



PUBLIC DISCLOSURE

October 30, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank and Trust Company of Broken Arrow
Charter Number 7115

121 South Main Street
Broken Arrow, OK 74012

Office of the Comptroller of the Currency
8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

NOTE: This document is an evaluation of this institution'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, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The lending test rating is based on the one full-scope assessment area (AA) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, market focus, competition, and lending opportunities in the AA.
- A majority of loans were originated or purchased inside the bank's AA.
- The bank exhibits reasonable geographic distribution of loans in moderate-income census tracts (CTs).
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank did not receive any complaints related to the Community Reinvestment Act (CRA) during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

The First National Bank & Trust Company of Broken Arrow's (FNBBB or bank) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 73.64. The bank's LTD ratio had a high average of 92.37 percent in the second quarter of 2019 and low average of 56.16 percent in fourth quarter 2021. We compared the bank's LTD ratio to five peer group banks in their market area and a nearby county ranging in total asset sizes of \$112 million to \$461 million. The aggregate average LTD ratio for competing banks was 73.24 percent, with a low average of 50.98 percent and a high average of 91.07 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated 83.6 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019 - 2021	20	83.33	4	16.67	24	6,225	92.94	473	7.06	6,698
Subtotal	20	83.33	4	16.67	24	6,225	92.94	473	7.06	6,698
Small Business										
2019 - 2021	21	84.00	4	16.00	25	11,012	92.05	951	7.95	11,964
Subtotal	21	84.00	4	16.00	25	11,012	92.05	951	7.95	11,964
Total	41	83.67	8	16.33	49	17,237	92.37	1,424	7.63	18,662
<i>Source: Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

FNBBA is an intrastate community bank headquartered in Broken Arrow, Oklahoma. As of December 31, 2021, FNBBA reported total assets of \$249.7 million, with loans of \$129 million (52 percent of total assets), and tier 1 capital of \$24.5 million. The bank’s loan portfolio comprises 60 percent commercial loans, 39 percent one- to four-family residential loans, one percent other loan products. FNBBA is wholly owned by First Broken Arrow Corporation, a one-bank holding company with consolidated assets of \$24.5 million.

FNBBA has one rating area within the state of Oklahoma, with one AA. The bank’s partial Tulsa metropolitan statistical area (MSA) AA includes 117 CTs in Eastern Tulsa County and 15 CTs in Western Wagoner County. All of the CTs in the AA are part of the Tulsa MSA. The bank’s AA is essentially bounded by the Verdigris River on the east, Admiral Street on the north, and the Arkansas River on the south and west sides. Within the AA, there are three low-income CTs, 33 moderate-income CTs, 46 middle-income CTs, and 50 upper-income CTs. The bank has two locations within their AA, including the main bank and one branch which is located within the city of Broken Arrow. Both locations offer reasonable lobby hours Monday through Friday. Extended drive-through hours are offered Monday through Saturday. The bank’s Aspen branch location was closed in December 2020.

There is strong competition for banking services to meet the credit and deposit needs of the AA. The bank offers a full range of deposit and loan products and services. The bank’s primary focus is commercial lending, although it offers a variety of consumer loan and deposit products to meet the needs of the community.

There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its AA and CT. The bank was rated Satisfactory at its last CRA examination dated November 4, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of FNBBA's CRA activities in its AA under the Small Bank CRA procedures, which includes the lending test. The lending test evaluates how well the bank meets the credit needs of its AAs through lending activities.

The OCC compared bank loan data for all applicable years to demographic data using the U.S. Census American Community Survey (ACS), Federal Financial Institutions Examination Council (FFIEC) adjusted median family income, 2021 Dun and Bradstreet (D&B) small business demographic, small business data reported under CRA, and 2021 peer mortgage loan data reported under Home Mortgage Disclosure Act (HMDA).

Conclusions regarding the lending performance are based on samples of small business loans and one- to four-family residential real estate mortgage loans originated for the period January 1, 2019, through December 31, 2021. When evaluating the bank's performance under the lending test, we placed greater weight on commercial loans, as this is the bank's primary loan product. Commercial loan information was considered in context, as the analyses for non-HMDA reporting banks and small business loans are typically based on a sample of loans, rather than on total bank originations and purchases over the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based primarily on performance in the AA.

As of December 31, 2021, Commercial Small Business loans represented over 60 percent of total bank loans. For the lending test, we analyzed both small loans to businesses and home mortgage loans. We placed greater weight on small loans to businesses based on the percentage of loan activities, which is consistent with FNBBA's lending strategy.

