# PUBLIC DISCLOSURE

May 28, 2025

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

West Texas National Bank Charter Number: 24185

#6 Desta Drive, Suite 2400 Midland, TX 79705-5525

Office of the Comptroller of the Currency

5001 West Loop 289 Suite 250 Lubbock, TX 79414

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 following table indicates the performance level of West Texas National Bank with respect to the Lending, Investment, and Service Tests:

|                           | West Texas National Bank Performance Tests |   |   |  |  |  |  |
|---------------------------|--|---|---|--|--|--|--|
| Performance Levels        | Lending Test* Investment Test Service Test |   |   |  |  |  |  |
| Outstanding               |  |   |   |  |  |  |  |
| High Satisfactory         | X  |   |   |  |  |  |  |
| Low Satisfactory          |  | X | X |  |  |  |  |
| Needs to Improve          |  |   |   |  |  |  |  |
| Substantial Noncompliance |  |   |   |  |  |  |  |

<sup>\*</sup>The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the good performance in the Lubbock and Midland MSAs. Lending levels were good. Community development (CD) lending in the Lubbock MSA had a significant positive impact on the overall Lending Test rating.
- The Investment Test rating is based on the adequate performance in the Midland MSA with an adequate level of qualified CD investments and grants. The OCC considered the fact that CD investment opportunities are limited in the remaining assessment areas (AAs) and there has been a relatively short time that WTNB has had a presence in the Lubbock MSA.
- The Service Test rating is based on adequate performance in the Midland MSA. Branch offices and service delivery systems were readily accessible to borrowers and geographies of different income levels. Overall, the bank provided an adequate level of CD services.

#### **Lending in Assessment Area**

A high percentage of the bank's loans are in its assessment areas (AA).

The bank originated and purchased 77 percent of its total loans inside the bank's 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.

| Table 1: Lending Inside and Outside of the Assessment Area |       |  |            |      |           |         |                                 |         |     | 2022-2024    |  |
|--|-------|--|------------|------|-----------|---------|---------------------------------|---------|-----|--------------|--|
|  |       | Numbe  | r of Loans |      |           | Dollar  | Dollar Amount of Loans \$(000s) |         |     |              |  |
| Loan Category  | Ins   | ide  | Out        | side | Tot<br>al | Insi    | Inside                          |         | ide | Total        |  |
|  | #     | %  | #          | %    |           | \$      | %                               | \$      | %   | \$(000<br>s) |  |
| Home Mortgage  | 167   | 52   | 157        | 48   | 324       | 56,832  | 30                              | 134,357 | 70  | 191,189      |  |
| Small Business   | 654   | 88   | 93         | 12   | 747       | 136,484 | 86                              | 22,879  | 14  | 159,363      |  |
| Small Farm   | 190   | 79   | 51         | 21   | 241       | 30,343  | 76                              | 9,450   | 24  | 39,793       |  |
| Total  | 1,011 | 77   | 301        | 23   | 1312      | 223,659 | 57                              | 166,686 | 43  | 390,345      |  |
|  |       | Source: 1/1/2022 – 12/31/2024 Bank Data Due to rounding, totals may not equal 100% |            |      |           |         |                                 |         |     |              |  |

The findings from this analysis factored into the overall analysis of the geographic distribution of lending by income level of geography. The loans inside the bank's AAs were included in the analysis of geographic distribution under the Lending Test.

# **Description of Institution**

West Texas National Bank (WTNB or "the bank") is an intrastate community bank headquartered in Midland, Texas, located in the Permian Basin area of the state. WTNB is a wholly owned subsidiary of First West Texas Bancshares, Inc., a one-bank holding company formed in 2000 through a series of acquisitions and reported total assets of almost \$2.8 billion as of December 31, 2024.

The bank offers traditional loan and deposit products throughout its network. WTNB has 13 full-service branches throughout West Texas, including the Permian Basin, South Plains, and Trans-Pecos areas, as well as three branches in Midland, Texas. Other single-branch locations include the cities of Alpine, Crane, Denver City, Kermit, Odessa, Pecos, Seminole, and Terlingua, Texas. There are 46 automatic teller machines (ATMs) throughout West Texas - 19 at branch locations and 27 at other non-branch locations. WTNB also has three loan production offices (LPOs) in Dallas, Houston, and Lockney, Texas. The Lockney location is also a deposit production office. Bank lobby hours vary by location but are generally Monday through Friday, 9:00 AM to 4:00 PM, with drive-through hours from 8:00 AM to 6:00 PM. Saturday drive-through services are provided at the Midland-Wadley and Alpine branches from 9:00 AM to 1:00 PM and 9:00 AM to 12:00 PM, respectively. WTNB provides 24-hour online banking access to personal and business accounts through its website at www.wtnb.com and mobile app that offers bill pay and mobile deposit capabilities. Online account opening is also available.

WTNB's business strategy is completely correlated to the energy industry. WTNB is primarily a commercial lender, and loan volumes are significantly concentrated on energy lending and other business loans. Energy lending includes exploration and production, reserve-based lending, midstream, and oilfield servicing, and is driven by strong activity in the Permian Basin. Business lending includes commercial and industrial, commercial real estate, construction and development, and agricultural and farmland. WTNB also offers smaller-dollar consumer loans for general and automotive purposes and has a mortgage lending department that offers traditional mortgages, home equity, home improvement, and interim construction loans. The loan portfolio comprises 51 percent of total assets as of December 31, 2024. The portfolio composition is divided among real estate (60 percent), commercial (33 percent), agricultural (6 percent), and consumer (1 percent) loans. The bank maintains \$252 million in tier 1 capital, representing a 9.2 percent tier 1 leverage ratio.

The bank received a satisfactory rating at the April 18, 2022, CRA evaluation. WTNB has no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

# **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

The CRA evaluation period is January 1, 2022, through December 31, 2024. The OCC evaluated WTNB using large bank (LB) CRA performance standards that include the Lending, Investment, and Service tests. In evaluating the lending performance, we reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small business and farm loans reported under the CRA, and CD loans. We also evaluated retail services, qualified investments, and CD services made throughout the evaluation period.

#### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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 section 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 multistate metropolitan area ratings and state ratings.

WTNB has only one rating area, which is the State of Texas. The bank's overall rating is based on full-scope reviews of the Midland and Lubbock metropolitan statistical areas (MSAs) and limited-scope reviews of the Odessa MSA and TX Non-MSA AAs within the state. Commercial loans within each AA received greater weighting as this is the bank's primary loan product. Agricultural and home mortgage loans received additional weighting, while consumer loans were not considered in analysis given low dollar volumes generated.

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those 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 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 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 Texas

**CRA rating for the State of Texas<sup>1</sup>:** Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- WTNB exhibited good geographic distribution and borrower distribution of loans.
- A relatively high level of CD loans that were responsive to identified community needs and having a significantly positive impact on the Lending Test rating.
- WTNB had an adequate level of CD investments and grants.
- WTNB's service delivery systems were readily accessible and provide an adequate level of CD services to geographies and individuals of different income levels in the bank's AA.

<sup>&</sup>lt;sup>1</sup> [This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.]

# **Description of Institution's Operations in Texas**

WTNB is a community bank located in Midland, Texas and is wholly owned by a one-bank holding company, First West Texas Bancshares, Inc. The bank offers traditional loan and deposit products across its 13 full-service branch and 51 deposit taking ATMs throughout the West Texas region. WTNB has designated the following four assessment areas: Midland MSA AA which is comprised of Midland County; Odessa MSA AA which consists solely of Ector County; and the TX Non-MSA combined AA which consists of 13 non-MSA counties in Texas including Brewster, Crane, Reeves, Winkler, Culberson, Jeff Davis, Pecos, Ward, Floyd, Hale, Gaines, Howard, and Yoakum Counties. These assessment areas meet legal requirements as they consist of whole geographies and do not arbitrarily exclude any low- to moderate-income census tracts. While the combined non-MSA AAs includes counties that are not all contiguous, they are very nearly so, are all within the state of Texas, and share regional characteristics. Therefore, the non-MSA counties are combined for AA analysis purposes.

