

PUBLIC DISCLOSURE

July 26, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company of Okmulgee Charter Number 11001

> 610 East 8th Street Okmulgee, Oklahoma 74447

Office of the Comptroller of the Currency Tulsa Field Office 8282 South Memorial Drive, Suite 300 Tulsa, Oklahoma 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 our review of two full-scope assessment areas (AAs) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans were originated inside the bank's AAs.
- The geographic distribution of loans reflects excellent distribution throughout the bank's AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes reflects reasonable distribution.

Loan-to-Deposit Ratio

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

First National Bank and Trust Company of Okmulgee's (FNB&T) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 65.38 percent. We compared the bank's LTD ratio to four similarly situated banks in the area. The aggregate average LTD ratio for the competing banks was 59.14 percent, with a high average of 84.75 percent and a low average of 36.54 percent.

Lending in Assessment Areas

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

| | Table D - Lending Inside and Outside of the Assessment Area | | | | | | | | | | | | |
|----------------|---|--------|----------|------|-------|----------|-------|--------|------|----------|--|--|--|
| | N | Vumber | of Loans | | | Dollar A | 000s) | Total | | | | | |
| Loan Category | Insid | de | Outsi | ide | Total | Inside | | | | Outside | | | |
| | # | % | # | % | # | \$ | % | \$ | % | \$(000s) | | | |
| Home Mortgage | 193 | 56.6 | 148 | 43.4 | 341 | 12,794 | 34.6 | 24,208 | 65.4 | 37,002 | | | |
| Small Business | 57 | 75.0 | 19 | 25.0 | 76 | 3,511 | 45.2 | 4,257 | 54.8 | 7,768 | | | |
| Total | 250 | 60.0 | 167 | 40.0 | 417 | 16,305 | 36.4 | 28,465 | 63.6 | 44,770 | | | |

Source: Bank Data

Due to rounding, totals may not equal 100.0%

The bank originated and purchased 60.0 percent of its total loans inside the its AAs 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 the other performance criteria.

FNB&T established a loan production office (LPO) in south Tulsa, Oklahoma in April 2020. The opening of the LPO has resulted in a higher dollar volume of loans outside the bank's AAs due to higher property values in the Tulsa metro area compared to Okmulgee and Seminole Counties.

Description of Institution

FNB&T is a \$281 million rural community bank located in Okmulgee, Oklahoma. FNB&T is a single-state institution with the main bank facility located in downtown Okmulgee, Oklahoma. The bank is a wholly owned subsidiary of First Okmulgee Corporation, a single bank holding company headquartered at the main bank address. No subsidiaries or affiliates were considered as part of the PE.

The bank has one rating area, the state of Oklahoma, with two AAs. The Okmulgee County AA consists of all of Okmulgee County and is located within the Tulsa Metropolitan Statistical Area (MSA). There are three branch locations in the Okmulgee County AA. The main bank and the Walmart Supercenter branch are located in Okmulgee, Oklahoma, and the Henryetta branch is located in Henryetta, Oklahoma. The Seminole County AA consists of all of Seminole County and is located within the Oklahoma non-MSA. The bank has one branch within the Seminole County AA which is located in downtown Wewoka, Oklahoma. Drive-in services are offered at the main bank, the Henryetta branch, and the Wewoka branch. The bank operates five automated teller machines (ATMs), one at each branch and one additional standalone ATM in Okmulgee, Oklahoma. The bank does not operate any deposit-taking ATMs. In April 2020, FNB&T opened a LPO in Tulsa County which is located in the Tulsa MSA but is outside of the bank's designated AA.

FNB&T offers a variety of loan and deposit products to meet community needs and achieve the bank's overall business strategy. In addition to providing traditional loan and deposit products and services, FNB&T also offers automated telephone banking, mobile banking, and internet banking. As of December 31, 2020, tier 1 capital was approximately \$31 million and net loans totaled \$151 million, or 56.9 percent of total assets. The loan portfolio consists of 55.4 percent commercial loans, 32.6 percent residential real estate loans, 7.1 percent agricultural loans, 4.3 percent consumer loans, and less than 1 percent other loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs within its AAs. A CRA PE was last prepared July 30, 2018, and the bank received an overall rating of Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed full-scope reviews of FNB&T's CRA activities in its AAs under the Small Bank CRA procedures. This includes the lending test, which evaluates the bank's record of meeting the credit needs of the AA through its lending activities.

