



PUBLIC DISCLOSURE

September 12, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust
Charter Number 3601

225 State Street
Phillipsburg, KS 67661

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510
Wichita, KS 67226

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 **Outstanding**.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on Outstanding performance in the State of Kansas.
- The bank exhibited excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- A reasonable loan-to-deposit (LTD) ratio.
- A majority of the bank's loans were made within its assessment area (AA).
- The bank exhibited excellent responsiveness to community development (CD) needs and opportunities within the AA.

Loan-to-Deposit Ratio

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

First National Bank and Trust's (FNB&T) average quarterly LTD ratio is 73.7 percent. This ratio reflects satisfactory performance given the bank's lending capacity, market competition, geographic demographic and economic factors, and lending opportunities within the AA. Examiners compared FNB&T to five similarly situated institutions within the bank's AA. The five other institutions' LTD ratios averaged 71.8 percent and ranged from an average low of 60.7 percent to an average high of 85.1 percent.

Lending in Assessment Area

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

The bank originated and purchased 60 percent of its total loans by number inside the bank's AA during the evaluation period based on a random sample of loans. 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 the other performance criteria.

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		
	#	%	#	%		\$	%	\$	%	
Agricultural	12	60	8	40	20	434	34.4	829	65.6	1,263
Total	12	60	8	40	20	434	34.4	829	65.6	1,263
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

FNB&T is an intrastate financial institution located in Phillipsburg, Kansas. As of December 31, 2021, FNB&T had total assets of \$267.5 million and Tier One Capital of \$38.3 million. The bank is a subsidiary of Golden Plains Bankshares, Inc., a \$38.9 million one-bank holding company also located in Phillipsburg, Kansas. There have been no significant changes in FNB&T's corporate structure, including merger or acquisition activities, since the last CRA examination.

FNB&T's AA includes Phillips, Smith, and Mitchell Counties. As of December 31, 2021, FNB&T operates five branches in nearby communities which include Long Island, Logan, Smith Center, Beloit, and Phillipsburg, Kansas. All facilities offer a full range of products including trust services. FNB&T has drive-up facilities in Phillipsburg, Smith Center, and Beloit. Each of these facilities have a cash dispensing Automated Teller Machine (ATM). The bank has an additional cash dispensing ATM at a grocery store in Phillipsburg. As of June 30, 2021, FNB&T's deposit share in the AA totaled \$217.6 million and ranked second out of eight depository institutions in the AA. FNB&T has not closed any offices since the prior CRA examination.

In addition to the full range of consumer, commercial, and agricultural banking products and services, the bank offers online banking through their website. The website allows customers to obtain updated account activity, transfer funds between accounts, make loan payments, and receive E-statements. Bill pay is also available online. Customers have the option of mobile banking with personal devices, which allows customers the ability to check account balances, pay bills, and transfer money. Mobile deposit is also a feature of the application. FNB&T is a participating lender in the Kansas Housing Resources Commission's and the Federal Home Loan Bank's First Time Homebuyers Programs. These programs provide considerable tax savings for first time home buyers and grants to assist low- and moderate-income families with down payment and closing costs. During the evaluation period, FNB&T made 18 loans awarding \$90,000 in forgivable grants to first-time homebuyers. Other programs the bank is involved in include the Farm Service Agency Guaranteed Loans, Kansas Development Finance Authority loans, and Small Business Administration Loans.

As of December 31, 2021, the loan portfolio totaled \$148.3 million, which represented 65 percent of total deposits and 55.4 percent of total assets. The loan portfolio had the following composition: agriculture 54.4 percent; commercial loans 21.1 percent; residential real estate 14.9 percent; consumer loans 6.8 percent, and other loan products 2.7 percent.

All three counties in FNB&T's AA are designated by the FFIEC as distressed and/or underserved areas. The AA is reasonable, complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The bank is not subject to any pending litigation or other factors hindering its ability to meet the credit needs of its AA. The prior CRA examination dated November 5, 2018, rated FNB&T "Outstanding" under the Small Bank CRA examination criteria.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB&T using the Small Bank examination procedures. Our review included a lending test which assessed FNB&T's performance in meeting AA credit needs from January 1, 2019, through December 31, 2021. The bank was evaluated based on its primary lending product of agricultural loans, which comprised the majority of originations by both number and dollar amount since the last CRA examination. Our sample included 20 agricultural loans the bank originated during the evaluation period. Evaluating CD activities is optional under the Small Bank procedures; however, at management's request, examiners reviewed the bank's CD lending, qualified investments, and service activities for 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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 a blend of the state ratings, and where applicable, multistate ratings.

The bank's rating is based on the full scope review of its one AA, and the lending performance within the AA. We evaluated CD activities to assess the bank's responsiveness to AA needs, and to determine if these efforts enhanced credit availability in the AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA 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 bank's 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 performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Kansas

CRA rating for the State of Kansas¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support the state rating include:

- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank exhibited excellent responsiveness to CD needs and opportunities of the AA.

Description of Institution's Operations in Kansas

FNB&T designates Phillips, Smith, and Mitchell Counties as its AA. Phillips and Smith Counties are contiguous, while Mitchell County is close to the other counties. The AA is in a nonmetropolitan statistical area. The AA includes seven census tracts, all of which are middle-income tracts.

Competition among financial institutions in the AA is strong. Based on the Federal Deposit Insurance Corporation's Deposit Market Share Report dated June 30, 2021, FNB&T ranks second in deposit market share with 27.8 percent of deposits inside the AA. The top competitor has a market share of 29.8 percent.

