 13.0 | 993 | 33.3 | | |
| \$250,001 - \$500,000 | 1 | 1.9 | 3.0 | 450 | 14.1 | 20.9 | 2 | 3.7 | 702 | 23.5 | | |
| Total | 52 | 100.0 | 100.0 | 3,192 | 100.0 | 100.0 | 54 | 100.0 | 2,984 | 100.0 | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | | | | | | |
| \$100,000 or Less | 44 | 100.0 | | 1,501 | 100.0 | | 45 | 100.0 | 1,289 | 100.0 | | |
| \$100,001 - \$250,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| \$250,001 - \$500,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | |
| Total | 44 | 100.0 | | 1,501 | 100.0 | | 45 | 100.0 | 1,289 | 100.0 | | |
| <p>Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</p> | | | | | | | | | | | | |

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated 8 CD loans totaling \$259,000 in this AA. Examples of the bank's CD lending in this AA include:

- The bank originated five loans totaling approximately \$110,000 to an organization that provides medical transportation services to LMI individuals. These five loans were used to purchase wheelchair/handicap accessible vehicles to help transport the patients.

- One loan for approximately \$90,000 was originated to a local municipality to facilitate the repairs to a water plant. These repairs help maintain access to the water supply and sewer system in a local distressed area.

Table 32

| Community Development Loans – Eastern Oklahoma AA | | |
|---|----------|------------|
| Community Development Purpose | # | \$(000) |
| Affordable Housing | 0 | 0 |
| Community Services | 5 | 109 |
| Economic Development | 0 | 0 |
| Revitalization and Stabilization | 3 | 150 |
| Total Loans | 8 | 259 |

INVESTMENT TEST

The bank's performance under the investment test in the Eastern Oklahoma Nonmetropolitan AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of investment activity in this AA include:

- All seven of the investments consisted of bonds that provided funding for improvements to schools in which a majority of students qualified for the free or reduced lunch program.
- Two donations totaling \$2,000 went to an organization that provides essential needs to children entering the foster care program.
- Two donations totaling \$1,500 went to an organization that helps support education and school curriculum for a local public school district where a majority of the students qualify for the free and reduced lunch program.

Table 33

| Investments, Grants, and Donations – Eastern Oklahoma AA | | | | | | | | |
|--|---------------------------------------|------------|----------------------------------|--------------|-----------|----------|-----------|--------------|
| Community Development Purpose | Prior Period Investments ¹ | | Current Investments ² | | Donations | | Total | |
| | # | \$(000) | # | \$(000) | # | \$(000) | # | \$(000) |
| Affordable Housing | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Community Services | 1 | 750 | 6 | 2,630 | 7 | 8 | 14 | 3,388 |
| Economic Development | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Revitalization and Stabilization | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 1 | 750 | 6 | 2,630 | 7 | 8 | 14 | 3,388 |

¹. Book Value of Investment
². Original Market Value of Investment

SERVICE TEST

The bank's performance under the service test in the Eastern Oklahoma Nonmetropolitan AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates one branch in a low-income census tract, two in moderate-income census tracts, and one in a middle-income census tract. Branch locations generally align with the total percentage of census tracts in the AA by income level of geography and remain the same as the branch locations noted in the prior evaluation. The bank's ATM network also generally aligns with the percentage of census tracts in the AA by income level. The bank has one ATM in a low-income census tract, two in moderate-income census tracts, and one in a middle-income census tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened and/or closed any branches or ATMs in this AA since the prior CRA evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. A majority of the branches in this AA offer hours from 9:00 a.m. to 4:00 p.m. Monday through Friday, and drive-through hours ranging from 7:30 a.m. to 6:00 p.m. Additionally, Saturday hours are from 9:00 a.m. to 12:00 p.m.

Table 34

| Retail Banking and Community Development Services – Eastern Oklahoma AA | | | | | | | | | | | |
|---|-----------------------------------|--------------------|----------------------|-----|--------------------------------|-------|--|------|---------------------|-----|-----|
| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk |
| | 25.0 | 50.0 | 25.0 | 0.0 | 0.0 | 100.0 | 5.4 | 24.3 | 62.2 | 8.1 | 0.0 |
| | Location of ATMs by Tract (%) | | | | | | Percent of Households by Tracts ¹ (%) | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk |
| | 25.0 | 50.0 | 25.0 | 0.0 | 0.0 | 100.0 | 2.7 | 26.3 | 63.2 | 7.8 | 0.0 |
| Changes in Branch Location | Number of Branches (#) | | | | | | Net Change in Branch Locations (#) | | | | |
| | Total Branches | | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk |
| | 4 | | 0 | | 0 | | 0 | 0 | 0 | 0 | 0 |
| Community Development Services | Affordable Housing | Community Services | Economic Development | | Revitalization & Stabilization | | Total Services | | Total Organizations | | |
| | 0 | 24 | 3 | | 1 | | 28 | | 11 | | |

¹. Based on 2024 FFIEC census tract definitions.

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. As noted in the table above, bank employees supported 11 organizations throughout the AA, providing 24 services. Examples of services provided by bank employees include:

- One employee provided two services by serving as president and a board member for an organization that supports education and workforce and economic development to local schools. This employee used technical and financial expertise to approve the financial budget and expenses for the organization. A majority of the schools that are served by this organization qualify for free and reduced lunch.
- An employee served on the board of an organization that provides emergency medical services to communities within a local distressed area.
- Two employees served on the board of a local organization that is primarily involved in economic development.

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

| Scope of Examination | | | |
|---|--|--------------------------|----------------------------|
| <u>Financial Institution</u> | <u>Products/Services Reviewed</u> | | |
| Mabrey Bank Bixby, Oklahoma | <ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business (SB) Loans • Small Farm (SF) Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services | | |
| <u>Time Period</u> | | | |
| <u>HMDA LAR and CRA SB and SF Loans:</u> | January 1, 2023 to December 31, 2024 | | |
| <u>Community Development Activities:</u> | January 1, 2023 to December 31, 2024 | | |
| <u>List of Affiliates Considered in this Evaluation</u> | | | |
| Affiliates | Affiliate Relationship | Products Reviewed | |
| None | None | None | |
| <u>List of Assessment Areas and Type of Examination</u> | | | |
| Assessment Area | Type of Exam | Branches Visited | Community Contacts |
| <u>Oklahoma</u> MSA 46140 Tulsa Metropolitan MSA 36420 Oklahoma City Metropolitan MSA 99999 Eastern Oklahoma | Full Review Limited Review Full Review | None None None | 2 prior None 1 prior |