Conclusions regarding the lending test are based on Home Mortgage Disclosure Act (HMDA) data collected from January 1, 2018 through December 31, 2020 and samples of business loans originated during the same 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 (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 detail 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.

FNB&T has two AAs in the state of Oklahoma. These AAs include the Okmulgee County AA, which includes only Okmulgee County within the Tulsa MSA, and the Seminole County AA, which includes only Seminole County within the Oklahoma non-MSA. The bank's overall rating is based on full-scope reviews of these AAs. There were no Office of Management and Budget (OMB) changes to the bank's AA during the review period.

The 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 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 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 excellent distribution throughout the AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.

Description of Institution's Operations in Oklahoma

FNB&T operates four locations in two AAs within the state of Oklahoma. Three locations are in the Okmulgee County AA, and one location is in the Seminole County AA.

Okmulgee County AA

| Assessment Area: Okmulgee County AA | | | | | | | | | | | | | |
|---|--------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|--|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # | | | | | | | |
| Geographies (Census Tracts) | 10 | 0.0 | 50.0 | 50.0 | 0.0 | 0.0 | | | | | | | |
| Population by Geography | 39,446 | 0.0 | 42.2 | 57.8 | 0.0 | 0.0 | | | | | | | |
| Housing Units by Geography | 17,825 | 0.0 | 44.1 | 55.9 | 0.0 | 0.0 | | | | | | | |
| Owner-Occupied Units by Geography | 10,416 | 0.0 | 35.7 | 64.3 | 0.0 | 0.0 | | | | | | | |
| Occupied Rental Units by Geography | 4,606 | 0.0 | 54.5 | 45.5 | 0.0 | 0.0 | | | | | | | |
| Vacant Units by Geography | 2,803 | 0.0 | 58.3 | 41.7 | 0.0 | 0.0 | | | | | | | |
| Businesses by Geography | 2,208 | 0.0 | 43.1 | 56.9 | 0.0 | 0.0 | | | | | | | |
| Farms by Geography | 138 | 0.0 | 20.3 | 79.7 | 0.0 | 0.0 | | | | | | | |
| Family Distribution by Income Level | 9,714 | 29.0 | 20.9 | 19.1 | 31.0 | 0.0 | | | | | | | |
| Household Distribution by Income Level | 15,022 | 32.6 | 18.9 | 18.2 | 30.4 | 0.0 | | | | | | | |
| Median Family Income MSA - 46140 Tulsa, OK MSA | | \$61,182 | Median Housing V | 'alue | | \$77,854 | | | | | | | |
| | | | Median Gross Ren | | \$600 | | | | | | | | |
| | | | Families Below Po | verty Level | | 15.6% | | | | | | | |

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

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.

The Okmulgee County AA is within the Tulsa MSA and includes all 10 census tracts (CTs) in Okmulgee County. The Okmulgee County AA consists of five moderate-income CTs and five middle-income CTs. There are no low-income or upper-income CTs in the AA. The main bank and the Walmart Supercenter branch are located in a middle-income CT, while the Henryetta branch is located in a moderate-income CT. The Okmulgee County AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

The city of Okmulgee is the county seat for Okmulgee County. Major cities within Okmulgee County include Henryetta, Beggs, Grayson, Dewar, Hoffman, Morris, Schulter, and Winchester. The Muscogee (Creek) Nation is also headquartered in Okmulgee, Oklahoma. The local economy is diversified in the areas of education, services, retail trade, light industrial, manufacturing, and government. The unemployment rate for Okmulgee County was 9.5 percent compared to the state unemployment rate of 3.7 percent as of July 2021.