FNBBA has only one AA in one state. Ratings are based solely on the results of this AA.

The state rating is based on performance in the bank's AAs. Refer to the "Scope" section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Satisfactory

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AA.
- The distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.

Description of Institution's Operations in Oklahoma

FNBBA has one AA in the state of Oklahoma, which meets the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income geographies.

FNBBA's AA consists of 132 contiguous CTs, which includes Eastern Tulsa County and Western Wagoner County. FNBBA's AA consists of three low-income CTs, 33 moderate-income CTs, 46 middle-income CTs, and 50 upper income CTs. The bank's facilities are all located in Eastern Tulsa County.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA

Partial Tulsa MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Eastern Tulsa County & Western Wagoner County 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	132	2.3	25.0	34.8	37.9	0.0
Population by Geography	458,495	2.0	23.9	36.0	38.1	0.0
Housing Units by Geography	203,849	2.3	25.2	36.6	35.9	0.0
Owner-Occupied Units by Geography	111,994	0.3	16.1	37.1	46.5	0.0
Occupied Rental Units by Geography	72,552	5.1	36.9	36.4	21.5	0.0
Vacant Units by Geography	19,303	3.1	34.3	34.1	28.5	0.0
Businesses by Geography	71,891	1.5	18.9	35.1	44.5	0.0
Farms by Geography	1,647	1.5	17.1	39.9	41.5	0.0
Family Distribution by Income Level	115,550	18.1	16.5	19.9	45.4	0.0
Household Distribution by Income Level	184,546	21.7	15.6	18.2	44.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$158,043
			Median Gross Rent			\$792
			Families Below Poverty Level			9.5%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The table above summarizes the demographic characteristics of the CTs that make up the AA. The table shows the demographic characteristics of the AA according to the 2015 ACS and 2021 D&B data. Tulsa and Wagoner counties have a population of 458,495 and the average medium family income was \$61,182. As of December 31, 2021, the unemployment rate was 2.6 percent, and there are approximately 9 percent of families living below the poverty level.

According to the December 31, 2021, Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Oklahoma, FNBBA has \$220 million in deposits with a deposit share of 0.65 percent. The bank ranks 27th out of 50 institutions in the AA. The largest depository institutions were BOKF, Arvest Bank, Bank of America, and MidFirst Bank, which held a combined 55 percent market share in the AA.

Competition for lending is strong with 50 home mortgage lenders in the AA. According to community contacts, housing prices are not affordable for low to moderate income (LMI) borrowers based on the average cost of housing and the LMI levels for the AA. This analysis also does not consider other factors that can affect housing affordability for borrowers such as existing debt levels or the lack of liquidity for down payment and closing costs.

Community Contact

The OCC relied on two community contacts within the AA to gain a better understanding of the general community development and credit needs, as well as local economic conditions. The two community contacts included a public housing authority organization and a district economic development corporation. Both contacts identified area and regional businesses such as the Amazon Fulfillment Center, Whirlpool Corporation, American Airlines, and QuikTrip Corporation as major economic contributors in the area. In addition, area hospitals including Saint Francis Health System, Hillcrest Healthcare System, and Ascension St. John were also identified. Each of these larger companies employs at least 1,000 employees and contribute to the local economy.

A community contact stated the COVID epidemic had a huge impact on small businesses in the area causing many businesses to close. There are plenty of opportunities for bank involvement and the contact felt local banks are actively responding to community needs. Local institutions are involved in Small Business Administration lending as there is an increased need in small business lending as well as a need for financial literacy and education. Some institutions are assisting with the Small Business University to help provide financial education to small businesses.

Demographics were identified as relatively stable but a lack of affordable homes in the Tulsa area was emphasized by one community contact. The limited stock of affordable homes is being bought by investors or middle-income borrowers with the ability to bid more than the low- and moderate-income borrower. The contact indicated there is not much demand from LMI borrowers for home loans as they are being discouraged by the price of homes in the area as well as not having the credit to qualify for home loans. Many multi-family projects have been completed but none for single-family homes. The contact stated that none of the multi-family projects were geared towards LMI families or individuals. One contact expressed a desire to see more banks get involved in down payment assistance programs as those types of programs are very limited in the area. Both community contacts stated that local banks are doing what they can to support the credit needs of the communities.