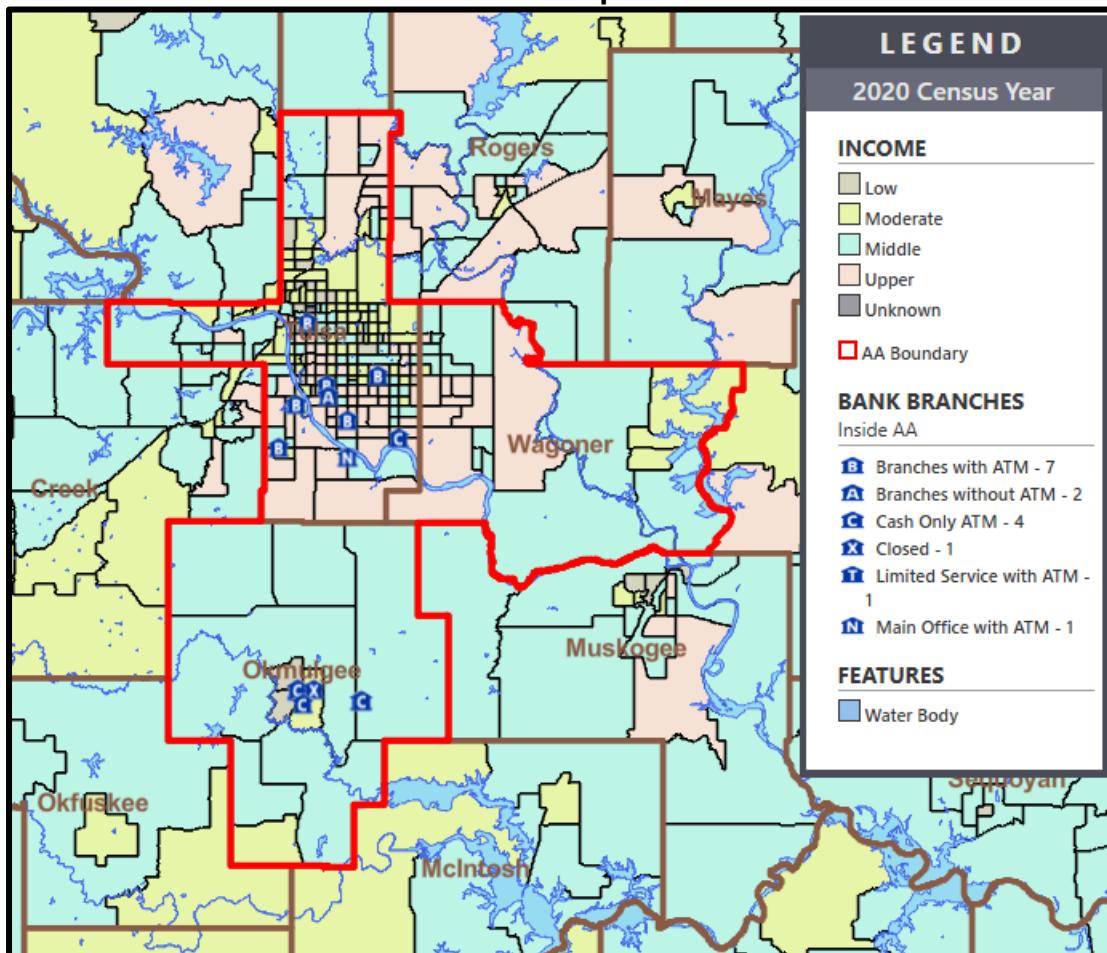
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

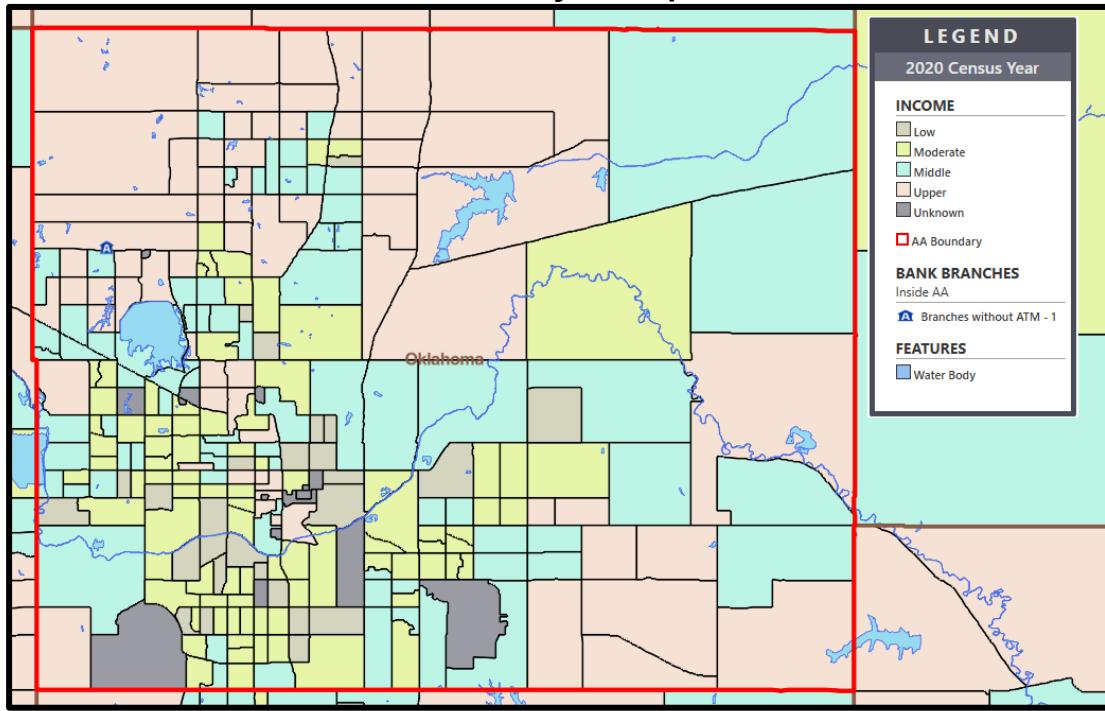
| State or Multistate Metropolitan Area Name | Lending Test Rating | Investment Test Rating | Service Test Rating | Overall Rating |
|---|--------------------------------|-----------------------------------|----------------------------|-----------------------|
| Oklahoma | Low Satisfactory | High Satisfactory | Outstanding | Satisfactory |

