



PUBLIC DISCLOSURE

December 8, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FNB Community Bank
RSSD# 839255

2911 South Air Depot Boulevard
Midwest City, Oklahoma 73110

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

NOTE: This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

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

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

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2022, 2023, and 2024) was referenced for additional perspective to gauge credit demand within the bank's AA. Performance was assessed within the bank's only AA. Examiners reviewed the following data:

- The bank's 13-quarter average NLTD ratio;
- The universe of 260 home mortgage loans reported on the bank's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers;
- A statistical sample of 64 small business loans from a universe of 93 outstanding loans originated between September 20, 2022, and December 31, 2024; and
- CD loans, qualified investments, and CD services from January 1, 2022, through June 30, 2025.

For this evaluation, greater weight was placed on the bank’s small business lending performance based on the bank’s business strategy and overall loan portfolio composition. Furthermore, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is considered representative of the number of borrowers and entities served.

DESCRIPTION OF INSTITUTION

FNB Community Bank is a community bank headquartered in Midwest City, Oklahoma. The bank’s characteristics include:

- The bank is a wholly-owned subsidiary of First Midwest Acquisition Corporation (FMAC).
- The bank has total assets of \$474.1 million (MM) as of June 30, 2025.
- In addition to its main office in Midwest City, the bank has six additional offices located in Del City, Harrah, Moore, Choctaw, and Midwest City, Oklahoma.
- The bank operates 13 cash-only automated teller machines (ATMs); one located in each of the bank’s seven locations, with six additional ATMs located at various offsite locations; two at Tinker Air Force Base, one at Carl Albert High School, one in Crest Discount Food, one at Del Crest Center, and two at Country Boy #9. Since the previous examination, the bank closed two standalone ATMs that were located inside Tinker Air Force Base in May 2025.
- As shown in the table below, the bank’s primary business focus is commercial and residential real estate lending.

Table 1

Composition of Loan Portfolio as of June 30, 2025		
Loan Type	\$(000)	%
Construction and Land Development	21,965	8.2
Farmland	0	0.0
1- to 4-Family Residential Real Estate	56,108	21.0
Multifamily Residential Real Estate	1,823	0.7
Nonfarm Nonresidential Real Estate	125,875	47.2
Agricultural	273	0.1
Commercial and Industrial	34,759	13.0
Consumer	20,279	7.6
Other	5,792	2.2
Gross Loans	266,874	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its September 19, 2022 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Oklahoma City Metropolitan AA consists of Oklahoma and Cleveland Counties in their entirety, which are two of the seven counties that comprise the Oklahoma City, Oklahoma Metropolitan Statistical Area (MSA). See Appendix A for an AA map and Appendix B for additional demographic data.

- The delineation of the AA has not changed since the prior evaluation.
- The AA is comprised of 28 low-, 92 moderate-, 111 middle-, 87 upper-, and 19 unknown-income census tracts. At the prior evaluation, the AA was comprised of 28 low-, 96 moderate-, 97 middle-, 73 upper-, and 9 unknown-income census tracts.
- According to the June 30, 2025 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, the bank held a 0.9 percent share of deposits in the AA, which ranked 22nd out of 66 FDIC-insured depository institutions operating from 305 offices in the AA.
- One previously conducted interview with a community member within the AA was referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization focused on providing affordable housing to LMI individuals and families.

Table 2

Population Change			
Assessment Area: Oklahoma City Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Oklahoma City Metropolitan	1,023,094	1,091,820	6.7
Cleveland County, OK	268,614	295,528	10.0
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma City, OK MSA	1,318,408	1,425,695	8.1
Oklahoma	3,849,733	3,959,353	2.8
Oklahoma City Metropolitan	1,023,094	1,091,820	6.7

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

- The bank’s Oklahoma City Metropolitan AA accounts for 76.6 percent of the total MSA’s population and 27.6 percent of the total state population.
- Population growth in the AA significantly outpaced the state of Oklahoma from 2015-2020, particularly within Cleveland County, and reflected growth consistent with the Oklahoma City MSA.