As a part of this evaluation, examiners utilized previous community contacts to assess the credit needs and opportunities in the AA. All contacts identified agricultural loans as the primary need in the AA, with rising input costs straining profit margins amid a volatile market. Nearly all the contacts indicated that area banks are active in the local community and are meeting the needs of the area's borrowers. One contact stated that additional opportunities exist for banks to lend to start-up small businesses and potential home buyers in the area.

Phillips – Smith – Mitchell Counties

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2019-2021 Phillips-Smith-Mitchell Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	100.0	0.0	0.0
Population by Geography	15,537	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	8,574	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	5,096	0.0	0.0	100.0	0.0	0.0

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.

Occupied Rental Units by Geography	1,607	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,871	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,564	0.0	0.0	100.0	0.0	0.0
Farms by Geography	398	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	4,328	16.2	19.8	21.8	42.2	0.0
Household Distribution by Income Level	6,703	22.8	17.2	18.3	41.8	0.0
Median Family Income Non-MSAs - KS	\$57,229	Median Housing Value				\$76,332
		Median Gross Rent				\$508
		Families Below Poverty Level				6.5%
<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>						

According to the 2015 ACS U.S. Census and 2021 D&B Data, the population of the AA is 15,537. The 2021 HUD non-MSA median family income for the AA is \$57,229. Of the 6,703 households in the AA, 38 percent receive social security benefits and 11 percent are below the poverty level. Twenty-three percent of the population is over the age 65, and 37 percent of the population consists of civilians not in the workforce. The median housing value is \$76,332, with 59.4 percent of the housing units being owner-occupied. The income distribution for families within the AA is 16.2 percent low-income, 19.8 percent moderate-income, 21.8 percent middle-income, and 42.2 percent upper income.

Agricultural activities continue to drive the local economy and are the primary credit need for the area. Agriculture has been impacted by declining commodity prices and sustained dry conditions over several years. Major employers for Phillips and Smith Counties include healthcare and social assistance, agriculture, and educational services. Major employers for Mitchell County include healthcare and social assistance, retail trade, agriculture, and manufacturing.

Scope of Evaluation in Kansas

Examiners completed a full-scope review of the bank's AA, evaluating lending performance of agricultural loans during the evaluation period.

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding.

Distribution of Loans by Income Level of the Geography

Our review did not include an analysis of the geographic distribution of loans. The AA does not contain any low- or moderate-income census tracts, therefore an analysis of geographic distribution of loans originated in the AA would not be meaningful.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Farms

Refer to Table T in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was excellent.

Based on those farms with known revenues, the bank's percentage of small loans to farms with gross annual revenue of \$1 million or less was near to the percentage of farms in the AA with gross annual revenue of \$1 million or less, but exceeded the aggregate distribution of small loans to farms with gross annual revenue of \$1 million or less by all lenders. All the loans originated without farm revenue information were small dollar volumes well-below \$100,000, which typically reflects a small farm operation as the bank's documented income consisted of wage income and no farm revenue information.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Performance related to CD activities had a positive effect on the bank's rating in the state during the evaluation period.

Number and Amount of Community Development Loans

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Phillips-Smith-Mitchell Counties	881	100	24,332	100

CD loans exhibited excellent responsiveness to CD needs and opportunities in the AA during the evaluation period. FNB&T originated 881 CD loans totaling \$24.3 million in the AA from 2019-2021. Eight hundred sixty-three loans were made through the SBA Paycheck Protection Program (PPP) to pay employee wages during the COVID-19 pandemic. The bank also originated 18 loans through the Federal Home Loan Bank's (FHLB) first time home buyer grant program. This program provides funds to low- and moderate-income individuals for down payment assistance, with no repayment requirement if the borrower resides in the home for five years.

Number and Amount of Qualified Investments

CD investments exhibited an adequate level of responsiveness to community needs and opportunities in the AA. FNB&T purchased one qualifying investment to replace the windows in two buildings of a local public school system, which serves a student population with a majority of low- and moderate-income families.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phillips – Smith – Mitchell Counties	0	0	1	240	1	100	240	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

FNB&T demonstrated excellent responsiveness in providing CD services in the AA. Bank employees provided 126 hours to 12 qualified CD organizations during the evaluation period. Examples of CD services provided by bank staff include:

- Bank employees participated in the FHLB first time home buyer grant program, helping to facilitate applications for qualifying low- and moderate-income individuals.
- Board member of an area-wide economic development commission, serving the rural counties of Northwest Kansas. The organization facilitates SBA 504 and other financing options for startup or expanding businesses in the Northwest Kansas region.
- Bank employees provided financial education to area students relating to prudent financial management concepts and behaviors.

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:	Small Farm Loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Kansas		
Phillips-Smith-Mitchell Counties	Full Scope	The Non-MSA AA is comprised of three full counties that are comprised of middle-income census tracts.

Appendix B: Summary of MMSA and State Ratings

RATINGS: FIRST NATIONAL BANK AND TRUST	
Overall Bank:	Lending Test Rating
First National Bank and Trust	Outstanding
State:	
Kansas	Outstanding

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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Phillips-Smith-Mitchell Counties	20	1,013,433	100.0	127	96.5	85	18.9	2.3	0.0	1.3	15.0	
Total	20	1,013,433	100.0	127	96.5	85	18.9	2.3	0.0	1.3	15.0	
<i>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%</i>												

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.