Competition in the AA is strong and includes several state-chartered banks, branches of non-local banks, several credit unions, and finance companies. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Data, FNB&T's deposit market share in the AA is 33.7 percent. FNB&T is ranked first among six banks in the AA.

We completed one community contact within the AA, a civic service organization, to gain a better understanding of the general community credit needs, as well as, local economic conditions. The community contact indicated that the general economic conditions were stable but there is a need for affordable housing development within the AA.

Seminole County AA

| Table A – Demographic Information of the Assessment Area | | | | | | | | | | | | | |
|--|--------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|--|
| Assessment Area: Seminole County AA | | | | | | | | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # | | | | | | | |
| Geographies (Census Tracts) | 9 | 0.0 | 22.2 | 77.8 | 0.0 | 0.0 | | | | | | | |
| Population by Geography | 25,481 | 0.0 | 23.9 | 76.1 | 0.0 | 0.0 | | | | | | | |
| Housing Units by Geography | 11,662 | 0.0 | 27.8 | 72.2 | 0.0 | 0.0 | | | | | | | |
| Owner-Occupied Units by Geography | 6,671 | 0.0 | 19.3 | 80.7 | 0.0 | 0.0 | | | | | | | |
| Occupied Rental Units by Geography | 2,531 | 0.0 | 38.9 | 61.1 | 0.0 | 0.0 | | | | | | | |
| Vacant Units by Geography | 2,460 | 0.0 | 39.4 | 60.6 | 0.0 | 0.0 | | | | | | | |
| Businesses by Geography | 1,345 | 0.0 | 32.7 | 67.3 | 0.0 | 0.0 | | | | | | | |
| Farms by Geography | 66 | 0.0 | 12.1 | 87.9 | 0.0 | 0.0 | | | | | | | |
| Family Distribution by Income Level | 6,323 | 24.3 | 21.1 | 20.9 | 33.7 | 0.0 | | | | | | | |
| Household Distribution by Income Level | 9,202 | 28.0 | 18.4 | 17.2 | 36.4 | 0.0 | | | | | | | |
| Median Family Income Non-MSAs - OK | | \$51,491 | Median Housing | g Value | | \$68,242 | | | | | | | |
| | | | Median Gross R | lent | | \$529 | | | | | | | |
| Families Below Poverty Level | | | | | | | | | | | | | |

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

The Seminole County AA consists of all nine CTs in Seminole County, Oklahoma. The AA includes two moderate-income CTs and seven middle-income CTs. There are no low-income or upper-income CTs in the AA. FNB&T has one full-service branch, including drive in services, and one ATM in the AA. The Wewoka branch is located in a moderate-income CT. The Seminole County AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

Wewoka is the county seat for Seminole County. Cities within the county include Seminole, Wewoka, Bowlegs, Cromwell, Konowa, Maud, Lima, Wolf, and Sasakwa. The Seminole Nation, a Native American Tribe, is headquartered in Wewoka and has offices in Seminole. Business demographics reflect that employment is centered in the areas of services, retail trade, finance/insurance/real estate, and construction. The unemployment rate for Seminole County was 7.7 percent compared to the state unemployment rate of 3.7 percent as of July 2021.

Competition in the AA is strong and includes several state-chartered banks, branches of non-local banks, several credit unions, and finance companies. According to the FDIC Deposit Market Share Data, FNB&T's deposit market share in the AA is 8.76 percent. FNB&T is ranked fourth among six banks in the AA.

We consulted one community contact, a government entity, who indicated that there is a need for affordable housing and programs for down payment assistance.

Scope of Evaluation in Oklahoma

FNB&T has two AAs in the state of Oklahoma. These AAs include the Okmulgee County AA, which includes only Okmulgee County within the Tulsa MSA, and the Seminole County AA, which includes only Seminole County in the Oklahoma non-MSA. The state rating is based on full-scope reviews of these AAs with slightly more weight given to the Okmulgee County AA which accounts for approximately 84 percent of bank deposits. There are no limited-scope review areas.