Table 3

Median Family Income Change			
Assessment Area: Oklahoma City Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Oklahoma City Metropolitan	68,601	73,178	6.7
Cleveland County, OK	76,689	80,924	5.5
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma City, OK MSA	69,988	75,170	7.4
Oklahoma	63,401	67,511	6.5
Oklahoma City Metropolitan	68,601	73,178	6.7

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

- The Oklahoma City Metropolitan AA has a slightly lower portion of families living below the poverty level at 10.4 percent, compared to 11.3 percent for the state of Oklahoma, but was higher than the MSA figure of 9.5 percent.
- According to data in the 2020 American Community Survey, 40.1 percent of families living in the AA are designated as low- or moderate-income, which is slightly above the statewide figure of 39.1 percent as well as the MSA figure of 38.7 percent.

Table 4

Housing Cost Burden						
Assessment Area: Oklahoma City Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Oklahoma City Metropolitan	77.5	37.6	41.0	59.2	28.9	16.5
Cleveland County, OK	75.6	43.9	40.2	65.4	33.4	15.8
Oklahoma County, OK	78.0	35.4	41.3	57.5	27.4	16.8
Oklahoma City, OK MSA	76.7	36.8	40.2	55.6	29.5	15.8
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4
Oklahoma City Metropolitan	77.5	37.6	41.0	59.2	28.9	16.5

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

- The median housing value in the AA of \$162,204 was comparable to the Oklahoma City, OK MSA average of \$162,598, and above the state of Oklahoma average of \$142,400.
- There are 457,521 housing units in the AA, of which 54.9 percent are owner-occupied, 35.6 percent are rental units and 9.6 percent are vacant units.
- The median age of housing stock in the AA was 46 years of age. When segregated by the income level of census tract, the median age was 61 years

in low-, 59 years in moderate-, 45 years in middle-, and 32 years in upper-income census tracts. The older age of homes in LMI census tracts suggest more dilapidated homes in need of repair.

Table 5

Unemployment Rates					
Assessment Area: Oklahoma City Metropolitan					
Area	2020	2021	2022	2023	2024
Oklahoma City Metropolitan	6.2	4.0	2.8	3.0	3.1
Cleveland County, OK	5.5	3.3	2.6	2.8	2.9
Oklahoma County, OK	6.5	4.2	3.0	3.1	3.2
Oklahoma City, OK MSA	6.1	3.8	2.8	3.0	3.1
Oklahoma	6.3	4.0	3.0	3.2	3.3
Oklahoma City Metropolitan	6.2	4.0	2.8	3.0	3.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to information from the Greater Oklahoma City Chamber, the key industries within the area include aviation & aerospace, energy, bioscience, and logistics. Additionally, the major employers in the area include the State of Oklahoma, Tinker Air Force Base, Oklahoma State University-Stillwater, University of Oklahoma-Norman, INTEGRIS Health, and Amazon.
- The 2024 unemployment figures in the AA and the state of Oklahoma have trended down from highs in 2020 and have remained relatively stable from 2021 through 2023.

Table 6

Home Mortgage Loan Trends					
Assessment Area: Oklahoma City Metropolitan					
Area	2020	2021	2022	2023	2024
Oklahoma City Metropolitan	36,274	36,764	22,553	15,960	17,437
Cleveland County, OK	10,150	10,484	6,220	4,226	4,646
Oklahoma County, OK	26,124	26,280	16,333	11,734	12,791
Oklahoma City, OK MSA	50,505	51,411	32,019	23,266	25,804
Oklahoma	112,123	117,165	75,886	56,064	60,670

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

- The community contact noted that housing values have risen in recent years and stated that single-family homes priced above \$200,000 typically remain on the market for about six months, while homes priced below \$200,000 tend to sell within days, reflecting a strong demand for lower-priced affordable housing.
- The community contact considered the lack of affordable housing, increased interest rates, and lack of housing for the homeless population to be the most pressing concerns.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank’s overall lending test performance is Satisfactory. In determining the overall lending test rating, equal weight was given to each of the performance criteria. For the geographic and borrower analyses, loan data over the multi-year review period was combined for 2022 through 2024 and evaluated in aggregate within the AA and compared to 2024 demographic data, as there were no significant changes during the multi-year review period. See Appendix C for 2022 lending tables.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, similar lending portfolio compositions, and geographic proximity to the bank.