## Midland MSA AA – Midland County

The Midland MSA is the bank's primary AA when considering overall operations, branch network, and lending and deposit levels. The AA consists solely of Midland County, Texas and is comprised of 32 census tracts. The county has two low-income tracts, six moderate-income tracts, 13 middle-income tracts, nine upper-income tracts, and two unclassified-income tracts. Midland is the county seat of Midland County and is the largest city in the county. WTNB's main office and two branches are located in the AA.

Midland is a major center for oil and natural gas production, and the economy relies heavily on the success of the oil and gas industry. The Permian Basin is one of the most productive regions in the world and oil and gas related businesses are the key driver of growth in the region. Economic conditions in the AA are stable to improving. While the oil and gas industry is key to Midland's economic success, aerospace, ranching, agriculture, health care, retirement, and transportation all play critical roles in Midland's diverse economy. Midland's retail service sector is both regionally based and national chain dominated. Unemployment during the review period was highest in January 2022 at 4.4 percent and has since gone down to a low 2.6 percent in December 2024. Midland's unemployment rate was much lower than the state of Texas at 4.2 percent and nationally at 4.1 percent. Median family income ranged from \$118,700 in 2022 to \$91,500 in 2024. Competition in Midland is strong with 15 institutions holding 39 offices. WTNB maintains a strong core deposit base in Midland County holding 12 percent of deposit market share in 2024. Community National Bank, Frost Bank, and Prosperity Bank hold higher deposit market share than WTNB in Midland County.

| Table 2 – Demographic Information of the Assessment Area  Assessment Area: Midland MSA 2022 |         |               |                    |                  |                 |               |  |  |
|---|---------|---------------|--------------------|------------------|-----------------|---------------|--|--|
| Demographic Characteristics   | #       | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |
| Geographies (Census Tracts)   | 37      | 5.4           | 18.9               | 37.8             | 32.4            | 5.4           |  |  |
| Population by Geography   | 169,983 | 6.6           | 16.7               | 45.5             | 30.3            | 1.0           |  |  |
| Housing Units by Geography  | 62,327  | 6.2           | 17.6               | 45.5             | 30.0            | 0.7           |  |  |
| Owner-Occupied Units by Geography   | 38,643  | 5.2           | 16.4               | 42.1             | 35.7            | 0.7           |  |  |
| Occupied Rental Units by Geography  | 19,274  | 7.8           | 17.9               | 54.5             | 19.8            | 0.1           |  |  |

| Vacant Units by Geography                             | 4,410  | 8.8       | 26.6          | 36.4          | 24.3  | 3.9       |
|---|--------|-----------|---------------|---------------|-------|-----------|
| Businesses by Geography                               | 6,399  | 6.6       | 35.4          | 34.0          | 23.1  | 1.0       |
| Farms by Geography                                    | 226    | 1.8       | 40.3          | 31.4          | 26.11 | 0.4       |
| Family Distribution by Income Level                   | 39,642 | 21.6      | 17.3          | 19.2          | 41.9  | 0.0       |
| Household Distribution by Income Level                | 57,917 | 23.8      | 16.1          | 18.5          | 41.7  | 0.0       |
| Median Family Income MSA – 33260 –<br>Midland, TX MSA |        | \$118,700 | Median Housi  | ng Value      |       | \$230,000 |
| ·   |        |           | Median Gross  | \$1,166       |       |           |
|   |        |           | Families Belo | w Poverty Lev | el    | 8.0       |

Source: 2022 ACS Census and 2022 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.

| Table 2 – Dem                                      | ographic In | formation     | of the Assessm     | ent Area         |                 |               |
|--|-------------|---------------|--------------------|------------------|-----------------|---------------|
| Ass  | sessment Ar | ea: Midlan    | d MSA 2023         |                  |                 |               |
| Demographic Characteristics                        | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                        | 37          | 5.4           | 18.9               | 37.8             | 32.4            | 5.4           |
| Population by Geography                            | 169,983     | 6.6           | 16.7               | 45.5             | 30.3            | 1.0           |
| Housing Units by Geography                         | 62,327      | 6.2           | 17.6               | 45.5             | 30.0            | 0.7           |
| Owner-Occupied Units by Geography                  | 38,643      | 5.2           | 16.4               | 42.1             | 35.7            | 0.7           |
| Occupied Rental Units by Geography                 | 19,274      | 7.8           | 17.9               | 54.5             | 19.8            | 0.1           |
| Vacant Units by Geography                          | 4,410       | 8.8           | 26.6               | 36.4             | 24.3            | 3.9           |
| Businesses by Geography                            | 9,943       | 4.2           | 23.7               | 33.8             | 37.2            | 1.1           |
| Farms by Geography                                 | 359         | 0.8           | 27.0               | 24.2             | 46.2            | 1.7           |
| Family Distribution by Income Level                | 39,642      | 21.6          | 17.3               | 19.2             | 41.9            | 0.0           |
| Household Distribution by Income Level             | 57,917      | 23.8          | 16.1               | 18.5             | 41.7            | 0.0           |
| Median Family Income MSA – 33260 – Midland, TX MSA |             | \$105,500     | Median Housi       | ng Value         |                 | \$230,000     |
|  |             |               | Median Gross       | Rent             |                 | \$1,166       |
|  |             |               | Families Belov     | w Poverty Lev    | el              | 8.0           |

Source: 2023 ACS Census and 2023 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.

| Table 2 – Demographic Information of the Assessment Area |         |               |                    |                  |                 |               |  |
|--|---------|---------------|--------------------|------------------|-----------------|---------------|--|
| Assessment Area: Midland MSA 2024                        |         |               |                    |                  |                 |               |  |
| Demographic Characteristics                              | #       | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |
| Geographies (Census Tracts)                              | 37      | 5.4           | 18.9               | 37.8             | 32.4            | 5.4           |  |
| Population by Geography                                  | 169,983 | 6.6           | 16.7               | 45.5             | 30.3            | 1.0           |  |
| Housing Units by Geography                               | 62,327  | 6.2           | 17.6               | 45.5             | 30.0            | 0.7           |  |

| Owner-Occupied Units by Geography                  | 38,643 | 5.2      | 16.4          | 42.1         | 35.7 | 0.7     |
|--|--------|----------|---------------|--------------|------|---------|
| Occupied Rental Units by Geography                 | 19,274 | 7.8      | 17.9          | 54.545       | 19.8 | 0.1     |
| Vacant Units by Geography                          | 4,410  | 8.8      | 26.6          | 36.4         | 24.3 | 3.9     |
| Businesses by Geography                            | 9,850  | 4.3      | 24.4          | 34.1         | 36.1 | 1.2     |
| Farms by Geography                                 | 356    | 0.8      | 26.4          | 25.8         | 45.2 | 1.7     |
| Family Distribution by Income Level                | 39,642 | 21.6     | 17.3          | 19.2         | 41.9 | 0.0     |
| Household Distribution by Income Level             | 57,917 | 23.8     | 16.1          | 18.5         | 41.7 | 0.0     |
| Median Family Income MSA – 33260 – Midland, TX MSA |        | \$91,500 | Median Hous   | \$230,000    |      |         |
| Median Gross Rent                                  |        |          |               |              |      | \$1,166 |
|  |        |          | Families Belo | w Poverty Le | vel  | 8.0     |

Source: 2024 ACS Census and 2024 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.