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

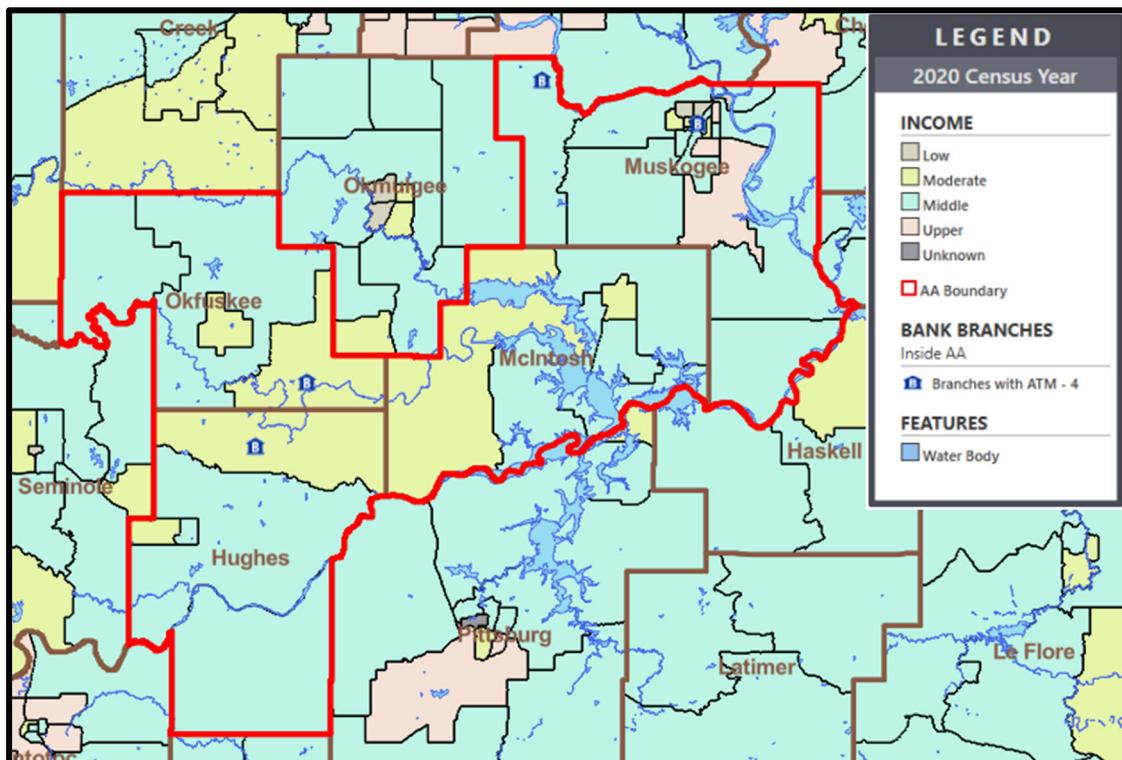
Map C-1
Tulsa Metropolitan



Map C-2
Oklahoma City Metropolitan



Map C-3
Eastern Oklahoma



APPENDIX D – DEMOGRAPHIC INFORMATION

TULSA METROPOLITAN AA

Table D-1

| 2024 Tulsa Metropolitan AA Demographics | | | | | | | | |
|---|------------------------------------|----------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 15 | 6.1 | 10,618 | 5.6 | 4,248 | 40.0 | 40,761 | 21.5 |
| Moderate | 73 | 29.9 | 51,099 | 26.9 | 9,369 | 18.3 | 32,980 | 17.4 |
| Middle | 71 | 29.1 | 56,093 | 29.5 | 4,157 | 7.4 | 36,665 | 19.3 |
| Upper | 84 | 34.4 | 71,956 | 37.9 | 2,436 | 3.4 | 79,495 | 41.9 |
| Unknown | 1 | 0.4 | 135 | 0.1 | 26 | 19.3 | 0 | 0.0 |
| Total AA | 244 | 100.0 | 189,901 | 100.0 | 20,236 | 10.7 | 189,901 | 100.0 |
| Housing Units by Tract | Housing Type by Tract | | | | | | | |
| | Owner-occupied | | | Rental | | Vacant | | |
| | # | % by tract | % by unit | # | % by unit | # | % by unit | |
| Low | 22,505 | 6,579 | 3.6 | 29.2 | 12,362 | 54.9 | 3,564 | 15.8 |
| Moderate | 101,976 | 41,352 | 22.4 | 40.6 | 45,516 | 44.6 | 15,108 | 14.8 |
| Middle | 101,010 | 58,209 | 31.5 | 57.6 | 32,326 | 32.0 | 10,475 | 10.4 |
| Upper | 108,300 | 78,671 | 42.5 | 72.6 | 22,229 | 20.5 | 7,400 | 6.8 |
| Unknown | 1,185 | 104 | 0.1 | 8.8 | 796 | 67.2 | 285 | 24.1 |
| Total AA | 334,976 | 184,915 | 100.0 | 55.2 | 113,229 | 33.8 | 36,832 | 11.0 |
| Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 1,748 | 5.0 | 1,513 | 4.8 | 224 | 7.8 | 11 | 3.7 |
| Moderate | 9,268 | 26.7 | 8,216 | 26.0 | 979 | 34.0 | 73 | 24.4 |
| Middle | 10,974 | 31.6 | 9,928 | 31.4 | 934 | 32.4 | 112 | 37.5 |
| Upper | 12,729 | 36.6 | 11,894 | 37.6 | 733 | 25.5 | 102 | 34.1 |
| Unknown | 53 | 0.2 | 43 | 0.1 | 9 | 0.3 | 1 | 0.3 |
| Total AA | 34,772 | 100.0 | 31,594 | 100.0 | 2,879 | 100.0 | 299 | 100.0 |
| Percentage of Total Businesses: | | | 90.9 | | 8.3 | | 0.9 | |
| Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 8 | 2.0 | 8 | 2.1 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 55 | 14.0 | 54 | 14.0 | 1 | 20.0 | 0 | 0.0 |
| Middle | 170 | 43.4 | 169 | 43.9 | 1 | 20.0 | 0 | 0.0 |
| Upper | 159 | 40.6 | 154 | 40.0 | 3 | 60.0 | 2 | 100.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 392 | 100.0 | 385 | 100.0 | 5 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | 98.2 | | 1.3 | | 0.5 | |
| Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | |

Table D-2

| 2023 Tulsa Metropolitan AA Demographics | | | | | | | | |
|---|------------------------------------|------------|--------------------------|------------------|--|----------------------|---------------------------|-------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 15 | 5.9 | 10,618 | 5.4 | 4,248 | 40.0 | 42,643 | 21.5 |
| Moderate | 76 | 29.8 | 52,746 | 26.6 | 9,532 | 18.1 | 34,539 | 17.4 |
| Middle | 77 | 30.2 | 61,489 | 31.0 | 4,817 | 7.8 | 38,360 | 19.3 |
| Upper | 86 | 33.7 | 73,338 | 37.0 | 2,492 | 3.4 | 82,784 | 41.7 |
| Unknown | 1 | 0.4 | 135 | 0.1 | 26 | 19.3 | 0 | 0.0 |
| Total AA | 255 | 100.0 | 198,326 | 100.0 | 21,115 | 10.6 | 198,326 | 100.0 |
| Housing Units by Tract | Housing Type by Tract | | | | | | | |
| | Owner-occupied | | | Rental | | Vacant | | |
| | # | % by tract | % by unit | # | % by unit | # | % by unit | |
| Low | 22,505 | 6,579 | 3.4 | 29.2 | 12,362 | 54.9 | 3,564 | 15.8 |
| Moderate | 105,006 | 42,954 | 22.2 | 40.9 | 46,491 | 44.3 | 15,561 | 14.8 |
| Middle | 109,661 | 63,887 | 33.0 | 58.3 | 34,350 | 31.3 | 11,424 | 10.4 |
| Upper | 110,101 | 80,091 | 41.4 | 72.7 | 22,469 | 20.4 | 7,541 | 6.8 |
| Unknown | 1,185 | 104 | 0.1 | 8.8 | 796 | 67.2 | 285 | 24.1 |
| Total AA | 348,458 | 193,615 | 100.0 | 55.6 | 116,468 | 33.4 | 38,375 | 11.0 |
| Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 1,796 | 4.4 | 1,552 | 4.2 | 232 | 6.9 | 12 | 3.4 |
| Moderate | 10,513 | 25.7 | 9,313 | 25.0 | 1,116 | 33.1 | 84 | 23.8 |
| Middle | 12,988 | 31.7 | 11,697 | 31.4 | 1,164 | 34.5 | 127 | 36.0 |
| Upper | 15,600 | 38.1 | 14,622 | 39.3 | 849 | 25.2 | 129 | 36.5 |
| Unknown | 52 | 0.1 | 42 | 0.1 | 9 | 0.3 | 1 | 0.3 |
| Total AA | 40,949 | 100.0 | 37,226 | 100.0 | 3,370 | 100.0 | 353 | 100.0 |
| Percentage of Total Businesses: | | | 90.9 | | 8.2 | | 0.9 | |
| Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 6 | 1.3 | 6 | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Moderate | 55 | 11.9 | 54 | 11.9 | 1 | 16.7 | 0 | 0.0 |
| Middle | 194 | 42.0 | 192 | 42.3 | 2 | 33.3 | 0 | 0.0 |
| Upper | 207 | 44.8 | 202 | 44.5 | 3 | 50.0 | 2 | 100.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 462 | 100.0 | 454 | 100.0 | 6 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | 98.3 | | 1.3 | | 0.4 | |
| 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. | | | | | | | | |

EASTERN OKLAHOMA AA

Table D-3

| 2024 Eastern Oklahoma AA Demographics | | | | | | | | | | |
|---|---------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|-------|--|--|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | | | |
| | # | % | # | % | # | % | # | % | | |
| Low | 2 | 5.4 | 566 | 2.0 | 224 | 39.6 | 7,056 | 25.0 | | |
| Moderate | 9 | 24.3 | 7,228 | 25.6 | 1,641 | 22.7 | 5,475 | 19.4 | | |
| Middle | 23 | 62.2 | 17,893 | 63.4 | 2,421 | 13.5 | 5,709 | 20.2 | | |
| Upper | 3 | 8.1 | 2,545 | 9.0 | 263 | 10.3 | 9,992 | 35.4 | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | |
| Total AA | 37 | 100.0 | 28,232 | 100.0 | 4,549 | 16.1 | 28,232 | 100.0 | | |
| | Housing Units by Tract | Housing Type by Tract | | | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | | | |
| Low | 1,529 | 501 | 1.7 | 32.8 | 671 | 43.9 | 357 | 23.3 | | |
| Moderate | 14,673 | 6,370 | 21.5 | 43.4 | 4,905 | 33.4 | 3,398 | 23.2 | | |
| Middle | 36,523 | 20,048 | 67.6 | 54.9 | 7,062 | 19.3 | 9,413 | 25.8 | | |
| Upper | 3,670 | 2,737 | 9.2 | 74.6 | 599 | 16.3 | 334 | 9.1 | | |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | |
| Total AA | 56,395 | 29,656 | 100.0 | 52.6 | 13,237 | 23.5 | 13,502 | 23.9 | | |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | | | |
| Low | 423 | 13.6 | 365 | 13.3 | 54 | 20.0 | 4 | 4.8 | | |
| Moderate | 902 | 29.0 | 800 | 29.0 | 78 | 28.9 | 24 | 28.9 | | |
| Middle | 1,597 | 51.4 | 1,420 | 51.6 | 125 | 46.3 | 52 | 62.7 | | |
| Upper | 185 | 6.0 | 169 | 6.1 | 13 | 4.8 | 3 | 3.6 | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | |
| Total AA | 3,107 | 100.0 | 2,754 | 100.0 | 270 | 100.0 | 83 | 100.0 | | |
| Percentage of Total Businesses: | | | 88.6 | | 8.7 | | 2.7 | | | |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | | | |
| Low | 2 | 1.4 | 2 | 1.4 | 0 | 0.0 | 0 | 0.0 | | |
| Moderate | 25 | 18.0 | 25 | 18.0 | 0 | 0.0 | 0 | 0.0 | | |
| Middle | 107 | 77.0 | 107 | 77.0 | 0 | 0.0 | 0 | 0.0 | | |
| Upper | 5 | 3.6 | 5 | 3.6 | 0 | 0.0 | 0 | 0.0 | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | |
| Total AA | 139 | 100.0 | 139 | 100.0 | 0 | 0.0 | 0 | 0.0 | | |
| Percentage of Total Farms: | | | 100.0 | | 0.0 | | 0.0 | | | |
| Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | | | |

Table D-4

| 2023 Eastern Oklahoma AA Demographics | | | | | | | | | | | | | | |
|---|------------------------------------|------------|--------------------------|------------------|--|----------------------|---------------------------|-------|--|--|--|--|--|--|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | | | | | | | |
| | # | % | # | % | # | % | # | % | | | | | | |
| Low | 2 | 5.9 | 566 | 2.2 | 224 | 39.6 | 6,457 | 25.0 | | | | | | |
| Moderate | 8 | 23.5 | 6,325 | 24.5 | 1,406 | 22.2 | 4,950 | 19.1 | | | | | | |
| Middle | 21 | 61.8 | 16,420 | 63.5 | 2,214 | 13.5 | 5,240 | 20.3 | | | | | | |
| Upper | 3 | 8.8 | 2,545 | 9.8 | 263 | 10.3 | 9,209 | 35.6 | | | | | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Total AA | 34 | 100.0 | 25,856 | 100.0 | 4,107 | 15.9 | 25,856 | 100.0 | | | | | | |
| Housing Units by Tract | Housing Type by Tract | | | | | | | | | | | | | |
| | Owner-occupied | | | Rental | | Vacant | | | | | | | | |
| | # | % by tract | % by unit | # | % by unit | # | % by unit | | | | | | | |
| Low | 1,529 | 501 | 1.8 | 32.8 | 671 | 43.9 | 357 | 23.3 | | | | | | |
| Moderate | 12,942 | 5,648 | 20.8 | 43.6 | 4,254 | 32.9 | 3,040 | 23.5 | | | | | | |
| Middle | 33,979 | 18,332 | 67.4 | 54.0 | 6,826 | 20.1 | 8,821 | 26.0 | | | | | | |
| Upper | 3,670 | 2,737 | 10.1 | 74.6 | 599 | 16.3 | 334 | 9.1 | | | | | | |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Total AA | 52,120 | 27,218 | 100.0 | 52.2 | 12,350 | 23.7 | 12,552 | 24.1 | | | | | | |
| Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | | | | | | | |
| | # | % | # | % | # | % | # | % | | | | | | |
| Low | 433 | 14.2 | 376 | 13.9 | 53 | 19.6 | 4 | 5.7 | | | | | | |
| Moderate | 752 | 24.6 | 670 | 24.7 | 63 | 23.2 | 19 | 27.1 | | | | | | |
| Middle | 1,624 | 53.2 | 1,443 | 53.2 | 138 | 50.9 | 43 | 61.4 | | | | | | |
| Upper | 246 | 8.1 | 225 | 8.3 | 17 | 6.3 | 4 | 5.7 | | | | | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Total AA | 3,055 | 100.0 | 2,714 | 100.0 | 271 | 100.0 | 70 | 100.0 | | | | | | |
| Percentage of Total Businesses: | | | 88.8 | | 8.9 | | 2.3 | | | | | | | |
| Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | | | | | | | |
| | # | % | # | % | # | % | # | % | | | | | | |
| Low | 2 | 1.5 | 2 | 1.5 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Moderate | 28 | 20.4 | 28 | 20.6 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Middle | 101 | 73.7 | 100 | 73.5 | 0 | 0.0 | 1 | 100.0 | | | | | | |
| Upper | 6 | 4.4 | 6 | 4.4 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | | | | | |
| Total AA | 137 | 100.0 | 136 | 100.0 | 0 | 0.0 | 1 | 100.0 | | | | | | |
| Percentage of Total Farms: | | | 99.3 | | 0.0 | | 0.7 | | | | | | | |
| 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. | | | | | | | | | | | | | | |

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table E-1

| Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography | | | | | | | | | | | | | |
|---|----------------------------------|--------------|--------------|---------------|--------------|--------------|-----------|--------------|--------------|--------------|--------------|------------------------|--------------|
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | Owner Occupied Units % | |
| | 2023 | | | | | | 2024 | | | | | | |
| | Bank | Agg | Bank | Agg | | | Bank | Agg | Bank | Agg | | | |
| # | # % | # % | \$ (000) | \$ % | \$ % | | # | # % | \$ (000) | \$ % | \$ % | | |
| Home Purchase Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 6.5 | 0 | 0.0 | 4.2 | 1 | 9.1 | 5.1 | 252 | 8.1 | 3.2 | 5.9 |
| Moderate | 2 | 20.0 | 24.2 | 256 | 4.2 | 16.5 | 3 | 27.3 | 25.0 | 407 | 13.0 | 17.5 | 26.4 |
| Middle | 4 | 40.0 | 30.1 | 797 | 13.2 | 25.6 | 3 | 27.3 | 30.9 | 735 | 23.5 | 26.9 | 318 |
| Upper | 4 | 40.0 | 38.2 | 4,989 | 82.6 | 52.9 | 4 | 36.4 | 38.2 | 1,736 | 55.5 | 51.8 | 34.7 |
| Unknown | 0 | 0.0 | 1.0 | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.8 | 0 | 0.0 | 0.6 | 1.3 |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 10 | 100.0 | 100.0 | 6,042 | 100.0 | 100.0 | 11 | 100.0 | 100.0 | 3,130 | 100.0 | 100.0 | 100.0 |
| Refinance Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 5.5 | 0 | 0.0 | 3.0 | 0 | 0.0 | 6.6 | 0 | 0.0 | 4.0 | 5.9 |
| Moderate | 0 | 0.0 | 26.7 | 0 | 0.0 | 18.2 | 0 | 0.0 | 25.9 | 0 | 0.0 | 18.8 | 26.4 |
| Middle | 1 | 50.0 | 32.8 | B6 | 37.8 | 28.1 | 0 | 0.0 | 31.5 | 0 | 0.0 | 27.5 | 318 |
| Upper | 1 | 50.0 | 34.4 | 224 | 62.2 | 50.2 | 0 | 0.0 | 35.2 | 0 | 0.0 | 49.4 | 34.7 |
| Unknown | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.5 | 0 | 0.0 | 0.8 | 0 | 0.0 | 0.4 | 1.3 |
| 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 | 360 | 100.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Home Improvement Loans | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 5.2 | 0 | 0.0 | 5.1 | 0 | 0.0 | 4.4 | 0 | 0.0 | 4.1 | 5.9 |
| Moderate | 0 | 0.0 | 20.7 | 0 | 0.0 | 14.6 | 0 | 0.0 | 24.3 | 0 | 0.0 | 20.3 | 26.4 |
| Middle | 0 | 0.0 | 31.9 | 0 | 0.0 | 26.1 | 0 | 0.0 | 30.6 | 0 | 0.0 | 25.9 | 318 |
| Upper | 0 | 0.0 | 41.3 | 0 | 0.0 | 53.7 | 0 | 0.0 | 39.9 | 0 | 0.0 | 49.1 | 34.7 |
| Unknown | 0 | 0.0 | 0.9 | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.7 | 0 | 0.0 | 0.7 | 1.3 |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 |
| Multifamily Loans | | | | | | | | | | | | | |
| Low | 1 | 33.3 | 10.3 | 2,345 | 36.0 | 7.7 | 0 | 0.0 | 14.3 | 0 | 0.0 | 9.9 | 8.1 |
| Moderate | 0 | 0.0 | 46.8 | 0 | 0.0 | 43.9 | 2 | 100.0 | 37.1 | 1,130 | 100.0 | 34.0 | 41.3 |
| Middle | 0 | 0.0 | 20.6 | 0 | 0.0 | 20.1 | 0 | 0.0 | 25.7 | 0 | 0.0 | 28.1 | 27.9 |
| Upper | 2 | 66.7 | 21.4 | 4,170 | 64.0 | 25.8 | 0 | 0.0 | 21.4 | 0 | 0.0 | 27.4 | 18.6 |
| Unknown | 0 | 0.0 | 0.8 | 0 | 0.0 | 2.4 | 0 | 0.0 | 1.4 | 0 | 0.0 | 0.6 | 4.1 |
| 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 | 6,515 | 100.0 | 100.0 | 2 | 100.0 | 100.0 | 1,130 | 100.0 | 100.0 | 100.0 |
| Total Home Mortgage Loans | | | | | | | | | | | | | |
| Low | 1 | 6.7 | 6.1 | 2,345 | 18.2 | 4.4 | 1 | 7.7 | 5.3 | 252 | 5.9 | 4.0 | 5.9 |
| Moderate | 2 | 13.3 | 24.1 | 256 | 2.0 | 19.0 | 5 | 38.5 | 24.8 | 1,537 | 36.1 | 19.3 | 26.4 |
| Middle | 5 | 33.3 | 30.7 | 933 | 7.2 | 25.5 | 3 | 23.1 | 31.2 | 735 | 17.3 | 27.1 | 318 |
| Upper | 7 | 46.7 | 38.1 | 9,383 | 72.6 | 50.4 | 4 | 30.8 | 37.8 | 1,736 | 40.8 | 49.1 | 34.7 |
| Unknown | 0 | 0.0 | 0.9 | 0 | 0.0 | 0.8 | 0 | 0.0 | 0.8 | 0 | 0.0 | 0.6 | 1.3 |
| Tract-unk | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 15 | 100.0 | 100.0 | 12,917 | 100.0 | 100.0 | 13 | 100.0 | 100.0 | 4,260 | 100.0 | 100.0 | 100.0 |
| <i>Source: 2024 FFIEC Census Data</i> | | | | | | | | | | | | | |
| <i>2016-2020 U.S. Census Bureau: American Community Survey</i> | | | | | | | | | | | | | |
| <i>Note: Percentages may not total 100.0 percent due to rounding.</i> | | | | | | | | | | | | | |
| <i>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.</i> | | | | | | | | | | | | | |