The bank’s NLTD ratio is reasonable. Although the bank’s ratio is lower than the five similarly situated banks, it is considered reasonable given the bank obtains a large portion of its deposits from public entities, which the bank is unable to lend against. While all five comparator banks also held public funds on deposit, the bank held the highest percentage of these funds as a portion of its total deposits.

Table 7

Comparative NLTD Ratios June 30, 2022 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			13-Quarter Average
FNB Community Bank	Midwest City, OK	474,129	61.1
Similarly Situated Institutions			
City National Bank and Trust Company	Lawton, OK	448,474	83.9
Legacy Bank	Hinton, OK	642,440	67.9
Prism Bank	Guthrie, OK	518,556	98.6
All America Bank	Oklahoma City, OK	605,378	92.1
First National Bank and Trust Company of Ardmore	Ardmore, OK	681,044	72.9

Assessment Area Concentration

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

Table 8

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
CV - Home Purchase - Conventional	90	90.9	16,669	92.9	9	9.1	1,277	7.1
HI - Home Improvement	49	87.5	2,159	90.2	7	12.5	235	9.8
MF - Multi-Family Housing	4	100.0	2,820	100.0	0	0.0	0	0.0
OC - Other Purpose Closed-End	37	92.5	2,073	89.9	3	7.5	234	10.1
RF - Refinancing	54	88.5	5,268	88.8	7	11.5	663	11.2
Total HMDA related	234	90.0	28,989	92.3	26	10.0	2,409	7.7
SB - Small Business	42	65.6	4,569	47.4	22	34.4	5,070	52.6
Total Loans	276	85.2	33,558	81.8	48	14.8	7,479	18.2

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

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. While the bank’s distribution of small business loans is reasonable, the bank’s distribution of home mortgage lending is excellent.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank’s lending to small businesses located in low-income census tracts was above the demographic figure representing the percentage of total businesses by income level of the geography. The bank’s lending to small businesses located in moderate-income census tracts was comparable to the demographic figure.

The analysis of the dispersion of lending across the AA revealed a conspicuous gap that included LMI census tracts; however, this did not impact the conclusion given the distance from these tracts to the nearest bank branch office and the level of competition the bank faces in the AA.

Table 9

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography									
Assessment Area: Oklahoma City Metropolitan									
Geographic Income Level	Bank Loans By Year								Total Businesses %
	2023				2024				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3	13.0	545	15.4	5.6
Moderate	3	21.4	172	21.5	7	30.4	548	15.5	24.8
Middle	8	57.1	542	67.8	8	34.8	2,241	63.5	33.3
Upper	3	21.4	86	10.8	5	21.7	195	5.5	32.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	3.4
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0	
Total	14	100.0	800	100.0	23	100.0	3,529	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.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2024 home mortgage loans among LMI census tracts was above aggregate lending data by number volume as well as the demographic figure, which represents the percentage of owner-occupied units in each census tract by income level. The bank’s lending compared to aggregate lending data by dollar volume was comparable in low-income tracts but above in moderate-income tracts.

The geographic distribution of home mortgage loans in 2023 was consistent with performance in 2024 and supported the overall conclusion.

The analysis of the dispersion of lending across the AA revealed a conspicuous gap that included LMI census tracts; however, this did not impact the conclusion given the distance from these tracts to the nearest bank branch office and the level of competition the bank faces in the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of 2024 home purchase loans among LMI census tracts was above aggregate lending data by number and dollar volume, as well as the demographic figure.

The geographic distribution of home purchase loans in 2023 was consistent with performance in 2024 and supported the overall conclusion.

Home Refinance Lending

The geographic distribution of home refinance lending is excellent. The distribution of 2024 home refinance loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume and the demographic figure. The distribution of home refinance loans among moderate-income census tracts was above aggregate lending data by number and dollar volume and the demographic figure.

The geographic distribution of home refinance loans in 2023 was below performance in 2024 but did not impact the overall conclusion.