## Odessa MSA AA – Ector County

WTNB entered the Odessa market in October 2018 with an LPO. In June 2019, the LPO was converted to a small, full-service branch. In order to be more competitive in the Odessa market, WTNB secured a larger space to renovate and relocated the branch in May 2021. Since then, the branch has provided the bank with both loan and deposit growth. The AA consists solely of Ector County, Texas and is comprised of 33 census tracts. The county has 10 moderate-income tracts, 14 middle-income tracts, and nine upper-income tracts. Odessa is the county seat of Ector County and is the largest city in the county. WTNB has one branch located in the AA.

Odessa's economy is primarily driven by the oil and gas industry in the area, as it is situated just above the Permian Basin. Outside of education, government, and healthcare industries, the city's major employers are concentrated in the oil and gas industry. Many major employers are oilfield supply companies and petrochemical processing companies. Unemployment during the review period was highest in January 2022 at 5.3 percent and has since gone down to 3.2 percent in December 2024. Odessa's unemployment rate was much lower than the state of Texas at 4.2 percent and nationally at 4.1 percent. Median family income ranged from \$92,700 in 2022 to \$82,000 in 2024. Competition in Odessa is strong with 16 institutions holding 36 offices. WTNB has a relatively small deposit market share in AA at 0.5 percent in 2024, ranking 16<sup>th</sup>.

| Table 2 – Demographic Information of the Assessment Area |         |               |                    |                  |                 |               |  |  |
|--|---------|---------------|--------------------|------------------|-----------------|---------------|--|--|
| Assessment Area: Odessa MSA 2022                         |         |               |                    |                  |                 |               |  |  |
| Demographic Characteristics                              | #       | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |
| Geographies (Census Tracts)                              | 33      | 0.0           | 30.3               | 42.4             | 27.3            | 0.0           |  |  |
| Population by Geography                                  | 165,171 | 0.0           | 26.0               | 43.7             | 30.3            | 0.0           |  |  |
| Housing Units by Geography                               | 59,155  | 0.0           | 29.0               | 41.8             | 29.2            | 0.0           |  |  |
| Owner-Occupied Units by Geography                        | 35,106  | 0.0           | 25.2               | 44.7             | 30.1            | 0.0           |  |  |
| Occupied Rental Units by Geography                       | 18,496  | 0.0           | 34.7               | 36.2             | 29.1            | 0.0           |  |  |

| Vacant Units by Geography                         | 5,553  | 0.0      | 34.4        | 41.8      | 23.9 | 0.0       |
|---|--------|----------|-------------|-----------|------|-----------|
| Businesses by Geography                           | 4,906  | 0.0      | 35.8        | 38.1      | 26.1 | 0.0       |
| Farms by Geography                                | 84     | 0.0      | 25.0        | 35.7      | 39.3 | 0.0       |
| Family Distribution by Income Level               | 36,914 | 22.9     | 18.2        | 17.2      | 41.7 | 0.0       |
| Household Distribution by Income Level            | 53,602 | 23.9     | 16.1        | 17.7      | 42.3 | 0.0       |
| Median Family Income MSA – 36220 – Odessa, TX MSA |        | \$92,700 | Median Hous | ing Value |      | \$137,600 |
| Median Gross Rent                                 |        |          |             |           |      |           |
|   |        |          |             |           |      | 10.2      |

Source: 2022 ACS Census and 2022 D&B Data Due to rounding, totals may not equal 100.0

Table 2 - Demographic Information of the Assessment Area Assessment Area: Odessa MSA 2023 Low Moderate Middle Upper NA\* **Demographic Characteristics** # % of # Geographies (Census Tracts) 33 0.00 30.3 42.4 27.3 0.0 165,171 Population by Geography 0.00 26.0 43.7 30.3 0.0 59,155 0.00 29.0 41.8 29.2 0.0 Housing Units by Geography Owner-Occupied Units by Geography 35,106 0.00 25.2 44.7 30.1 0.0 18,496 0.00 34.7 36.2 29.1 0.0 Occupied Rental Units by Geography 0.0 Vacant Units by Geography 5,553 0.00 34.4 41.8 23.9 26.1 40.1 33.8 0.0 6,181 0.00 Businesses by Geography Farms by Geography 117 0.00 18.0 34.2 47.9 0.0 18.2 Family Distribution by Income Level 36,914 22.9 17.2 41.7 0.0 23.9 42.3 Household Distribution by Income Level 53,602 16.1 17.7 0.0 Median Family Income MSA – 36220 – \$70,000 Median Housing Value \$137,600 Odessa, TX MSA Median Gross Rent \$1,078 Families Below Poverty Level 10.2

Source: 2023 ACS Census and 2023 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

| Table 2 – Demographic Information of the Assessment Area                                   |         |      |      |      |      |     |  |
|--|---------|------|------|------|------|-----|--|
| Assessment Area: Odessa MSA 2024   |         |      |      |      |      |     |  |
| Demographic Characteristics # Low Moderate % of # Widdle Upper % of # % of # % of # % of # |         |      |      |      |      |     |  |
| Geographies (Census Tracts)  | 33      | 0.00 | 30.3 | 42.4 | 27.3 | 0.0 |  |
| Population by Geography  | 165,171 | 0.00 | 26.0 | 43.7 | 30.3 | 0.0 |  |

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

| Housing Units by Geography                        | 59,155        | 0.00     | 29.0              | 41.8      | 29.2 | 0.0       |
|---|---------------|----------|-------------------|-----------|------|-----------|
| Owner-Occupied Units by Geography                 | 35,106        | 0.00     | 25.2              | 44.7      | 30.1 | 0.0       |
| Occupied Rental Units by Geography                | 18,496        | 0.00     | 34.7              | 36.2      | 29.1 | 0.0       |
| Vacant Units by Geography                         | 5,553         | 0.00     | 34.4              | 41.8      | 23.9 | 0.0       |
| Businesses by Geography                           | 6,184         | 0.00     | 26.5              | 39.4      | 34.1 | 0.0       |
| Farms by Geography                                | 114           | 0.00     | 17.5              | 35.1      | 47.4 | 0.0       |
| Family Distribution by Income Level               | 36,914        | 22.9     | 18.2              | 17.2      | 41.7 | 0.0       |
| Household Distribution by Income Level            | 53,602        | 23.9     | 16.1              | 17.7      | 42.3 | 0.0       |
| Median Family Income MSA – 36220 – Odessa, TX MSA |               | \$91,500 | Median Hous       | ing Value |      | \$230,000 |
|   |               |          | Median Gross Rent |           |      |           |
|   | Families Belo | 8.0      |                   |           |      |           |

Source: 2024 ACS Census and 2024 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.

