



PUBLIC DISCLOSURE

February 22, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Oklahoma
Charter Number 11397
10900 Hefner Pointe Drive
Oklahoma City, OK 73120

Office of the Comptroller of the Currency
Oklahoma City Field Office
The Harvey Parkway Building
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116-7908

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: Satisfactory.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on the two full-scope assessment areas (AAs) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is *more than reasonable* considering First National Bank of Oklahoma's (FNBOK) size, financial condition, and credit needs of the assessment areas (AAs).
- A *substantial majority* of FNBOK's residential and commercial real estate loans originated during the evaluation period are inside of their AAs.
- FNBOK's distribution of residential and commercial real estate loans reflects a *reasonable distribution* of loan originations among borrowers of different income levels and businesses with different levels of gross annual revenues (GAR).
- The geographic distribution of residential and commercial real estate loans reflects an excellent distribution of loans throughout FNBOK's AAs.
- The Community Development (CD) Test rating is based on the two full-scope AAs in the state of Oklahoma.
- FNBOK's performance under the CD test demonstrates *excellent responsiveness* to the CD needs of its AAs.

Description of Institution

FNBOK is a \$617 million national bank headquartered in Oklahoma City, Oklahoma, and a subsidiary of First Bancorp of Oklahoma, Inc., a single bank holding company. FNBOK owns 100 percent of Tonkawa Business Incubator, LLC, (“TBI”), Tonkawa, Oklahoma, a certified Small Business Incubator by the Oklahoma Department of Commerce. TBI embraces business support services tailored to new and emerging companies in the Tonkawa area with the intent to create sustainable businesses, which contribute to local and regional economic growth. The Oklahoma Small Business Incubators Incentive Act enables the tenants of certified business incubators to be exempt from state tax liability on income earned as a result of occupancy for up to 10 years (subject to qualifications). Two former tenants of TBI have since financially matured and relocated to their own facilities. The former tenants are both energy support companies and employ 15 employees within the Kay County AA.

FNBOK’s AA comprises all of Oklahoma County (part of the Oklahoma MSA) and Kay County (non-MSA). Within Oklahoma County FNBOK serves its AA with a main banking facility at 5101 N. Western Avenue in Oklahoma City (moderate-income census tract), and a full-service branch location at 10900 Hefner Pointe Drive in Oklahoma City (upper-income census tract). Both locations include drive-thru facilities, and the Western Avenue location has a drive-thru Automated Teller Machine (ATM). Additionally, FNBOK has established an agreement with the FIS NYCE Network, the bank’s ATM provider, to allow customers surcharge free access to over 100 Transfund ATMs located in Oklahoma City metro area 7-11 stores.

Within Kay County FNBOK serves its AA with a full-service branch at 1501 East Prospect Avenue, Ponca City (middle-income census tract), and 101 West Grand, Tonkawa (middle-income census tract). Both locations in Kay County include drive-thru facilities and ATMs. There are no low-income census tracts in Kay County. The bank also owns and operates ATMs at Venture Foods in Tonkawa, and at the Stop-N-Go on South 14th Street and the Ponca City Medical Center in Ponca City. FNBOK has not closed any banking locations since the previous evaluation.

Despite strong competition for banking services, to meet the credit and deposit needs of the AA, FNBOK offers a diverse line of loan and deposit products and services during reasonable hours Monday through Saturday. FNBOK also offers an internet banking product that provides customers with deposit, transfer, bill payment, and cash management services when a bank facility is not convenient. FNBOK’s strategic lending focus remains consumer real estate purchase, refinance, agriculture, general commercial, commercial real estate (CRE), and consumer lending.

The following table describes the composition of FNBOK’s loan portfolio as of December 31, 2020, which represents 76 percent of total assets. Bank management does not anticipate significant changes to the composition of the loan portfolio in the near future.

Loan Distribution - FNBOK as of December 31, 2020		
Loan Category	\$ (000)	% of Gross Loans
Consumer Loans	9,576	2.05%
Commercial Loans	69,704	14.89%
Construction	31,468	6.72%
Residential Real Estate Loans	114,378	24.43%
Commercial Real Estate Loans	198,927	42.49%
Farmland/Agriculture Loans	42,699	9.12%
Other Loans	1,371	0.30%
Total	468,123	100.00%