Table 10

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Oklahoma City Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	4	10.3	4.9	370	5.1	3.2	7	13.7	3.9	723	7.7	2.5	4.4
Moderate	16	41.0	19.2	3,378	46.5	13.2	29	56.9	20.0	4,986	53.0	14.1	20.5
Middle	12	30.8	35.9	1,696	23.4	30.8	10	19.6	36.7	2,699	28.7	31.9	37.9
Upper	7	17.9	38.9	1,819	25.0	52.1	4	7.8	38.5	808	8.6	50.8	36.0
Unknown	0	0.0	1.0	0	0.0	0.7	1	2.0	0.8	190	2.0	0.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	7,263	100.0	100.0	51	100.0	100.0	9,406	100.0	100.0	100.0
Refinance Loans													
Low	2	7.4	4.2	600	22.5	2.4	1	3.7	4.9	109	4.2	3.0	4.4
Moderate	8	29.6	21.1	674	25.3	14.5	11	40.7	19.9	610	23.4	14.3	20.5
Middle	9	33.3	38.2	602	22.6	32.4	10	37.0	37.0	1,466	56.2	31.9	37.9
Upper	8	29.6	35.8	785	29.5	50.2	5	18.5	37.2	422	16.2	50.1	36.0
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	0.9	0	0.0	0.7	1.1
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	2,661	100.0	100.0	27	100.0	100.0	2,607	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	4.0	0	0.0	3.9	0	0.0	3.4	0	0.0	3.1	4.4
Moderate	7	28.0	15.9	264	24.2	11.2	9	37.5	18.9	279	26.1	15.6	20.5
Middle	11	44.0	37.2	548	50.2	32.5	8	33.3	35.1	485	45.4	30.0	37.9
Upper	7	28.0	41.7	279	25.6	51.5	7	29.2	41.8	304	28.5	50.0	36.0
Unknown	0	0.0	1.2	0	0.0	0.9	0	0.0	0.9	0	0.0	1.3	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	1,091	100.0	100.0	24	100.0	100.0	1,068	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.2	0	0.0	7.1	0	0.0	14.6	0	0.0	16.6	7.6
Moderate	0	0.0	39.5	0	0.0	39.2	4	100.0	33.5	2,820	100.0	28.3	35.7
Middle	0	0.0	29.6	0	0.0	27.2	0	0.0	27.8	0	0.0	25.8	35.7
Upper	0	0.0	21.1	0	0.0	24.4	0	0.0	21.5	0	0.0	28.3	17.5
Unknown	0	0.0	0.7	0	0.0	2.1	0	0.0	2.5	0	0.0	1.0	3.6
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	4	100.0	100.0	2,820	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	6	5.2	4.6	970	7.8	3.4	8	6.7	4.0	832	5.0	3.8	4.4
Moderate	35	30.4	19.0	4,527	36.5	15.1	56	47.1	19.6	8,822	53.2	15.4	20.5
Middle	44	38.3	36.5	3,626	29.2	30.7	35	29.4	36.9	4,952	29.9	31.3	37.9
Upper	30	26.1	38.9	3,293	26.5	49.9	19	16.0	38.7	1,777	10.7	48.8	36.0
Unknown	0	0.0	0.9	0	0.0	0.8	1	0.8	0.8	190	1.1	0.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	115	100.0	100.0	12,416	100.0	100.0	119	100.0	100.0	16,573	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.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with annual revenues of \$1MM or less was comparable to the demographic figure, which represents the percentage of total businesses in the AA with revenues of \$1MM or less. Furthermore, 90.4 percent of small business loans were originated in amounts of \$250,000 or less, which further demonstrates the bank’s willingness to meet the credit needs of small entities, as lower dollar amounts are typically demanded by small businesses.

Table 11

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses									
Assessment Area: Oklahoma City Metropolitan									
	Bank Loans By Year								Total Businesses
	2023				2024				
	#	#%	\$(000)	%	#	#%	\$(000)	%	%
By Revenue									
\$1 Million or Less	7	50.0	337	42.1	16	69.6	866	24.5	91.1
Over \$1 Million	7	50.0	463	57.9	7	30.4	2,663	75.5	7.8
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	1.1
Total	14	100.0	800	100.0	23	100.0	3,529	100.0	100.0
By Loan Size									
\$100,000 or Less	13	92.9	694	86.8	17	73.9	761	21.6	
\$100,001 - \$250,000	1	7.1	106	13.3	2	8.7	290	8.2	
\$250,001 - \$1 Million	0	0.0	0	0.0	4	17.4	2,478	70.2	
Total	14	100.0	800	100.0	23	100.0	3,529	100.0	
By Loan Size and Revenue \$1 Million or Less									
\$100,000 or Less	7	100.0	337	100.0	14	87.5	576	66.5	
\$100,001 - \$250,000	0	0.0	0	0.0	2	12.5	290	33.5	
\$250,001 - \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0	
Total	7	100.0	337	100.0	16	100.0	866	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.									