#### Lubbock MSA AA

WTNB entered the Lubbock AA 2023 with one branch. Lending products in this AA is focused on traditional commercial and industrial, commercial construction, and 1-4 family construction lending. Notably, more than 15 percent of WTNB's loan volume now arises from Lubbock. Lubbock's economy is driven by industries including agribusiness, education, food processing, health services, and information technology. Unemployment during the review period was highest in January 2023 at 3.7 percent and has since gone down to 3.1 percent in December 2024. Lubbock's unemployment rate was much lower than the state of Texas at 4.2 percent and nationally at 4.1 percent. Median family income ranged from \$84,300 in 2023 to \$83,700 in 2024. Competition in Lubbock is strong with 27 institutions holding 107 offices. WTNB has a relatively small deposit market share in AA at 0.10 percent in 2024, ranking 26<sup>th</sup>.

| Table 2 – Dem                          | ographic In | formation (   | of the Assessn     | nent Area        |                 |               |  |  |  |  |  |  |
|--|-------------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|
| Assessment Area: Lubbock MSA 2023      |             |               |                    |                  |                 |               |  |  |  |  |  |  |
| Demographic Characteristics            | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (Census Tracts)            | 106         | 7.6           | 19.8               | 41.5             | 24.5            | 6.6           |  |  |  |  |  |  |
| Population by Geography                | 310,639     | 6.8           | 19.3               | 41.7             | 28.1            | 4.1           |  |  |  |  |  |  |
| Housing Units by Geography             | 129,032     | 8.3           | 21.9               | 41.6             | 25.4            | 2.8           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography      | 64,803      | 4.6           | 16.3               | 41.9             | 36.1            | 1.1           |  |  |  |  |  |  |
| Occupied Rental Units by Geography     | 51,732      | 11.9          | 27.9               | 41.4             | 14.2            | 4.6           |  |  |  |  |  |  |
| Vacant Units by Geography              | 12,497      | 12.5          | 26.0               | 40.5             | 16.6            | 4.4           |  |  |  |  |  |  |
| Businesses by Geography                | 13,853      | 4.3           | 16.4               | 37.2             | 39.9            | 2.2           |  |  |  |  |  |  |
| Farms by Geography                     | 777         | 2.8           | 10.9               | 39.9             | 45.8            | 0.5           |  |  |  |  |  |  |
| Family Distribution by Income Level    | 70,197      | 22.7          | 16.4               | 19.4             | 41.5            | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level | 116,535     | 25.1          | 15.2               | 16.7             | 43.0            | 0.0           |  |  |  |  |  |  |

| Median Family Income MSA – 31180 –<br>Lubbock, TX MSA | \$84,300 | Median Housing Value         | \$131,250 |
|---|----------|------------------------------|-----------|
|   |          | Median Gross Rent            | \$941     |
|   |          | Families Below Poverty Level | 11.2      |
| G 4040 LGG G L4040 D 4 D D                            |          |                              |           |

Source: 2023 ACS Census and 2023 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

| Table 2 – Dem   | ographic In | formation     | of the Assessm     | ient Area        |                 |               |  |  |  |  |  |  |
|---|-------------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|
| Assessment Area: Lubbock MSA 2024                     |             |               |                    |                  |                 |               |  |  |  |  |  |  |
| Demographic Characteristics                           | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (Census Tracts)                           | 106         | 6.6           | 20.8               | 41.5             | 24.5            | 6.6           |  |  |  |  |  |  |
| Population by Geography                               | 310,639     | 5.8           | 20.3               | 41.7             | 28.1            | 4.1           |  |  |  |  |  |  |
| Housing Units by Geography                            | 129,032     | 7.3           | 22.9               | 41.6             | 25.4            | 2.8           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography                     | 64,803      | 3.9           | 17.1               | 41.9             | 36.1            | 1.1           |  |  |  |  |  |  |
| Occupied Rental Units by Geography                    | 51,732      | 10.7          | 29.1               | 41.4             | 14.2            | 4.6           |  |  |  |  |  |  |
| Vacant Units by Geography                             | 12,497      | 10.9          | 27.6               | 40.5             | 16.6            | 4.4           |  |  |  |  |  |  |
| Businesses by Geography                               | 10,818      | 3.8           | 18.2               | 36.7             | 39.0            | 2.4           |  |  |  |  |  |  |
| Farms by Geography                                    | 658         | 2.0           | 11.1               | 42.6             | 43.9            | 0.5           |  |  |  |  |  |  |
| Family Distribution by Income Level                   | 70,197      | 22.2          | 16.2               | 19.3             | 42.3            | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level                | 116,535     | 25.0          | 15.2               | 16.7             | 43.2            | 0.0           |  |  |  |  |  |  |
| Median Family Income MSA – 31180 –<br>Lubbock, TX MSA |             | \$83,700      | Median Housi       | ng Value         |                 | \$131,250     |  |  |  |  |  |  |
| _   |             | Median Gross  | \$941              |                  |                 |               |  |  |  |  |  |  |
|   |             |               | Families Belo      | w Poverty Lev    | /el             | 11.2          |  |  |  |  |  |  |

Source: 2024 ACS Census and 2024 D&B Data Due to rounding, totals may not equal 100.0

# TX Non-MSA – Brewster, Crane, Reeves, Winkler, Culberson, Jeff Davis, Pecos, Ward, Floyd, Hale, Gaines, Howard, and Yoakum Counties.

WTNB has a robust network of rural branches that comprise the bank's West Texas Division. The West Texas Division is spread out over a large geographic region of relatively low population density. Historically, the primary function of these branches is to boost total deposit growth. Branches in these rural areas continue to excel in their markets and maintain a strong presence. The AA, referred to in this report as the TX Non-MSA, includes non-MSA counties within the bank's West Texas footprint. The AA consists of 13 non-MSA counties in Texas including Brewster, Crane, Reeves, Winkler, Culberson, Jeff Davis, Pecos, Ward, Floyd, Hale, Gaines, Howard, and Yoakum Counties. While the combined non-MSA AA includes counties that are not all contiguous, they are very nearly so and share regional characteristics. The combined AA is comprised of 48 census tracts. The AA has one low-income tract, seven moderate-income tracts, 26 middle-income tracts, 13 upper-income tracts, and one unclassified-

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

income tract. WTNB has eight branches located in this AA. Additionally, deposit taking ATMs are dispersed throughout the combined AA counties.

The bank's primary lending strategy in the combined AAs is to provide commercial, agricultural, and consumer products to the AA. WTNB's oldest core competency is Agribusiness lending, consisting primarily of row crop and cattle financing. The dominant crop in the region is cotton, followed by peanuts, wheat, and other crops. The majority of the bank's agricultural lending occurs in Gaines and Yoakum Counties through the Seminole and Denver City branches. WTNB's agricultural lending focus is farm and ranch land loans, farm equipment and dealer loans, and crop production loans to a lesser degree. Commercial lending by dollar and consumer lending by number are the most prevalent in the Trans-Pecos Region, which includes the cities of Alpine, Crane, Kermit, Pecos, and Terlingua. WTNB's consumer lending focus is on personal lines and installment loans, as well as direct auto loans.

| Table 2 – Demo                          | ographic In | formation     | of the Assessm     | ent Area         |                 |               |  |  |  |  |  |  |
|---|-------------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|
| Assessment Area: TX Non-MSA 2022        |             |               |                    |                  |                 |               |  |  |  |  |  |  |
| Demographic Characteristics             | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (Census Tracts)             | 39          | 2.6           | 15.4               | 48.7             | 30.8            | 2.6           |  |  |  |  |  |  |
| Population by Geography                 | 137,335     | 1.2           | 12.4               | 49.6             | 36.4            | 0.4           |  |  |  |  |  |  |
| Housing Units by Geography              | 54,096      | 1.5           | 12.2               | 51.1             | 35.3            | 0.0           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography       | 32,326      | 1.3           | 11.5               | 49.5             | 37.7            | 0.0           |  |  |  |  |  |  |
| Occupied Rental Units by Geography      | 12,500      | 1.8           | 10.6               | 49.9             | 37.7            | 0.0           |  |  |  |  |  |  |
| Vacant Units by Geography               | 9,270       | 1.7           | 16.6               | 58.2             | 23.5            | 0.0           |  |  |  |  |  |  |
| Businesses by Geography                 | 4,106       | 1.3           | 11.9               | 46.9             | 39.9            | 0.0           |  |  |  |  |  |  |
| Farms by Geography                      | 303         | 0.0           | 5.6                | 55.5             | 38.9            | 0.0           |  |  |  |  |  |  |
| Family Distribution by Income Level     | 30,272      | 20.2          | 15.1               | 18.5             | 46.2            | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level  | 44,826      | 22.78         | 13.7               | 15.9             | 47.7            | 0.0           |  |  |  |  |  |  |
| Median Family Income MSA – Non-MSA - TX |             | \$68,800      | Median Housi       | ng Value         |                 | \$89,000      |  |  |  |  |  |  |
|   |             |               | Median Gross       | Rent             |                 | \$766         |  |  |  |  |  |  |
|   |             |               | Families Belov     | w Poverty Lev    | rel             | 11.8          |  |  |  |  |  |  |