Table E-2

| Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan | | | | | | | | | | | | |
|--|----------------------------------|-------|----------|-------|-------|-------|------|----------|--------|-------|-----------------------|--|
| Geographic Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | Total Businesses % | |
| | 2023 | | | | | 2024* | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | | | | |
| # | #% | #% | \$ (000) | \$ % | \$ % | # | #% | \$ (000) | \$ % | | | |
| Low | 0 | 0.0 | 6.0 | 0 | 0.0 | 6.6 | 0 | 0.0 | 0 | 0.0 | 6.9 | |
| Moderate | 2 | 11.8 | 25.8 | 1,850 | 25.8 | 28.4 | 6 | 15.8 | 2,485 | 20.8 | 29.5 | |
| Middle | 6 | 35.3 | 25.8 | 1,495 | 20.8 | 23.8 | 8 | 21.1 | 1,461 | 12.2 | 28.3 | |
| Upper | 8 | 47.1 | 39.9 | 2,989 | 41.6 | 38.9 | 23 | 60.5 | 7,148 | 59.8 | 32.6 | |
| Unknown | 1 | 5.9 | 1.8 | 850 | 11.8 | 2.3 | 1 | 2.6 | 850 | 7.1 | 2.8 | |
| Tract-Unc | 0 | 0.0 | 0.6 | 0 | 0.0 | 0.1 | 0 | 0.0 | 0 | 0.0 | 0.0 | |
| Total | 17 | 100.0 | 100.0 | 7,184 | 100.0 | 100.0 | 38 | 100.0 | 11,944 | 100.0 | 100.0 | |

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.