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2024 home mortgage lending to low-income borrowers was comparable to aggregate lending data by number and dollar volume while below the demographic figure, which represents the percentage of families by income level. Lending to moderate-income borrowers was comparable to aggregate lending data by number, below by dollar volume, and comparable to the demographic figure.

The borrower distribution of home mortgage loans in 2023 was consistent with performance in 2024 and supported the overall rating.

Home Purchase Lending

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

The borrower distribution of home purchase loans in 2023 was consistent with performance in 2024.

Home Refinance Lending

The borrower distribution of home refinance lending is reasonable. The distribution of 2024 home refinance loans to low-income borrowers was above aggregate lending data by number, comparable by dollar volume, and below the demographic figure. The distribution of home refinance loans to moderate-income borrowers was below aggregate lending data by number, dollar volume, and the demographic figure.

The borrower distribution of home refinance loans in 2023 was consistent with performance in 2024 and supported the overall rating.

Table 12

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	5.3	0	0.0	2.7	1	2.0	5.3	286	3.0	2.7	22.2
Moderate	1	2.6	16.8	150	2.1	11.6	1	2.0	17.1	70	0.7	11.8	17.9
Middle	1	2.6	17.7	140	1.9	15.8	2	3.9	18.1	200	2.1	15.6	20.1
Upper	3	7.7	30.9	522	7.2	42.6	1	2.0	30.1	1,304	13.9	41.0	39.8
Unknown	34	87.2	29.3	6,451	88.8	27.3	46	90.2	29.5	7,546	80.2	28.9	0.0
Total	39	100.0	100.0	7,263	100.0	100.0	51	100.0	100.0	9,406	100.0	100.0	100.0
Refinance Loans													
Low	2	7.4	7.5	27	1.0	3.9	4	14.8	6.5	85	3.3	2.9	22.2
Moderate	5	18.5	15.6	234	8.8	10.1	2	7.4	13.5	85	3.3	8.2	17.9
Middle	1	3.7	17.5	72	2.7	14.2	2	7.4	16.3	107	4.1	12.2	20.1
Upper	8	29.6	31.8	767	28.8	42.2	10	37.0	28.1	761	29.2	35.0	39.8
Unknown	11	40.7	27.6	1,561	58.7	29.6	9	33.3	35.6	1,569	60.2	41.7	0.0
Total	27	100.0	100.0	2,661	100.0	100.0	27	100.0	100.0	2,607	100.0	100.0	100.0
Home Improvement Loans													
Low	2	8.0	7.3	80	7.3	4.1	2	8.3	7.5	30	2.8	4.2	22.2
Moderate	5	20.0	17.4	190	17.4	11.5	5	20.8	15.9	96	9.0	11.0	17.9
Middle	7	28.0	20.0	195	17.9	15.5	10	41.7	23.0	563	52.7	18.1	20.1
Upper	9	36.0	47.4	508	46.6	56.7	7	29.2	45.6	379	35.5	55.6	39.8
Unknown	2	8.0	7.9	118	10.8	12.2	0	0.0	8.0	0	0.0	11.1	0.0
Total	25	100.0	100.0	1,091	100.0	100.0	24	100.0	100.0	1,068	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	4.3	5.9	142	1.1	2.9	8	7.0	5.7	429	3.1	2.8	22.2
Moderate	13	11.3	16.6	694	5.6	11.4	14	12.2	16.3	425	3.1	11.1	17.9
Middle	15	13.0	18.0	745	6.0	15.5	17	14.8	18.4	1,042	7.6	15.1	20.1
Upper	35	30.4	33.1	2,705	21.8	43.2	21	18.3	31.5	2,742	19.9	40.5	39.8
Unknown	47	40.9	26.4	8,130	65.5	26.9	55	47.8	28.2	9,115	66.3	30.4	0.0
Total	115	100.0	100.0	12,416	100.0	100.0	115	100.0	100.0	13,753	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.													