Refer to the Scope of Evaluation table in Appendix A for a listing of all bank AAs.

LENDING TEST

The bank's performance under the lending test in Oklahoma is rated **Satisfactory**.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Okmulgee County AA and the Seminole County AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

Okmulgee County AA

There were no low-income CTs in the AA during the evaluation period.

Home Mortgage Loans

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.

The percentage of bank loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate lending in those geographies.

Small Loans to Businesses

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.

The bank's small business lending in moderate-income CTs exceeded both the percentage of businesses and the aggregate lending in those CTs.

Lending Gap Analysis

There were no unexplained conspicuous gaps based on geographic distribution of loans, branch locations, and the performance context.

Seminole County AA

There were no low-income CTs in the AA during the evaluation period.

Home Mortgage Loans

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.

The percentage of bank loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate lending in those geographies.

Small Loans to Businesses

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.

The bank's small business lending in moderate-income CTs exceeded both the percentage of businesses and the aggregate lending in those CTs.

Lending Gap Analysis

There were no unexplained conspicuous gaps based on geographic distribution of loans, branch location, and the performance context. CTs with no lending, based on our samples, are primarily rural areas with little opportunity for home mortgage or commercial lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a 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.

Okmulgee County AA

Home Mortgage Loans

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 and purchases.

The percentage of bank loans to low-income borrowers was somewhat lower than the percentage of low-income families but exceeded the aggregate percentage of lending to those borrowers. The percentage of bank loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate percentage of lending to those borrowers.

Small Loans to Businesses

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.

The percentage of bank loans to businesses with revenues of less than or equal to \$1 million was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for those businesses.

Seminole County AA

Home Mortgage Loans

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 and purchases.

The percentage of bank loans to low-income borrowers exceeded both the percentage of low-income families and the aggregate percentage of lending to those borrowers. The percentage of bank loans to moderate-income borrowers was lower than the percentage of moderate-income families and somewhat lower than the aggregate percentage of lending to those borrowers. Many LMI borrowers in the AA cannot qualify for home mortgages due to lack of credit history or inadequate funds for down payment requirements, and many choose to rent instead of owning property.

Small Loans to Businesses

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.

The percentage of bank loans to businesses with revenues of less than or equal to \$1 million was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for those businesses.

Responses to Complaints

FNB&T 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: | 01/01/2018 to 12/31/2020 | | | | | | | |
|-----------------------------------|--------------------------|---------------------------|--|--|--|--|--|--|
| Bank Products Reviewed: | Home mortgage and small | business | | | | | | |
| | | | | | | | | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed | | | | | | |
| None | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| List of Assessment Arross and Tem | o of Evamination | | | | | | | |
| List of Assessment Areas and Typ | | | | | | | | |
| Rating and Assessment Areas | Type of Exam | Other Information | | | | | | |
| Oklahoma | | | | | | | | |
| Okmulgee County AA | Full-scope | Okmulgee County, Oklahoma | | | | | | |
| Seminole County AA | Full-scope | Seminole County, Oklahoma | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Appendix B: Summary of MMSA and State Ratings

| RATINGS First Nationa | l Bank & Trust Company of Okmulgee |
|-----------------------|------------------------------------|
| Overall Bank: | Lending Test Rating |
| FNB&T | Satisfactory |
| MMSA or 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 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 MMSAs, 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 is compiled by the FDIC and 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 or 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. Aggregate small business data are not available for geographic areas smaller than counties, and 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.
- **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. Aggregate small farm data are not available for geographic areas smaller than counties, and 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2018-20

| | Total Home Mortgage Loans | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
|-----------------------|----------------------------------|--------|-------|-------------------|------------|--------------------|------------------------|--|--------------------|----------------------|--|--------------------|---------------------|--|--------------------|-----------------------------|--|--------------------|-----------|
| Assessment Area: | # | \$ | | Overall Market | (Occupied | % 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 |
| Seminole County AA | 20 | 1,398 | 10.4 | 409 | 0.0 | 0.0 | 0.0 | 19.3 | 55.0 | 13.2 | 80.7 | 45.0 | 86.8 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Okmulgee County AA | 173 | 11,396 | 89.6 | 780 | 0.0 | 0.0 | 0.0 | 35.7 | 50.9 | 21.4 | 64.3 | 49.1 | 78.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 193 | 12,794 | 100.0 | 1,189 | 0.0 | 0.0 | 0.0 | 29.3 | 51.3 | 18.6 | 70.7 | 48.7 | 81.4 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2020 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