Source: 2022 ACS Census and 2022 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.

| Table 2 – Demographic Information of the Assessment Area Assessment Area: TX Non-MSA 2023         |         |     |      |      |      |     |  |  |  |  |  |
|---|---------|-----|------|------|------|-----|--|--|--|--|--|
| Demographic Characteristics # Low   Moderate   Middle   Upper   NA*   % of # % of # % of # % of # |         |     |      |      |      |     |  |  |  |  |  |
| Geographies (Census Tracts)   | 39      | 2.6 | 15.4 | 48.7 | 30.8 | 2.6 |  |  |  |  |  |
| Population by Geography   | 137,335 | 1.2 | 12.4 | 49.6 | 36.4 | 0.4 |  |  |  |  |  |
| Housing Units by Geography  | 54,096  | 1.5 | 12.2 | 51.1 | 35.3 | 0.0 |  |  |  |  |  |
| Owner-Occupied Units by Geography   | 32,326  | 1.3 | 11.5 | 49.5 | 37.7 | 0.0 |  |  |  |  |  |

| Occupied Rental Units by Geography      | 12,500        | 1.8      | 10.6        | 49.9      | 37.7 | 0.0      |
|---|---------------|----------|-------------|-----------|------|----------|
| Vacant Units by Geography               | 9,270         | 1.7      | 16.6        | 58.2      | 23.5 | 0.0      |
| Businesses by Geography                 | 4,314         | 1.1      | 13.3        | 45.7      | 39.9 | 0.0      |
| Farms by Geography                      | 367           | 0.0      | 6.5         | 56.4      | 37.1 | 0.0      |
| Family Distribution by Income Level     | 30,272        | 20.2     | 15.1        | 18.5      | 46.2 | 0.0      |
| Household Distribution by Income Level  | 44,826        | 22.8     | 13.7        | 15.9      | 47.7 | 0.0      |
| Median Family Income MSA – Non-MSA - TX |               | \$73,200 | Median Hous | ing Value |      | \$89,000 |
|   | Median Gross  |          | \$766       |           |      |          |
|   | Families Belo | 11.8     |             |           |      |          |

Source: 2023 ACS Census and 2023 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.

| Table 2 – Demo                          | ographic In | formation (   | of the Assessm     | ent Area         |                 |               |  |  |  |  |  |  |
|---|-------------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|
| Assessment Area: TX Non-MSA 2024        |             |               |                    |                  |                 |               |  |  |  |  |  |  |
| Demographic Characteristics             | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (Census Tracts)             | 48          | 2.1           | 14.6               | 54.2             | 27.1            | 2.1           |  |  |  |  |  |  |
| Population by Geography                 | 169,857     | 1.0           | 12.3               | 53.0             | 33.4            | 0.4           |  |  |  |  |  |  |
| Housing Units by Geography              | 67,478      | 1.2           | 12.0               | 54.3             | 32.5            | 0.0           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography       | 39,216      | 1.1           | 11.3               | 53.3             | 34.4            | 0.0           |  |  |  |  |  |  |
| Occupied Rental Units by Geography      | 16,498      | 1.3           | 11.5               | 52.0             | 35.2            | 0.0           |  |  |  |  |  |  |
| Vacant Units by Geography               | 11,764      | 1.4           | 15.1               | 61.3             | 22.2            | 0.0           |  |  |  |  |  |  |
| Businesses by Geography                 | 5,286       | 0.9           | 12.0               | 50.1             | 37.0            | 0.0           |  |  |  |  |  |  |
| Farms by Geography                      | 532         | 0.0           | 5.6                | 64.5             | 30.0            | 0.0           |  |  |  |  |  |  |
| Family Distribution by Income Level     | 37,881      | 20.7          | 15.5               | 19.3             | 44.5            | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level  | 55,714      | 23.5          | 14.4               | 16.6             | 45.5            | 0.0           |  |  |  |  |  |  |
| Median Family Income MSA – Non-MSA - TX |             | \$75,500      | Median Housi       | ng Value         |                 | \$87,250      |  |  |  |  |  |  |
|   |             |               | Median Gross       | Rent             |                 | \$739         |  |  |  |  |  |  |
|   |             |               | Families Belov     | w Poverty Lev    | el              | 12.3          |  |  |  |  |  |  |

Source: 2024 ACS Census and 2024 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.

## **Community Contacts**

To help identify needs and opportunities in the AAs, the OCC contacted two organizations that focus on economic development, community service, and housing programs in the Lubbock MSA and Midland MSA. Both contacts stated that their respective economies continue to grow, although at a slowed pace. Neither contact identified specific credit needs within the AAs. General needs continue to be affordable housing and small business support for economic and community development. The Lubbock contact

noted that many businesses are reluctant to pursue new projects until the uncertainty of tariff impact is lessened. Local banks are active in the communities, offering credit assistance and remaining highly visible in community involvement activities.

# **Scope of Evaluation in Texas**

The evaluation period for the Lending Test, Investment Test, and Service Test is January 1, 2022, through December 31, 2024.

We conducted full-scope analyses of the Lubbock MSA and Midland MSA and limited-scope analyses of the Odessa MSA and TX Non-MSA AAs. The Lubbock and Midland MSAs were chosen for full-scope reviews as these represented the markets with most deposit shares and commercial lending activity, which is the bank's primary lending focus. Greater weighting was placed on the Lending Test, with generally equal emphasis placed on the geographic distribution of loans and lending by borrower income level.

# **Conclusions in Respect to Performance Tests in Texas**

# **Lending Test**

The bank's performance under the Lending Test in Texas is rated High Satisfactory.

# **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Midland MSA is good.

Based on a full-scope review, the bank's performance in the Lubbock MSA is adequate.

# **Lending Activity**

Lending levels reflect good responsiveness to AA credit needs.

| Table 3: Lend | ing Activity |          |       |             |       |        | 2022-2024 |
|---------------|--------------|----------|-------|-------------|-------|--------|-----------|
|               |              |          |       |             |       |        |           |
| Number of Lo  | ans*         |          |       |             |       |        |           |
| Assessment    | Home         | Small    | Small | Community   |       | %State | %State    |
| Area          | Mortgage     | Business | Farm  | Development | Total | Loans  | Deposits  |
| Lubbock       | 33           | 140      | 2     | 6           | 181   | 17.4   | 0.5       |
| MSA           |              |          |       |             |       |        |           |
| Midland       | 49           | 280      | 3     | 7           | 339   | 32.5   | 51.1      |
| MSA           |              |          |       |             |       |        |           |
| Odessa        | 5            | 34       | 0     | 8           | 47    | 4.5    | 0.8       |
| MSA           |              |          |       |             |       |        |           |
| TX Non-       | 80           | 200      | 185   | 11          | 476   | 45.6   | 47.6      |
| MSA           |              |          |       |             |       |        |           |
| Total         | 167          | 654      | 190   | 32          | 1,043 | 100    | 100       |