COMMUNITY DEVELOPMENT TEST

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

The bank’s overall CD test performance is Outstanding and demonstrates excellent responsiveness. Specific examples of qualified activities include:

- The bank originated three loans totaling \$6.4MM to a local government authority to revitalize and stabilize a moderate-income area of Del City, Oklahoma. The loans were used for commercial construction and land development.
- The bank made annual donations in 2022, 2023, 2024, and 2025 to a non-profit that provides food to families facing food insecurity in the local area. The donations for all four years totaled \$20,585.
- Additionally, a bank representative served in a board membership capacity for an area organization that provides community services to LMI individuals and families located in a low-income census tract.

In addition, based on the bank meeting the CD needs in its AA, consideration was also given to the bank’s CD activities that took place outside of its AA, within the broader statewide/regional area. This included eight municipal bonds for schools in which the majority of students qualified for free or reduced-price lunches; proceeds were used for various construction, furnishing, and equipment needs of these schools.

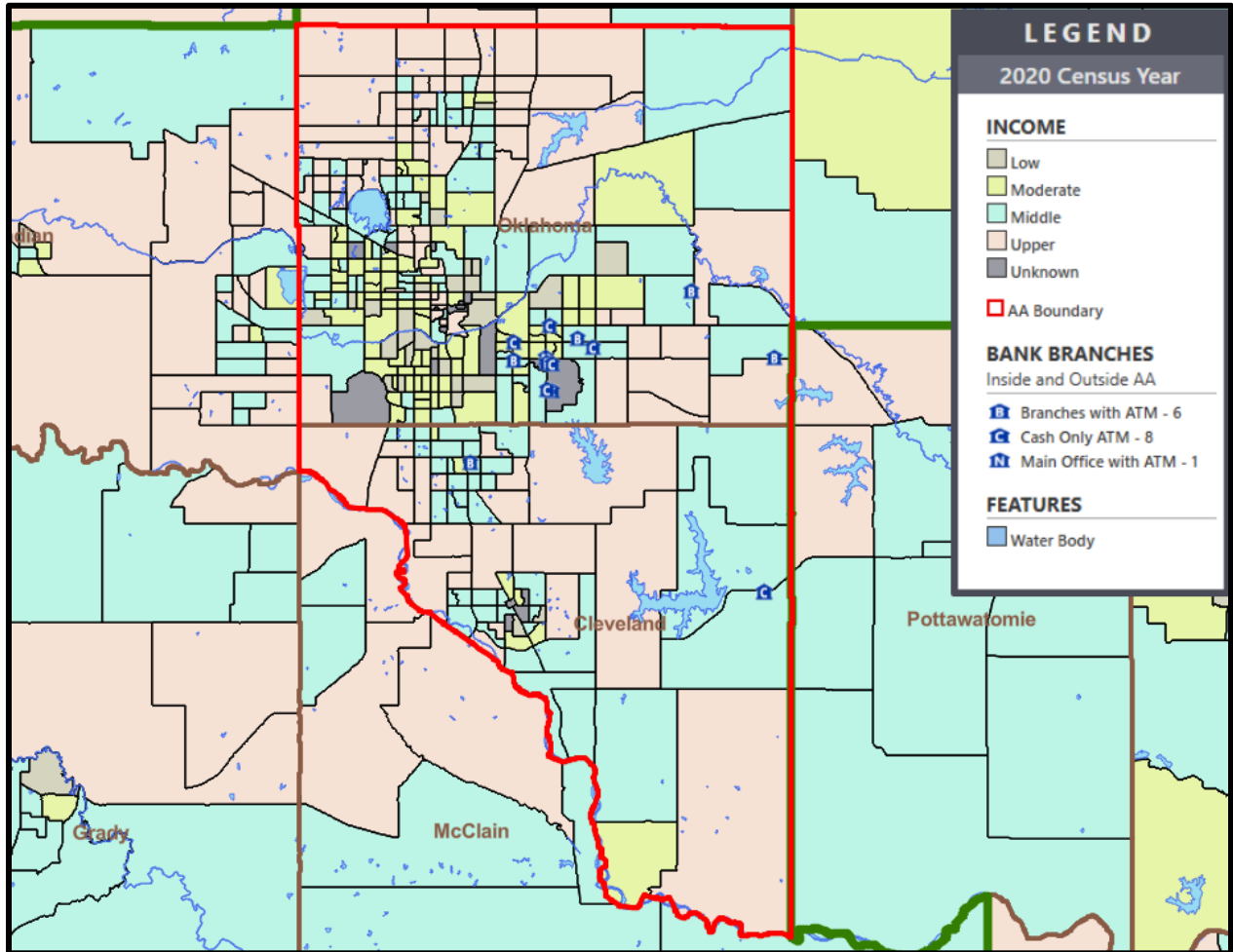
Table 13

Community Development Activity Assessment Area: Oklahoma City Metropolitan										
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services #	
	#	\$(000)	Investments		Donations		Total Investments			
			#	\$(000)	#	\$(000)	#	\$(000)		
Affordable Housing	-	-	-	-	-	-	-	-	-	3.5
Community Services	4	4,200	3	1,289	18	35	21	1,324		12
Economic Development	-	-	1	500	-	-	1	500		-