Source: 12/31/2020 Call Report Data

Based on the June 30, 2020 Federal Deposit Market Share Report, FNBOK's presence within the AA is moderate as they have 29 percent of the deposit market share in Oklahoma County, and 21 percent of the deposit market share in Kay County. Competition for deposits within each AA is strong and highly competitive, and many of the competitors within Oklahoma county are large or midsize banks with significantly greater resources than FNBOK. A CRA Performance Evaluation (PE) was last prepared November 13, 2017 and a "Outstanding" rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB of OK - Kay AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	27.3	54.5	18.2	0.0
Population by Geography	45,587	0.0	23.8	59.0	17.2	0.0
Housing Units by Geography	21,626	0.0	23.4	60.3	16.3	0.0
Owner-Occupied Units by Geography	12,488	0.0	20.5	58.1	21.3	0.0
Occupied Rental Units by Geography	5,627	0.0	24.0	68.4	7.5	0.0
Vacant Units by Geography	3,511	0.0	32.3	55.3	12.4	0.0
Businesses by Geography	2,935	0.0	22.6	58.1	19.3	0.0
Farms by Geography	235	0.0	12.3	67.7	20.0	0.0
Family Distribution by Income Level	11,553	21.4	18.4	19.7	40.5	0.0
Household Distribution by Income Level	18,115	23.3	17.2	17.3	42.2	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$80,562
			Median Gross Rent			\$621
			Families Below Poverty Level			13.6%
<i>Source: 2015 ACS and 2020 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB of OK - MSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	11.6	35.3	29.0	20.7	3.3
Population by Geography	754,480	10.6	32.4	29.7	26.9	0.4
Housing Units by Geography	326,985	10.2	34.0	29.9	25.4	0.5
Owner-Occupied Units by Geography	171,014	6.1	25.8	32.5	35.4	0.1
Occupied Rental Units by Geography	120,376	14.5	43.1	27.2	14.2	0.9
Vacant Units by Geography	35,595	15.5	42.1	26.7	14.9	0.8
Businesses by Geography	86,009	6.2	25.2	29.8	34.2	4.5
Farms by Geography	1,932	5.7	23.6	29.5	39.8	1.5
Family Distribution by Income Level	181,431	24.7	17.9	19.1	38.3	0.0
Household Distribution by Income Level	291,390	26.1	17.7	17.5	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$135,429
			Median Gross Rent			\$794
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS and 2020 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>						

Scope of the Evaluation

Evaluation Period/Products Evaluated

Data Integrity

In November 2020 we completed a comprehensive Home Mortgage Disclosure Act (HMDA) Data Integrity review for residential real estate loans reported in 2018 and 2019. We found data for all years to be reliable, and as a result we relied on filed HMDA data for this CRA examination to assess FNBOK's lending performance.

Selection of Areas for Full-Scope Review

FNBOK's AA comprises Oklahoma County (a part of the Oklahoma MSA) and Kay County (non-MSA) within the state of Oklahoma. The AAs meet the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies. Two AAs were designated for full-scope reviews and there are no areas designated as limited-scope AAs. Full-scope reviews are conducted in AAs where the bank has a substantial share of its deposit and loan business; therefore, we placed more emphasis on performance in the Oklahoma County AA since it contains a majority of the bank's loans and deposits.

Ratings

The bank's overall rating is a blend of the state ratings. FNBOK has only one rating area, the state of Oklahoma, and the bank's overall rating is based on the full-scope reviews of the two AAs within the state. Within the Kay County AA FNBOK is primarily a small farm and home mortgage lender, therefore, we placed more weight on the bank's lending in these products. Within the Oklahoma County AA FNBOK is primarily a CRE and home mortgage lender, therefore, we place more weight on the bank's lending in these products.

Evaluation Period/Products Evaluated

We evaluated FNBOK using the Intermediate Small Bank standards for assessing performance. Within the Oklahoma County AA, FNBOK's primary loan products include first lien residential real estate loans and CRE loans. We assessed lending performance under the CRA using all residential real estate loan originations reported under the HMDA from January 2, 2018 through December 31, 2020, and a random sample of 40 CRE loans originated during the same period. Within the Kay County AA, FNBOK's primary loan products include first lien residential real estate loans and farm/agriculture loans. We assessed lending performance under the CRA using the HMDA sample referenced above, and a random sample of 40 agriculture loans originated during the same period. The comprehensive sample is representative of FNBOK's business strategy since the last CRA PE. The CD test evaluates FNBOK's responsiveness to meet the credit and development needs of its AA, and we assessed the bank's performance under this test by reviewing qualified CD loan, CD investment, and CD services activity during the same period.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 United States Department of Justice, the United States Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, 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 PE.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

FNBOK's performance under the lending test in the Kay County AA and Oklahoma County AA is **Satisfactory**. This assessment is based on our loan sample for residential mortgage and CRE lending activity beginning January 2, 2018 through December 31, 2020.