| Dollar Volume | Dollar Volume of Loans* |          |        |             |         |        |          |  |  |  |  |  |
|---------------|-------------------------|----------|--------|-------------|---------|--------|----------|--|--|--|--|--|
| Assessment    | Home                    | Small    | Small  | Community   |         | %State | %State   |  |  |  |  |  |
| Area          | Mortgage                | Business | Farm   | Development | Total   | Loans  | Deposits |  |  |  |  |  |
| Lubbock       | 18,830                  | 47,576   | 399    | 29,719      | 96,524  | 36.8   | 0.5      |  |  |  |  |  |
| MSA           |                         |          |        |             |         |        |          |  |  |  |  |  |
| Midland       | 18,694                  | 56,079   | 465    | 2,200       | 77,438  | 29.5   | 51.1     |  |  |  |  |  |
| MSA           |                         |          |        |             |         |        |          |  |  |  |  |  |
| Odessa        | 1,426                   | 8,278    | 0      | 1,900       | 11,604  | 4.4    | 0.8      |  |  |  |  |  |
| MSA           |                         |          |        |             |         |        |          |  |  |  |  |  |
| TX Non-       | 17,883                  | 24,551   | 29,479 | 4,700       | 76,613  | 29.2   | 47.6     |  |  |  |  |  |
| MSA           |                         |          |        |             |         |        |          |  |  |  |  |  |
| Total         | 56,833                  | 136,484  | 30,343 | 38,519      | 262,179 | 100    | 100      |  |  |  |  |  |

<sup>\*</sup>The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

WTNB's lending levels within the Lubbock MSA and Midland MSA reflected good responsiveness to AA credit needs. Most small business lending and CD loans were originated within these markets, reflective of the bank's primary lending focus. While deposit market shares in the Lubbock MSA and Midland MSA are low at 10 and 12 percent, respectively, numerous opportunities were available to supplement lending levels in the AA. Competition remains high in both AAs, comprised of small and midsize community banks along with large financial institution branches as well.

## Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

## Home Mortgage Loans

Refer to Table O in the state of Texas 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.

#### Midland MSA

The distribution of the bank's home mortgage loans in low- and moderate-income geographies is excellent. WTNB's originations significantly exceeded the aggregate number of loans made in moderate-income tracts for 2022, 2023, and 2024. Performance was in line with demographic values for low- and moderate-income tracts for each year, with significantly greater performance in moderate income areas for 2024. The AA only contains two low-income tracts located within Midland's commercial and industrial downtown, resulting in low penetrations shown in Table O.

#### Odessa MSA

The bank did not originate a sufficient volume of loans in this AA to conduct a meaningful analysis during the evaluation period.

#### Lubbock MSA

The Lubbock Branch did not become operational until mid-2023. The distribution of the bank's home mortgage loans in low- and moderate-income geographies for 2023 is excellent. Originations

significantly exceeded both the demographic and aggregate measures for both low- and moderate-income tracts. There were not enough originations to conduct meaningful analysis for 2024.

#### TX Non-MSA

The distribution of the bank's home mortgage loans in low- and moderate income for 2022 and 2023 is reasonable while 2024 distribution is poor. Originations were below demographic measures for all three years but exceeded the aggregate in 2022 and 2023 for moderate income tracts. Home mortgage loan originations for 2024 fell below both demographic and aggregate measures. Home mortgages are not a primary loan product in the bank's rural branch locations spread throughout this AA.

#### Small Loans to Businesses

Refer to Table Q in the state of Texas 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.

# Midland MSA

The distribution of the bank's small loans to businesses in low- and moderate-income geographies is excellent. The bank's percentage of loans to small businesses within moderate-income tracts was significantly above the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders for all three years of the evaluation. Lending within low-income tracts was consistent with demographic and aggregate lending data. The two sole low-income tracts are located in downtown Midland, greatly limiting opportunities.

#### Odessa MSA

The bank did not originate a sufficient volume of loans in this AA to conduct a meaningful analysis during the evaluation period.

#### Lubbock MSA

The distribution of the bank's small loans to businesses in low- and moderate-income geographies is reasonable. The Lubbock Branch did not become operational until mid-2023, limiting opportunities to lend within low- and moderate-income areas in 2023. The bank had adequate geographic penetration in 2024, with the percentage of small business lending within low-income areas exceeding the percentage of small businesses within the AA and aggregate percentage of reporting lenders. Lending in moderate-income areas was low.

#### TX Non-MSA

The distribution of the bank's small loans to businesses in low- and moderate-income geographies is poor. The bank's percentage of loans to small businesses in low- and moderate-income areas fell below the percentage of small businesses and the aggregate percentage of reporting lenders for all three years. Factors impacting performance include low- and moderate-tracts falling within residential areas and bank focus on small farm lending within the rural areas that make up this AA.

#### Small Loans to Farms

Refer to Table S in the state of Texas 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 farms.

The OCC did not perform analysis of the geographic distribution for small loans to farms as only the TX Non-MSA had enough originations to provide meaningful analysis. Additionally, there were no low-income tracts within this AA, and moderate-income tracts were very limited and primarily focused in residential and industrial areas of communities.

## Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses and farms by reviewing maps of loan originations and purchases throughout the AA. The analysis did not identify any unexplained, conspicuous gaps.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

#### Home Mortgage Loans

Refer to Table P in the state of Texas 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.

#### Midland MSA

The distribution of the bank's home mortgage loans to low- and moderate-income borrowers is poor. The bank significantly lagged both the demographic and aggregate measures in 2022. There were not enough originations in 2023 and 2024 to conduct meaningful analysis.

#### Odessa MSA

The bank did not originate a sufficient volume of loans in this AA to conduct a meaningful analysis during the evaluation period.

#### Lubbock MSA

The bank did not originate home mortgage loans to low- and moderate-income borrowers in 2022 and origination volume for 2024 was too low to conduct meaningful analysis. Additionally, in 2023, the bank originated 96 percent of home mortgage loans to individuals with no available income-information.

#### TX Non-MSA

The distribution of the bank's home mortgage loans to low- and moderate-income borrowers is reasonable for 2022 and 2023. The bank's home mortgage originations to low- and moderate-income borrowers for 2024 is poor. The bank's originations to moderate-income individuals exceeded the

aggregate in both 2022 and 2023. Originations lagged both the demographic and aggregate measures in 2024. As noted, home mortgages do not represent the bank's primary lending focus in this AA.

#### Small Loans to Businesses

Refer to Table R in the state of **Texas** section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### Midland MSA

The distribution of the bank's small loans to businesses by revenue is good for 2022 and 2023. The distribution of the bank's small loans to businesses by revenue for 2024 is excellent. The bank's percentage of loans to small businesses was greater than the aggregate percentage of all reporting lenders for each year. The bank's percentage was significantly greater than the aggregate for 2024.

#### Odessa MSA AA

The bank did not originate a sufficient volume of loans in this AA to conduct a meaningful analysis during the evaluation period.

#### Lubbock MSA

The distribution of the bank's small loans to businesses by revenue is poor. The bank's percentage of loans to small businesses was significantly less than the percentage of small businesses within the AA and the aggregate percentage of all reporting lenders for both years. The main cause of the poor performance was the bank's purchase of a commercial loan portfolio during this time that was more heavily weighted towards larger businesses.

#### TX Non-MSA

The distribution of the bank's small loans to businesses by revenue is excellent. The bank's percentage of loans to small businesses significantly exceeded both the percentage of small businesses within the AA and the aggregate percentage of all reporting lenders for all three years.

#### Small Loans to Farms

Refer to Table T in the state of **Texas** 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 Midland MSA, Odessa MSA, and Lubbock MSA each did not have enough small farm loans originated during the evaluation period to perform meaningful analysis.

#### TX Non-MSA

The bank's distribution of small loans to farms by revenue is excellent. The bank's percentage of loans to small farms significantly exceeded both the percentage of small farms within the AA and the aggregate percentage of all reporting lenders for 2022. The percentage significantly exceeded the aggregate in all three years and was slightly less than the percentage of small farms in 2023 and 2024.