Revitalization and Stabilization	3	6,417	2	971	-	-	2	971		-
Outside Activities	-	-	8	6,749	-	-	8	6,749		-
Totals	7	10,617	14	9,509	18	35	32	9,544		15.5

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – MAP OF THE ASSESSMENT AREA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

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	28	8.3	15,730	6.1	4,994	31.7	57,183	22.2
Moderate	92	27.3	60,127	23.4	10,159	16.9	45,960	17.9
Middle	111	32.9	94,538	36.8	7,499	7.9	51,544	20.1
Upper	87	25.8	82,841	32.2	2,641	3.2	102,329	39.8
Unknown	19	5.6	3,780	1.5	1,426	37.7	0	0.0
Total AA	337	100.0	257,016	100.0	26,719	10.4	257,016	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	33,270	11,098	4.4	33.4	17,043	51.2	5,129	15.4
Moderate	124,338	51,488	20.5	41.4	57,536	46.3	15,314	12.3
Middle	168,451	95,271	37.9	56.6	58,897	35.0	14,283	8.5
Upper	123,308	90,379	36.0	73.3	25,156	20.4	7,773	6.3
Unknown	8,154	2,874	1.1	35.2	4,108	50.4	1,172	14.4
Total AA	457,521	251,110	100.0	54.9	162,740	35.6	43,671	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,402	5.6	2,096	5.4	274	8.2	32	6.8
Moderate	10,573	24.8	9,467	24.3	991	29.6	115	24.5
Middle	14,239	33.3	13,135	33.8	978	29.2	126	26.8
Upper	14,042	32.9	12,902	33.2	961	28.7	179	38.1
Unknown	1,444	3.4	1,283	3.3	143	4.3	18	3.8
Total AA	42,700	100.0	38,883	100.0	3,347	100.0	470	100.0
Percentage of Total Businesses:				91.1		7.8		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	18	4.1	16	3.7	2	25.0	0	0.0
Moderate	72	16.5	69	16.1	3	37.5	0	0.0
Middle	146	33.5	145	33.9	1	12.5	0	0.0
Upper	196	45.0	194	45.3	2	25.0	0	0.0
Unknown	4	0.9	4	0.9	0	0.0	0	0.0
Total AA	436	100.0	428	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.2		1.8		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 B-2