Table E-3

**Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Oklahoma City Metropolitan**

| Borrower Income Level | Bank And Aggregate Loans By Year | | | | | | | | | | | | Families by Family Income % | |
|----------------------------------|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-------|-----------------------------|--|
| | 2023 | | | | | | 2024 | | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | Agg | Bank | | Agg | | |
| | # | # % | # % | \$ (000) | \$ % | \$ % | # | # % | # % | \$ (000) | \$ % | \$ % | | |
| Home Purchase Loans | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 5.8 | 0 | 0.0 | 2.9 | 0 | 0.0 | 5.8 | 0 | 0.0 | 3.0 | 24.1 | |
| Moderate | 0 | 0.0 | 16.3 | 0 | 0.0 | 11.1 | 0 | 0.0 | 17.0 | 0 | 0.0 | 11.5 | 18.7 | |
| Middle | 1 | 10.0 | 16.9 | 260 | 4.3 | 14.9 | 0 | 0.0 | 17.0 | 0 | 0.0 | 14.4 | 18.8 | |
| Upper | 2 | 20.0 | 30.5 | 756 | 12.5 | 43.0 | 7 | 63.6 | 29.7 | 2,396 | 76.5 | 41.4 | 38.4 | |
| Unknown | 7 | 70.0 | 30.5 | 5,026 | 83.2 | 28.1 | 4 | 36.4 | 30.5 | 734 | 23.5 | 29.7 | 0.0 | |
| Total | 10 | 100.0 | 100.0 | 6,042 | 100.0 | 100.0 | 11 | 100.0 | 100.0 | 3,130 | 100.0 | 100.0 | 100.0 | |
| Refinance Loans | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 8.0 | 0 | 0.0 | 4.2 | 0 | 0.0 | 7.4 | 0 | 0.0 | 3.3 | 24.1 | |
| Moderate | 0 | 0.0 | 15.0 | 0 | 0.0 | 9.6 | 0 | 0.0 | 13.0 | 0 | 0.0 | 7.9 | 18.7 | |
| Middle | 0 | 0.0 | 16.8 | 0 | 0.0 | 13.2 | 0 | 0.0 | 15.4 | 0 | 0.0 | 11.1 | 18.8 | |
| Upper | 1 | 50.0 | 29.6 | 224 | 62.2 | 40.4 | 0 | 0.0 | 27.5 | 0 | 0.0 | 35.6 | 38.4 | |
| Unknown | 1 | 50.0 | 30.6 | 136 | 37.8 | 32.7 | 0 | 0.0 | 36.7 | 0 | 0.0 | 42.1 | 0.0 | |
| Total | 2 | 100.0 | 100.0 | 360 | 100.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 | |
| Home Improvement Loans | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 8.0 | 0 | 0.0 | 4.2 | 0 | 0.0 | 7.9 | 0 | 0.0 | 4.4 | 24.1 | |
| Moderate | 0 | 0.0 | 17.2 | 0 | 0.0 | 10.7 | 0 | 0.0 | 17.2 | 0 | 0.0 | 11.8 | 18.7 | |
| Middle | 0 | 0.0 | 20.7 | 0 | 0.0 | 15.2 | 0 | 0.0 | 23.0 | 0 | 0.0 | 17.7 | 18.8 | |
| Upper | 0 | 0.0 | 45.7 | 0 | 0.0 | 57.1 | 0 | 0.0 | 43.7 | 0 | 0.0 | 54.9 | 38.4 | |
| Unknown | 0 | 0.0 | 8.3 | 0 | 0.0 | 12.9 | 0 | 0.0 | 8.3 | 0 | 0.0 | 11.2 | 0.0 | |
| Total | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 0 | 0.0 | 100.0 | 100.0 | |
| Total Home Mortgage Loans | | | | | | | | | | | | | | |
| Low | 0 | 0.0 | 6.4 | 0 | 0.0 | 3.2 | 0 | 0.0 | 6.3 | 0 | 0.0 | 3.1 | 24.1 | |
| Moderate | 0 | 0.0 | 16.2 | 0 | 0.0 | 10.9 | 0 | 0.0 | 16.2 | 0 | 0.0 | 10.9 | 18.7 | |
| Middle | 1 | 8.3 | 17.3 | 260 | 4.1 | 14.6 | 0 | 0.0 | 17.4 | 0 | 0.0 | 14.0 | 18.8 | |
| Upper | 3 | 25.0 | 32.1 | 980 | 15.3 | 43.3 | 7 | 63.6 | 30.9 | 2,396 | 76.5 | 41.0 | 38.4 | |
| Unknown | 8 | 66.7 | 28.0 | 5,162 | 80.6 | 28.0 | 4 | 36.4 | 29.2 | 734 | 23.5 | 31.1 | 0.0 | |
| Total | 12 | 100.0 | 100.0 | 6,402 | 100.0 | 100.0 | 11 | 100.0 | 100.0 | 3,130 | 100.0 | 100.0 | 100.0 | |

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.

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 are not displayed individually but are included in the total HMDA section of the table.

Table E-4

| Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses | | | | | | | | | | | | | | |
|---|----------------------------------|-------|-------|---------|-------|-------|------|-------|---------|-------|--------------------|--|--|--|
| Assessment Area: Oklahoma City Metropolitan | | | | | | | | | | | | | | |
| | Bank And Aggregate Loans By Year | | | | | | | | | | Total Businesses % | | | |
| | 2023 | | | | | 2024* | | | | | | | | |
| | Bank | | Agg | Bank | | Agg | Bank | | | | | | | |
| | # | #% | #% | \$(000) | \$% | \$% | # | #% | \$(000) | \$% | | | | |
| By Revenue | | | | | | | | | | | | | | |
| \$1 Million or Less | 4 | 23.5 | 53.5 | 195 | 2.7 | 35.0 | 11 | 28.9 | 674 | 5.6 | 90.4 | | | |
| Over \$1 Million | 4 | 23.5 | | 689 | 9.6 | | 12 | 31.6 | 2,385 | 20.0 | 8.4 | | | |
| Revenue | 9 | 52.9 | | 6,300 | 87.7 | | 15 | 39.5 | 8,885 | 74.4 | 1.2 | | | |
| Total | 17 | 100.0 | | 7,184 | 100.0 | | 38 | 100.0 | 11,944 | 100.0 | 100.0 | | | |
| By Loan Size | | | | | | | | | | | | | | |
| \$100,000 or Less | 4 | 23.5 | 92.3 | 195 | 2.7 | 34.7 | 11 | 28.9 | 674 | 5.6 | | | | |
| \$100,001 - \$250,000 | 4 | 23.5 | 4.0 | 689 | 9.6 | 16.0 | 12 | 31.6 | 2,385 | 20.0 | | | | |
| \$250,001 - \$1 | 9 | 52.9 | 3.6 | 6,300 | 87.7 | 49.3 | 15 | 39.5 | 8,885 | 74.4 | | | | |
| Total | 17 | 100.0 | 100.0 | 7,184 | 100.0 | 100.0 | 38 | 100.0 | 11,944 | 100.0 | | | | |
| By Loan Size and Revenues \$1 Million or Less | | | | | | | | | | | | | | |
| \$100,000 or Less | 4 | 100.0 | | 195 | 100.0 | | 11 | 100.0 | 674 | 100.0 | | | | |
| \$100,001 - \$250,000 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | | | |
| \$250,001 - \$1 | 0 | 0.0 | | 0 | 0.0 | | 0 | 0.0 | 0 | 0.0 | | | | |
| Total | 4 | 100.0 | | 195 | 100.0 | | 11 | 100.0 | 674 | 100.0 | | | | |
| Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey | | | | | | | | | | | | | | |
| Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available. | | | | | | | | | | | | | | |