The addition of a branch and LPOs in the South Plains market at the end of 2023 impacted performance in comparison to demographic measures.

# **Community Development Lending**

The institution has made a relatively high level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

#### Lubbock MSA

WTNB has made a relatively high level of CD loans and had a significantly positive impact on the Lending Test in the Lubbock MSA. WTNB made six CD loans totaling \$29.7 million, which represented 12 percent of tier 1 capital. CD loans were responsive to identified community needs. Examples of CD loans in the AA include:

- Three loans totaling \$9.6 million to develop real estate and build reasonably priced apartment complexes in in low-income and moderate-income areas.
- One loan totaling \$7.9 million to refinance a shopping center in a middle-income area to increase job opportunities and stimulate the economy.
- One loan totaling \$7.9 million to establish a pharmacy in a moderate-income area to provide access to healthcare resources.
- One loan totaling \$4.2 million to develop real estate and build a car wash to create job opportunities and economic activity in the area.

#### Midland MSA

The level of CD lending is adequate. WTNB made seven CD loans totaling \$2.2 million, which represented 0.9 percent of tier 1 capital. Six loans to local businesses that create jobs in low- and moderate-income areas and employ residents of the areas. One loan was to build a spec home to be offered to LMI residents to provide quality, affordable housing in the area.

#### Odessa MSA

The level of CD lending is adequate. WTNB made eight loans totaling \$1.9 million, which represented 0.8 percent of tier 1 capital. CD loans were responsive to identified community needs. Examples of CD loans in the AA include:

• Six loans totaling \$1.0 million to develop real estate and build affordable housing in low-income areas.

• Two loans totaling \$902,000 to business in local businesses employing an aggregated 300 jobs to local residents in moderate-income geographies.

#### TX Non-MSA AA

The level of CD lending is adequate. WTNB made 11 loans totaling \$4.7 million, which represented 1.9 percent of tier 1 capital. CD loans were responsive to identified community needs. Examples of CD loans include:

- Four of the loans totaling \$3.8 million were made to provide sustainable farming, farm products, and employment in areas that have been designated as distressed/underserved or moderate-income.
- Four of the loans totaling \$516,000 were made to provide affordable housing in low- to moderate-income areas.
- Two loans totaling \$130,000 were made to local businesses that serve low- and moderate-income areas to provide affordable products and services to residents in the areas.

## **Product Innovation and Flexibility**

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

The bank made one loan totaling \$160,000 to build a spec home for low- and moderate-income prospects. The borrower is working to rebuild the community by providing affordable, quality homes in target areas of Midland.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Odessa MSA and TX Non-MSA AAs is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through V in the state of Texas section of appendix D for the facts and data that support these conclusions.

#### **Investment Test**

The bank's performance under the Investment Test in Texas is rated Low Satisfactory.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Midland MSA is adequate.

The institution has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Based on a full-scope review, the bank's performance in the Lubbock MSA is very poor.

The institution has a few, if any, qualified CD investments or grants, particularly those that are not routinely provided by private investors.

The institution exhibits very poor responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

| Table 4: Qualifie | d Inve | estments   |      |            |                       |                    |       |             |   |        |
|-------------------|--------|------------|------|------------|-----------------------|--------------------|-------|-------------|---|--------|
|                   | Pric   | or Period* | Curr | ent Period |                       | ,                  |       | Unfunded    |   |        |
| Assessment        |        |            |      |            |                       |                    |       | Commitments |   |        |
| Area              |        |            |      |            |                       |                    |       |             |   | *      |
|                   | #      | \$(000's)  | #    | \$(000's)  | #                     | % of               | #     | \$(000's)   |   |        |
|                   |        |            |      |            |                       | Total #            |       | Total \$    |   |        |
| Lubbock           | 0      | 0          | 0    | 0          | 0                     | 0.0                | 0     | 0.0         | 0 | 0      |
| Midland           | 4      | 7,860      | 5    | 1,747      | 9                     | 28.3               | 9,607 | 52.3        | 5 | 11,703 |
| Odessa            | 0      | 0          | 0    | 0          | 0                     | 0.0                | 0     | 0.0         | 0 | 0      |
| TX Non-MSA        | 0      | 0          | 0    | 0          | 0                     | 0.0                | 0     | 0.0         | 0 | 0      |
| BSRA              | 4      | 3,507      | 19   | 5,243      | 23                    | 23 71.9 8,750 48.0 |       |             |   | 4,757  |
| Total             | 8      | 11,367     | 24   | 6,990      | 32 100.0 18,357 100.0 |                    |       |             |   | 16,460 |
|                   |        |            |      |            |                       |                    |       |             | 0 |        |

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

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

The level of CD investments reflects adequate responsiveness to CD needs in the state. WTNB made 32 qualified investments, grants and donations during the evaluation period, totaling \$18.4 million and representing 7.3 percent of tier 1 capital. Additionally, 28 investments totaling \$9.6 million or over 52 percent of total qualified investments were made directly in the bank's AA. All qualified investments specifically benefited low- or moderate-income individuals or supported organizations whose primary purpose is revitalizing areas within the AAs. Investments beyond the banks AA are qualified as the bank demonstrated adequate responsiveness to its designated AAs. The bank made 23 investments totaling \$8.8 million along with five unfunded commitments totaling \$4.8 million either serve a Broader Statewide or Regional Area (BSRA) that includes the bank's AAs or areas beyond the bank's AA.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Odessa MSA and TX Non-MSA AAs is weaker than the bank's overall performance under the Investment Test in the full-scope areas.

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

Investments are heavily concentrated in WTNB's primary market area of the Midland MSA. Lack of extensive branch presence in the Odessa MSA and investment opportunities within the rural markets within the TX Non-MSA AA are the primary drivers for the poor performance.

## **Service Test**

The bank's performance under the Service Test in Texas is rated Low Satisfactory.

## **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank's performance in the Midland MSA is adequate.

Based on a full-scope review, the bank's performance in the Lubbock MSA is very poor.

# **Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

| Table 5: Distrib | Γable 5: Distribution of Branch Delivery System |          |                |          |            |          |       |      |          |             | 2022 |
|------------------|---|----------|----------------|----------|------------|----------|-------|------|----------|-------------|------|
|                  | Deposits  |          |                | Branches | Population |          |       |      |          |             |      |
|                  | % of Rated                                      | # of     | % of           | Loc      | cation of  | Branches | by    | % of | Populati | on within l | Each |
| Assessment       | Area  | BANK     | Rated          | Incor    | ne of Geo  | graphies | (%)   |      | Geog     | graphy      |      |
| Area             | Deposits in                                     | Branches | Area           |          |            |          |       |      |          |             |      |
|                  | AA  |          | Branches in AA | Low      | Mod        | Mid      | Upp   | Low  | Mod      | Mid         | Upp  |
| TX Non-          | 100.0   | 8        | 100.0          | 0.0      | 12.5       | 37.5     | 50.0  |      |          |             |      |
| MSA              |   |          |                |          |            |          |       | 1.2  | 12.4     | 49.6        | 36.4 |
| Odessa           | 100.0   | 1        | 100.0          | 0.0      | 0.0        | 0.0      | 100.0 |      |          |             |      |
| MSA              |   |          |                |          |            |          |       | 0.0  | 26.0     | 43.7        | 30.3 |
| Midland          | 100.0   | 3        | 100.0          | 0.0      | 0.0        | 33.3     | 66.6  |      |          |             |      |
| MSA              |   |          |                |          |            |          |       | 6.6  | 16.7     | 45.5        | 30.3 |