2018-20

| | Tota | Total Home Mortgage Loans | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
|-----------------------|------|---------------------------|-------|-------------------|----------------------|--------------------|-----------|---------------------------|--------------------|-----------|-------------------------|--------------------|-----------|------------------------|--------------------|-----------|-----------------------------------|--------------------|-----------|
| Assessment Area: | # | \$ | | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Seminole County AA | 20 | 1,398 | 12.8 | 409 | 24.3 | 33.3 | 6.4 | 21.1 | 9.1 | 14.9 | 20.9 | 29.4 | 22.0 | 33.7 | 40.0 | 33.0 | 0.0 | 23.5 | 23.7 |
| Okmulgee County AA | 173 | 11,396 | 89.6 | 780 | 29.0 | 19.1 | 6.2 | 20.9 | 17.3 | 17.8 | 19.1 | 17.9 | 20.9 | 31.0 | 37.6 | 32.6 | 0.0 | 8.1 | 22.6 |
| Total | 193 | 12,794 | 100.0 | 1,189 | 27.1 | 18.1 | 6.2 | 21.0 | 16.1 | 16.8 | 19.8 | 18.7 | 21.3 | 32.1 | 37.8 | 32.7 | 0.0 | 9.3 | 23.0 |

Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2020 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

2018-20

| | | Total Loans to Small Businesses | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|-----------------------|----|------------------------------------|---------------|-------------------|-------------------|--------------------|-----------|------------------------|--------------------|-----------|----------------------|--------------------|-----------|---------------------|--------------------|-----------|-----------------------------|--------------------|-----------|
| Assessment Area: | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Seminole County AA | 28 | 1,214 | 49.1 | 332 | 0.0 | 0.0 | 0.0 | 32.7 | 67.9 | 26.2 | 67.3 | 32.1 | 73.8 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Okmulgee County AA | 29 | 2,297 | 50.9 | 327 | 0.0 | 0.0 | 0.0 | 43.1 | 65.5 | 36.7 | 56.9 | 34.5 | 63.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total | 57 | 3,511 | 100.0 | 659 | 0.0 | 0.0 | 0.0 | 39.2 | 66.7 | 31.4 | 60.8 | 33.3 | 68.6 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2020 D&B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

| Table D. | A accessment | A | Distribution | of I come to | cmall | Ducinocco | hr. Cua | as Annual Davianuas | |
|----------|--------------|------|--------------|--------------|---------|-------------|---------|---------------------|--|
| Table K: | Assessment | Area | Distribution | ot Loans to | o Smaii | Biisinesses | nv Gro | ss Annual Revenues | |

2018-20

| | 7 | Γotal Loans to S | Small Businesse | es | Businesses | with Revenues | s <= 1MM | Businesses wit 1M | | Businesses with Revenues Not Available | | |
|--------------------|-------------------|------------------|-----------------|-------------------|--------------|-----------------|-----------|----------------------|-----------------|---|-----------------|--|
| Assessment Area: | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| Seminole County AA | 28 | 1,214 | 49.1 | 332 | 77.7 | 75.0 | 61.1 | 5.8 | 7.1 | 16.5 | 17.9 | |
| Okmulgee County AA | 29 | 2,297 | 50.9 | 327 | 82.2 | 75.9 | 43.7 | 3.5 | 10.3 | 14.3 | 13.8 | |
| Total | 57 3,511 100.0 65 | | | | 80.5 | 75.4 | 52.5 | 4.4 | 8.8 | 15.1 | 15.8 | |

Source: 2020 D&B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%