Scope of Evaluation in Oklahoma

FNBBBA has only one AA which consists of a portion of the Tulsa, OK MSA in the state of Oklahoma. The partial Tulsa MSA AA received a full-scope review. There are no limited-scope review areas.

LENDING TEST

The bank's performance under the lending test in the state of Oklahoma is rated satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the partial Tulsa MSA is reasonable when considering the number of low-income CTs, the percentage of families living below the poverty level, and the lack of affordable housing in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

There are only three (2.2 percent) low-income CTs in the AA.

Home Mortgage Loans

The bank's geographic distribution of home mortgage is poor.

Refer to Table O in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the 2019-2021 analysis period, the bank did not originate any home mortgage loans in low-income geographies in proportion to 0.3 percent of owner-occupied housing units and 0.1 percent aggregate distribution. Based on the low volume of owner-occupied units and the low number of CTs in low-income geographies, the bank's performance is considered reasonable.

The distribution of home mortgage loans to moderate-income geographies was poor. The bank did not originate any home mortgage loans in moderate-income geographies in proportion to 16.1 percent of owner-occupied housing units and 11.2 percent aggregate distribution.

Small Loans to Businesses

The bank's distribution of small loans to businesses is reasonable.

When determining the conclusion in this AA, we also considered the fact there is a low percentage of businesses in LMI CTs. There are only 1.5 percent of businesses in low-income geographies and 18.9 percent in moderate-income geographies.

Refer to Table Q in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

During the 2019-2021 analysis period, the bank did not distribute small loans to businesses in low-income geographies in proportion to 1.5 percent of businesses and 1.8 percent aggregate distribution. Based on the low volume of businesses and the low number of CTs in low-income geographies, the bank's performance is considered reasonable.

The percentage of small loans to businesses was somewhat lower than both the percentage of businesses in moderate-income geographies and the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The bank's distribution of home mortgage loans is reasonable.

Refer to Table P in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

During the 2019-2021 analysis period, the distribution of home mortgages to low-income borrowers was reasonable. The percentage of loans was lower than the percentage of families and equal to the aggregate distribution.

The distribution of home mortgages to moderate-income borrowers was reasonable. The percentage of loans was somewhat lower than both the percentage of families and the aggregate distribution.

Small Loans to Businesses

The bank's distribution of small loans to businesses by revenue is reasonable.

Refer to Table R in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During 2019-2021, the distribution of the bank's loans to small businesses by revenue was reasonable. The percentage of loans was near to the percentage of small businesses and exceeds the aggregate distribution of loans to those businesses.

Responses to Complaints

FNBBBA received no CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home Mortgage and Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
Partial Tulsa MSA AA	Full Scope	Eastern Tulsa County Western Wagoner County

Appendix B: Summary of MMSA and State Ratings

RATINGS - First National Bank and Trust Company of Broken Arrow	
Overall Bank:	Lending Test Rating
FNB of Broken Arrow	Satisfactory
State:	
Oklahoma	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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 non-relatives 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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
FNB Broken Arrow AA	20	6,225	100	23,066	0.3	0.0	0.1	16.1	0.0	11.2	37.1	35	37.0	46.5	65	51.7	0.0	0.0	0.0		
Total	20	6,225	100	23,066	0.3	0.0	0.1	16.1	0.0	11.2	37.1	35	37.0	46.5	65	51.7	0.0	0.0	0.0		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
FNB Broken Arrow AA	20	6,225	100	23,066	18.1	5.0	5.0	16.5	10.0	15.1	19.9	15.0	18.1	45.4	70.0	35.8	0.0	0.0	25.9		
Total	20	6,225	100	23,066	18.1	5.0	5.0	16.5	10.0	15.1	19.9	15.0	18.1	45.4	70.0	35.8	0.0	0.0	25.9		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
FNB Broken Arrow AA	21	11,012	100	12,939	1.5	0.0	1.8	18.9	9.6	18.1	35.1	33.3	36.6	44.5	57.1	43.6	0.0	0.0	0.0		
Total	21	11,012	100	12,939	1.5	0.0	1.8	18.9	9.6	18.1	35.1	33.3	36.6	44.5	57.1	43.6	0.0	0.0	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
FNB of Broken Arrow AA	25	11,964	100	12,939	89.2	80.51	41.5	3.8	19.49	7.1	0.0		
Total	25	11,964	100	12,939	89.2	80.51	41.5	3.8	19.49	7.1	0.0		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.