Table E-5

| 2024 Oklahoma City Metropolitan AA Demographics | | | | | | | | | | |
|---|------------------------------------|----------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|--|--|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | | | |
| | # | % | # | % | # | % | # | % | | |
| Low | 26 | 9.8 | 15,253 | 8.1 | 4,903 | 32.1 | 45,154 | 24.1 | | |
| Moderate | 85 | 32.0 | 55,307 | 29.5 | 9,430 | 17.1 | 34,969 | 18.7 | | |
| Middle | 73 | 27.4 | 55,451 | 29.6 | 4,480 | 8.1 | 35,206 | 18.8 | | |
| Upper | 67 | 25.2 | 58,427 | 31.2 | 1,893 | 3.2 | 71,957 | 38.4 | | |
| Unknown | 15 | 5.6 | 2,848 | 1.5 | 1,186 | 41.6 | 0 | 0.0 | | |
| Total AA | 266 | 100.0 | 187,286 | 100.0 | 21,892 | 11.7 | 187,286 | 100.0 | | |
| Housing Units by Tract | Housing Type by Tract | | | | | | | | | |
| | Owner-occupied | | | Rental | | Vacant | | | | |
| | # | % by tract | % by unit | # | % by unit | # | % by unit | | | |
| Low | 30,957 | 10,791 | 5.9 | 34.9 | 15,261 | 49.3 | 4,905 | 15.8 | | |
| Moderate | 114,338 | 47,927 | 26.4 | 41.9 | 52,374 | 45.8 | 14,037 | 12.3 | | |
| Middle | 102,338 | 57,794 | 31.8 | 56.5 | 34,499 | 33.7 | 10,045 | 9.8 | | |
| Upper | 87,846 | 63,042 | 34.7 | 71.8 | 18,979 | 21.6 | 5,825 | 6.6 | | |
| Unknown | 6,033 | 2,320 | 1.3 | 38.5 | 2,793 | 46.3 | 920 | 15.2 | | |
| Total AA | 341,512 | 181,874 | 100.0 | 53.3 | 123,906 | 36.3 | 35,732 | 10.5 | | |
| Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | | | |
| | # | % | # | % | # | % | # | % | | |
| Low | 2,353 | 6.9 | 2,052 | 6.7 | 270 | 9.4 | 31 | 7.7 | | |
| Moderate | 10,046 | 29.5 | 8,991 | 29.2 | 942 | 32.8 | 113 | 28.2 | | |
| Middle | 9,639 | 28.3 | 8,810 | 28.6 | 738 | 25.7 | 91 | 22.7 | | |
| Upper | 11,109 | 32.6 | 10,152 | 32.9 | 804 | 28.0 | 153 | 38.2 | | |
| Unknown | 961 | 2.8 | 828 | 2.7 | 120 | 4.2 | 13 | 3.2 | | |
| Total AA | 34,108 | 100.0 | 30,833 | 100.0 | 2,874 | 100.0 | 401 | 100.0 | | |
| Percentage of Total Businesses: | | | 90.4 | | 8.4 | | 1.2 | | | |
| Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | | | |
| | # | % | # | % | # | % | # | % | | |
| Low | 18 | 5.5 | 16 | 5.0 | 2 | 25.0 | 0 | 0.0 | | |
| Moderate | 70 | 21.5 | 67 | 21.1 | 3 | 37.5 | 0 | 0.0 | | |
| Middle | 91 | 27.9 | 90 | 28.3 | 1 | 12.5 | 0 | 0.0 | | |
| Upper | 147 | 45.1 | 145 | 45.6 | 2 | 25.0 | 0 | 0.0 | | |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | | |
| Total AA | 326 | 100.0 | 318 | 100.0 | 8 | 100.0 | 0 | 0.0 | | |
| Percentage of Total Farms: | | | 97.5 | | 2.5 | | 0.0 | | | |
| Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. | | | | | | | | | | |

Table E-6

| 2023 Oklahoma City Metropolitan AA Demographics | | | | | | | | |
|---|------------------------------------|----------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 26 | 9.8 | 15,253 | 8.1 | 4,903 | 32.1 | 45,154 | 24.1 |
| Moderate | 85 | 32.0 | 55,307 | 29.5 | 9,430 | 17.1 | 34,969 | 18.7 |
| Middle | 73 | 27.4 | 55,451 | 29.6 | 4,480 | 8.1 | 35,206 | 18.8 |
| Upper | 67 | 25.2 | 58,427 | 31.2 | 1,893 | 3.2 | 71,957 | 38.4 |
| Unknown | 15 | 5.6 | 2,848 | 1.5 | 1,186 | 41.6 | 0 | 0.0 |
| Total AA | 266 | 100.0 | 187,286 | 100.0 | 21,892 | 11.7 | 187,286 | 100.0 |
| Housing Units by Tract | Housing Type by Tract | | | | | | | |
| | Owner-occupied | | | Rental | | Vacant | | |
| | # | % by tract | % by unit | # | % by unit | # | % by unit | |
| Low | 30,957 | 10,791 | 5.9 | 34.9 | 15,261 | 49.3 | 4,905 | 15.8 |
| Moderate | 114,338 | 47,927 | 26.4 | 41.9 | 52,374 | 45.8 | 14,037 | 12.3 |
| Middle | 102,338 | 57,794 | 31.8 | 56.5 | 34,499 | 33.7 | 10,045 | 9.8 |
| Upper | 87,846 | 63,042 | 34.7 | 71.8 | 18,979 | 21.6 | 5,825 | 6.6 |
| Unknown | 6,033 | 2,320 | 1.3 | 38.5 | 2,793 | 46.3 | 920 | 15.2 |
| Total AA | 341,512 | 181,874 | 100.0 | 53.3 | 123,906 | 36.3 | 35,732 | 10.5 |
| Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 2,506 | 6.6 | 2,178 | 6.3 | 298 | 9.0 | 30 | 6.4 |
| Moderate | 10,534 | 27.6 | 9,405 | 27.4 | 1,009 | 30.5 | 120 | 25.8 |
| Middle | 10,871 | 28.5 | 9,829 | 28.6 | 930 | 28.1 | 112 | 24.0 |
| Upper | 13,021 | 34.2 | 11,909 | 34.7 | 924 | 27.9 | 188 | 40.3 |
| Unknown | 1,170 | 3.1 | 1,006 | 2.9 | 148 | 4.5 | 16 | 3.4 |
| Total AA | 38,102 | 100.0 | 34,327 | 100.0 | 3,309 | 100.0 | 466 | 100.0 |
| Percentage of Total Businesses: | | | | 90.1 | | 8.7 | | 1.2 |
| Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | | |
| | Less Than or = \$1 Million | | | Over \$1 Million | | Revenue Not Reported | | |
| | # | % | # | % | # | % | # | % |
| Low | 18 | 5.0 | 15 | 4.3 | 3 | 33.3 | 0 | 0.0 |
| Moderate | 68 | 18.9 | 65 | 18.5 | 3 | 33.3 | 0 | 0.0 |
| Middle | 100 | 27.8 | 99 | 28.2 | 1 | 11.1 | 0 | 0.0 |
| Upper | 173 | 48.1 | 171 | 48.7 | 2 | 22.2 | 0 | 0.0 |
| Unknown | 1 | 0.3 | 1 | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 360 | 100.0 | 351 | 100.0 | 9 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 97.5 | | 2.5 | | 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. | | | | | | | | |

APPENDIX F – 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include 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.

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). 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 instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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.