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	28	8.3	15,730	6.1	4,994	31.7	57,183	22.2
Moderate	92	27.3	60,127	23.4	10,159	16.9	45,960	17.9
Middle	111	32.9	94,538	36.8	7,499	7.9	51,544	20.1
Upper	87	25.8	82,841	32.2	2,641	3.2	102,329	39.8
Unknown	19	5.6	3,780	1.5	1,426	37.7	0	0.0
Total AA	337	100.0	257,016	100.0	26,719	10.4	257,016	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	33,270	11,098	4.4	33.4	17,043	51.2	5,129	15.4
Moderate	124,338	51,488	20.5	41.4	57,536	46.3	15,314	12.3
Middle	168,451	95,271	37.9	56.6	58,897	35.0	14,283	8.5
Upper	123,308	90,379	36.0	73.3	25,156	20.4	7,773	6.3
Unknown	8,154	2,874	1.1	35.2	4,108	50.4	1,172	14.4
Total AA	457,521	251,110	100.0	54.9	162,740	35.6	43,671	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,566	5.4	2,232	5.2	303	7.9	31	5.7
Moderate	11,093	23.4	9,916	23.1	1,055	27.7	122	22.6
Middle	15,884	33.5	14,546	33.8	1,193	31.3	145	26.9
Upper	16,161	34.1	14,849	34.5	1,091	28.6	221	40.9
Unknown	1,647	3.5	1,453	3.4	173	4.5	21	3.9
Total AA	47,351	100.0	42,996	100.0	3,815	100.0	540	100.0
Percentage of Total Businesses:				90.8		8.1		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	18	3.7	15	3.2	3	33.3	0	0.0
Moderate	70	14.6	67	14.2	3	33.3	0	0.0
Middle	165	34.3	164	34.7	1	11.1	0	0.0
Upper	223	46.4	221	46.8	2	22.2	0	0.0
Unknown	5	1.0	5	1.1	0	0.0	0	0.0
Total AA	481	100.0	472	100.0	9	100.0	0	0.0
Percentage of Total Farms:				98.1		1.9		0.0
<i>Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table B-3

2022 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	28	8.3	15,730	6.1	4,994	31.7	57,183	22.2
Moderate	92	27.3	60,127	23.4	10,159	16.9	45,960	17.9
Middle	111	32.9	94,538	36.8	7,499	7.9	51,544	20.1
Upper	87	25.8	82,841	32.2	2,641	3.2	102,329	39.8
Unknown	19	5.6	3,780	1.5	1,426	37.7	0	0.0
Total AA	337	100.0	257,016	100.0	26,719	10.4	257,016	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	33,270	11,098	4.4	33.4	17,043	51.2	5,129	15.4
Moderate	124,338	51,488	20.5	41.4	57,536	46.3	15,314	12.3
Middle	168,451	95,271	37.9	56.6	58,897	35.0	14,283	8.5
Upper	123,308	90,379	36.0	73.3	25,156	20.4	7,773	6.3
Unknown	8,154	2,874	1.1	35.2	4,108	50.4	1,172	14.4
Total AA	457,521	251,110	100.0	54.9	162,740	35.6	43,671	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,693	5.3	2,351	5.1	309	7.9	33	5.3
Moderate	11,724	23.1	10,500	22.7	1,095	27.8	129	20.6
Middle	17,111	33.7	15,703	34.0	1,230	31.3	178	28.4
Upper	17,435	34.3	16,054	34.7	1,119	28.4	262	41.8
Unknown	1,800	3.5	1,594	3.5	181	4.6	25	4.0
Total AA	50,763	100.0	46,202	100.0	3,934	100.0	627	100.0
Percentage of Total Businesses:				91.0		7.7		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	17	3.2	14	2.7	3	33.3	0	0.0
Moderate	85	16.1	82	15.8	3	33.3	0	0.0
Middle	175	33.2	174	33.6	1	11.1	0	0.0
Upper	244	46.3	242	46.7	2	22.2	0	0.0
Unknown	6	1.1	6	1.2	0	0.0	0	0.0
Total AA	527	100.0	518	100.0	9	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – ADDITIONAL LENDING TABLES

Table C-1

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	5.3
Moderate	1	20.0	31	12.9	23.1
Middle	1	20.0	33	13.7	33.7
Upper	3	60.0	177	73.4	34.3
Unknown	0	0.0	0	0.0	3.5
Tract-Unk	0	0.0	0	0.0	
Total	5	100.0	241	100.0	100.0

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

Table C-2

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Oklahoma City Metropolitan					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	5	100.0	241	100.0	91.0
Over \$1 Million	0	0.0	0	0.0	7.7
Revenue Unknown	0	0.0	0	0.0	1.2
Total	5	100.0	241	100.0	100.0
By Loan Size					
\$100,000 or Less	5	100.0	241	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	5	100.0	241	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	5	100.0	241	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	5	100.0	241	100.0	

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

APPENDIX D – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

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

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

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

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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