Loan-to-Deposit Ratio

FNBOK has a *more than reasonable* LTD ratio relative to their financial condition, local banking competition, and credit needs of the AAs. Since the previous CRA PE, FNBOK's quarterly average LTD 90 percent compared to an 80 percent aggregate average by six similarly located banks during the same period.

Institution	Total Assets (as of December 31, 2020)	Average LTD Ratio
FNBOK	\$617 Million	90%
Valliance Bank	\$564 Million	99%
Quail Creek Bank, National Association	\$767 Million	82%
NBC Oklahoma	\$764 Million	85%
Sooner State Bank	\$297 Million	71%
RCB Bank	\$3.7 Billion	70%
Exchange Bank and Trust Company	\$345 Million	71%

Source: December 31, 2020 Consolidated Reports of Condition and Income; Uniform Bank Performance Report

Lending in Assessment Area

Our review disclosed that a *substantial majority* of the number and dollar level of loans originated during the evaluation period are inside of FNBOK's AA. The following table presents a more specific identification of this lending performance.

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 - 2018	219	73.5	79	26.5	298	41,377	71.1	16,801	28.9	58,178
Home Mortgage - 2019	256	70.3	108	29.7	364	47,404	68.3	22,002	31.7	69,406
Home Mortgage - 2020	216	74.5	74	25.5	290	46,869	77.3	13,758	22.7	60,627
Commercial Real Estate	32	80.0	8	20.0	40	16,640	76.6	5,072	23.4	21,712
Agriculture	27	67.5	13	32.5	40	2,023	54.5	1,688	45.5	3,711
Total	750	72.7	282	27.3	1,032	154,313	72.2	59,321	27.8	213,634

Source: 01/02/2018-12/31/2020 Loan Sample + 2018-2020 HMDA Data

Distribution of Loans by Income Level of the Geography

Lending patterns during the evaluation period indicate an *excellent distribution* of loans throughout FNBOK's AA, particularly CT designated as low-income or moderate-income. There are no low-income CT's within the Kay County AA. The distribution of loans strongly represents the income demographics of each CT in which the residents and businesses function. Please refer to Tables O, Q, and S in Appendix C for a more specific identification of residential, CRE, and agriculture loan distribution activity.

Distribution of Loans by Income Level of the Borrower

Lending patterns during the evaluation period indicate a *reasonable distribution* of loan originations throughout FNBOK's AA, and reasonably represent the income demographics of residents and businesses within each CT. The low percentage of first lien, residential mortgage loans originated to low-income borrowers (relative to the percentage of families within the AA), is primarily the result of the general inability of low- and moderate-income borrowers to afford reasonable housing and meet FNBOK's credit standards, consistent with safe and sound lending; consequently, many LMI families choose to rent rather than purchase homes. Within the Kay County AA, a low-income and moderate-income resident earn less than \$25,746 and \$41,193, respectively. Additionally, according to the 2010 United States Census data (Table A – "Description of Institution" section), 14 percent of the families within the AA are below the poverty level and 26 percent of the housing units within the AA are rental property. Please refer to Tables P, R, and T in Appendix C for a more specific identification of residential, CRE, and agriculture, loan distribution activity.

Responses to Complaints

FNBOK did not receive any consumer complaints regarding their performance under the CRA during the evaluation period.

COMMUNITY DEVELOPMENT TEST

FNBOK's performance under the Community Development test is *Outstanding* and demonstrates *excellent responsiveness* to the CD needs of its AAs. This assessment is based on our review of FNBOK's CD lending, CD investments, and CD services activity since the last CRA PE dated November 13, 2017. A majority of the Oklahoma County AA consists of metropolitan, high-density areas that include Oklahoma City, Edmond, and Midwest City. A majority of the Kay County AA consists of rural, low-density areas that include Ponca City and Tonkawa. Six of the 11 census tracts within the Kay County AA are designated on by the Federal Financial Institutions Examination Council as distressed, middle-income tracts due to poverty (Source: United States Census Bureau Small Area Income and Poverty Estimates).

FNBOK is active in the communities they serve. This is evidenced by their leadership roles in various civic and non-profit organizations that provide services to LMI residents. The bank is also heavily involved with, invests in, and lends to individuals and organizations whose focus is on affordable housing, community services, and economic development.

Number and Amount of Community Development Loans – Oklahoma County AA

The number and dollar level of qualified CD loans within the Oklahoma County AA reflect *excellent responsiveness*.

During the evaluation period FNBOK originated 79 loans to 35 borrowers totaling \$46.7 million that provided funding to local small businesses for economic development within the AA, including LMI areas, and to create and retain LMI jobs. Examples include an \$804,000 loan to a local company that resulted in the creation of 57 jobs for LMI employees; multiple loans totaling \$1.5 million to a local business located in low-income census tract that resulted in the company maintaining 11 LMI jobs.

Additionally, the bank originated five loans totaling \$2.6 million to acquire and renovate affordable multi-unit housing that is affordable for LMI residents. All of the properties are within low- or moderate-income census tracts.

FNBOK was also very active in the Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the Coronavirus (COVID-19) crisis. FNBOK's participation resulted in the origination of 76 qualifying PPP loans totaling \$15.2 million that revitalized or stabilized the AA, including LMI areas. During the evaluation period FNBOK also originated seven non-PPP commercial loans totaling \$6.5 million to local businesses within the AA to revitalize or stabilize the AA.

Number and Amount of Community Development Loans – Kay County AA

The number and dollar level of qualified CD loans within the Kay County AA reflect *excellent responsiveness*.

During the evaluation period FNBOK originated 60 loans to 26 borrowers totaling \$27.8 million that provided funding to local small businesses for economic development within the AA, including LMI areas, and to create and retain LMI jobs. Examples include a \$193,000 loan to re-open a local restaurant and create 23 LMI jobs within the AA, and a \$2.6 million letter of credit to allow a local company to expand and create 7 LMI jobs.

FNBOK was also very active in the Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the Coronavirus (COVID-19) crisis. FNBOK's participation resulted in the origination of 27 qualifying PPP loans totaling \$3.2 million that revitalized or stabilized the AA, including LMI areas. During the evaluation period FNBOK also originated seven non-PPP loans totaling \$6.5 million to local businesses within the AA to revitalize or stabilize the AA.

Number and Amount of Community Development Investments – Oklahoma County AA

The number and dollar level of qualified CD investments within the Oklahoma County AA reflect *excellent responsiveness*.

FNBOK maintains a \$500,000 Equity Equivalent Investment in MetaFund, a CRA-qualified Community Development Financial Institution and a Community Development Entity. In addition to providing affordable housing for low-income individuals and financing commercial projects in low- and moderate-income census tracts, MetaFund provides assistance with financing and credit services for business throughout the Oklahoma County AA.

FNBOK also donated \$150,000 to 47 qualified organizations within the Oklahoma County AA during the evaluation period. Donations were made to local nonprofit organizations that provide economic development support in the AA, and social services, youth programs, job skills, housing needs that target LMI individuals.

Number and Amount of Community Development Investments – Kay County AA

The number and dollar level of qualified CD investments within the Kay County AA reflect *excellent responsiveness*.

During the evaluation period FNBOK invested in 17 qualified municipal investment securities totaling \$5.3 million. The investments in four school districts within Kay County will finance various construction, renovation, and repair activities of school buildings, and new technology equipment for students in the Newkirk schools. More than 50 percent of the student populations in the area schools qualify for the federal free or reduced-price lunch program.

FNBOK also donated \$75,000 to 16 qualified organizations within the Kay County AA during the evaluation period. Donations were made to local nonprofit organizations that provide economic development support in the AA, and social services, youth programs, job skills, housing needs that target LMI individuals.

Extent to Which the Bank Provides Community Development Services – Oklahoma County AA

The extent of qualified CD services within the Oklahoma County AA reflects **excellent responsiveness**.

During the evaluation period, FNBOK facilitated grant funds through the Oklahoma Business Relief Program (OBRP) totaling \$14.0 million to 74 small businesses within the AA. The OBRP is funded by money received from the Coronavirus Aid, Relief, and Security Act of 2020, and used to help businesses across the state overcome the financial challenges suffered due to the pandemic. Bank officers spend time providing technical assistance on financial matters regarding these grants, including obtaining and reviewing required documentation, consultation, and submitting the grant applications to the OBRP for approval.

Five bank officers serve in various leadership positions in seven organizations that are involved in economic or small business development activities, or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. Examples of qualifying CD services include the following.

Western Avenue Association (WAA)

A bank officer serves as board member and Treasurer of this association, providing general oversight regarding programming, budgeting, and fundraising efforts. The WAA is part of the city of Oklahoma City's Commercial District Revitalization Program, which provides opportunities and assistance for local businesses to create vibrant destinations in which to live, work, and shop. Most of the districts have some history of blight or deteriorating neighborhoods, and there are several LMI census tracts within the WAA boundaries.

NewView Oklahoma

A bank officer serves as Chairman of the Board of this organization that provides empowerment, essential life skills, and job placement services to LIM residents within the AA, particularly those with vision impairment.

Extent to Which the Bank Provides Community Development Services – Kay County

The extent of qualified CD services within the Kay County AA reflects **adequate responsiveness**.

During the evaluation period, FNBOK facilitated grant funds through the OBRP totaling \$42,000 to 4 small businesses within the AA. Four bank officers serve in various leadership positions in five organizations that are involved in economic or small business development activities, or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. Examples of qualifying CD services include the following.

Wheatland Resource Conservation and Development (RC&D)

A bank officer serves as board member and also as Chairman of the Finance Committee for RC&D. RC&D is a non-profit organization that serves a number of counties, including Kay County, to promote and enhance economic development of rural areas, support local community leaders, and promote a safe and quality living environment. RC&D also works with local banks and REI Oklahoma in assisting entrepreneurs establishing new businesses or expanding existing businesses by providing them with the equity necessary to qualify for bank financing.

Marland Children's Home

A bank officer serves on the Board of Directors of Marland Children's Home and is currently a member of the Finance Committee. The Marland Children's Home provides a safe, nurturing home, education services, counseling and treatment services, job training and general life skills for young men and women between the ages of 11 and 18. These children are wards of the State of Oklahoma and many of them have previously been victims of neglect and abuse.

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 MSA(s) and non-MSA(s) 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:	(01/02/2018 to 12/31/20)	
Bank Products Reviewed:	Home mortgage loans Small business / CRE loans Agriculture loans Community Development Loans Community Development Investments Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Areas	Type of Exam	Other Information
Oklahoma County Partial MSA	Full-Scope	
Kay County Non-MSA	Full-Scope	

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 United States 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 Small Business Loans 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.

Table S. Assessment Area Distribution of Farm Loans 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 \$500,000) 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2018-2020		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	\$	% of Total	% 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
Kay County AA 2018-2020	257	28,170	12.4	897	0.0	0.0	0.0	20.5	17.5	14.9	58.1	62.3	57.4	21.3	20.2	27.6	0.0	0.0
Oklahoma County AA 2018-2020	434	107,480	20.9	24,599	6.1	9.2	3.6	25.8	38.5	19.1	32.5	22.1	30.5	35.4	29.3	46.5	0.1	0.9
Total	691	135,650	33.3	25,496	5.7	5.8	3.5	25.5	30.7	19.0	34.2	37.0	31.5	34.5	25.9	45.8	0.1	0.6

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 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																2018-2020		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Kay County AA 2018-2020	257	28,170	12.4	897	21.4	3.1	4.0	18.4	10.1	15.7	19.7	19.5	21.2	40.5	55.3	33.1	0.0	12.1
Oklahoma County AA 2018-2020	434	107,480	20.9	24,599	24.7	2.3	7.0	17.9	3.0	16.7	19.1	5.8	17.1	38.3	21.7	34.3	0.0	67.3
Total	691	135,650	33.3	25,496	24.5	2.6	6.9	17.9	5.6	16.7	19.2	10.9	17.2	38.5	34.2	34.3	0.0	46.7

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2018-2020		
Assessment Area: Kay County + Oklahoma County	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CRE	--	--	--	6.0	22.5	6.3	25.2	37.5	23.4	30.7	27.5	31.1	33.7	12.5	35.7	4.4	0.0	0.0
Total	--	--	--	6.0	22.5	6.3	25.2	37.5	23.4	30.7	27.5	31.1	33.7	12.5	35.7	4.4	0.0	3.5

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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											2018-2020	
Assessment Area: Kay County + Oklahoma County	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	
CRE	--	--	--	18,731	87.1	85.0	44.7	4.4	15.0	8.6	0.0	
Total	--	--	--	18,731	87.1	85.0	44.7	4.4	15.0	8.6	0.0	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																2018-2020		
Assessment Area: Kay County + Oklahoma County	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Agriculture	--	--	--	490	5.1	2.5	0.2	22.3	5.0	11.6	33.6	72.5	55.7	37.6	20.0	32.0	0.0	0.0
Total	--	--	--	490	5.1	2.5	0.2	22.3	5.0	11.6	33.6	72.5	55.7	37.6	20.0	32.0	0.0	0.0

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-2020	
Assessment Area: Kay County + Oklahoma County	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	
Agriculture	--		--	490	96.5	90.0	77.8	1.6	10.0	0.0	0.0	
Total	--	--	--	490	96.5	90.0	77.8	1.6	10.0	1.9	0.0	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*