| Table 5: Distrib | oution of Branc    |              |                           |              | 2023       |      |                       |      |      |      |      |
|------------------|--------------------|--------------|---------------------------|--------------|------------|------|-----------------------|------|------|------|------|
|                  | Deposits           |              |                           | Branches     | Population |      |                       |      |      |      |      |
| Assessment       | % of Rated<br>Area | # of<br>BANK | % of<br>Rated             | Loc<br>Incor | % of       | -    | on within l<br>graphy | Each |      |      |      |
| Area             | Deposits in AA     | Branches     | Area<br>Branches<br>in AA | Low          | Mod        | Mid  | Upp                   | Low  | Mod  | Mid  | Upp  |
| TX Non-<br>MSA   | 100.0              | 8            | 100.0                     | 0.0          | 12.5       | 37.5 | 50.0                  | 1.2  | 12.4 | 49.6 | 36.4 |
| Lubbock<br>MSA   | 100.0              | 1            | 100.0                     | 0.0          | 100.0      | 0.0  | 0.0                   | 6.8  | 19.3 | 41.7 | 28.1 |
| Odessa<br>MSA    | 100.0              | 1            | 100.0                     | 0.0          | 0.0        | 0.0  | 100.                  | 0.0  | 26.0 | 43.7 | 30.3 |
| Midland<br>MSA   | 100.0              | 3            | 100.0                     | 0.0          | 0.0        | 33.3 | 66.7                  | 6.6  | 16.7 | 45.5 | 30.3 |

| Table 5: Distri | bution of Branc | h Delivery S | ystem    |          |            |          |       |      |          |           | 2024 |
|-----------------|-----------------|--------------|----------|----------|------------|----------|-------|------|----------|-----------|------|
|                 | Deposits        |              |          | Branches | Population |          |       |      |          |           |      |
|                 | % of Rated      | # of         | % of     | Loc      | ation of   | Branches | by    | % of | Populati | on within | Each |
| Assessment      | Area            | BANK         | Rated    | Incor    | ne of Geo  | graphies | (%)   |      | Geog     | graphy    |      |
| Area            | Deposits in     | Branches     | Area     |          |            |          |       |      |          |           |      |
|                 | AA              |              | Branches | Low      | Mod        | Mid      | Upp   | Low  | Mod      | Mid       | Upp  |
|                 |                 |              | in AA    |          |            |          |       |      |          |           |      |
| TX Non-         | 100.0           | 8            | 100.0    | 0.0      | 12.5       | 37.5     | 50.0  |      |          |           |      |
| MSA             |                 |              |          |          |            |          |       | 1.0  | 12.3     | 53.0      | 33.4 |
| Lubbock         | 100.0           | 1            | 100.0    | 0.0      | 100.0      | 0.0      | 0.0   |      |          |           |      |
| MSA             |                 |              |          |          |            |          |       | 5.8  | 20.3     | 41.7      | 28.1 |
| Odessa          | 100.0           | 1            | 100.0    | 0.0      | 0.0        | 0.0      | 100.0 |      |          |           |      |
| MSA             |                 |              |          |          |            |          |       | 0.0  | 26.0     | 43.7      | 30.3 |
| Midland         | 100.0           | 3            | 100.0    | 0.0      | 0.0        | 33.3     | 66.7  |      |          |           |      |
| MSA             |                 |              |          |          |            |          |       | 6.6  | 16.7     | 45.5      | 30.3 |

As of 2024, the bank operates 13 branches across the west Texas region, including the main office. WTNB has 2 branches in moderate-income tracts, 4 branches in middle-income tracts, and 7 in upper-income tracts. The percentage of WTNB branches in low- and moderate-income geographies matches the demographics of the AA.

|                    | Branch Openings/Closings |                         |   |     |     |     |  |  |  |  |  |  |
|--------------------|--------------------------|-------------------------|---|-----|-----|-----|--|--|--|--|--|--|
| Assessment<br>Area | # of Branch<br>Openings  | # of Branch<br>Closings | Net change in Location of Branches (+ or -) |     |     |     |  |  |  |  |  |  |
|                    |                          |                         | Low   | Mod | Mid | Upp |  |  |  |  |  |  |
| TX Non-MSA         | 1                        | 0                       | 0   | 0   | 0   | 1   |  |  |  |  |  |  |
| Lubbock MSA        | 1                        | 0                       | 0   | 1   | 0   | 0   |  |  |  |  |  |  |
| Odessa MSA         | 0                        | 0                       | 0   | 0   | 0   | 0   |  |  |  |  |  |  |
| Midland MSA        | 0                        | 0                       | 0   | 0   | 0   | 0   |  |  |  |  |  |  |
| Total              | 1                        | 0                       | 0   | 1   | 0   | 1   |  |  |  |  |  |  |

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

The bank opened two branches and closed no branches during the review period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA(s), particularly low- and moderate-income geographies and/or individuals.

Bank lobby hours vary by location but are generally Monday through Friday, 9:00 AM to 4:00 PM, with drive-through hours from 8:00 AM to 6:00 PM. Saturday drive-through services are provided at the Midland-Wadley and Alpine branches from 9:00 AM to 1:00 PM and 9:00 AM to 12:00 PM, respectively. WTNB provides 24-hour online banking access to personal and business accounts through its website at www.wtnb.com and mobile app that offers bill pay and mobile deposit capabilities. Online account opening is also available.

# **Community Development Services**

The institution provides an adequate level of CD services.

#### Midland MSA

WTNB provided an adequate level of CD services in the AA. During the evaluation period, bank officers and employees provided 481.5 CD service hours at approximately seven different organizations in the AA. Employees shared their financial expertise by serving as board members, educators, and advisors that help provide affordable housing, economic development opportunities, and community service to low- and moderate-income individuals. Service activity examples during the evaluation period include:

- Agape Counseling Services: One employee served as a Board of Director and Finance Committee Member/Advisor for the Agape Counseling Services. The Agape Counseling Services is a non-profit organization located in Midland, Texas, which provides professional counseling for people with mental and emotional needs. The employee provides financial oversight for the organization, including budgeting and financial reporting.
- Midland Community Development Corporation: One employee served as a Board Member and member of the Finance Committee for the Midland Community Development Corporation (MCDC). MCDC, a federally certified Community Development Financial Institute, is dedicated to rebuilding their community by providing financing and education to small businesses and first-time home buyers in low- and moderate-income areas of Midland.
- Casa De Migos: One employee served as Vice President and Compliance Manager for the Casa De Migos. Casa De Migos provides comprehensive services in four main areas: adult and youth education (including financial literacy and job skill training); social services (including food pantry, clothing, and school supplies); health and wellness; and senior services (home cleaning for low-income and elderly clients). Job skill training program's goal is to bridge

#### Lubbock MSA

WTNB provided few if any CD services. During the evaluation period, bank employees provided no CD service hours in the AA. WTNB entered the Lubbock MSA in 2023 and has not provided any CD service hours since entering the Lubbock MSA.

# **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Odessa MSA and TX Non-MSA AAs is consistent with the bank's overall performance under the Service Test in the full-scope areas.

#### Odessa MSA

WTNB provided an adequate level of CD services in the AA. During the evaluation period, bank officers and employees provided 79.5 CD service hours at approximately four different organizations in

the AA. Employees shared their financial expertise by serving as board members, advisors, and community participant that help provide affordable housing, economic development opportunities, and community service to low- and moderate-income individuals. Service activity examples during the evaluation period include:

- Odessa Hispanic Chamber of Commerce: One employee served as an Advisory Board Member for the Odessa Hispanic Chamber of Commerce. One of the missions for the Odessa Hispanic Chamber of Commerce is to help minority owned businesses grow. The individual provided professional advice on how to grow membership and provide value to their Hispanic Business Owner Members through business advising and education.
- Odessa City Council: One employee served as a community participant for the Odessa City
  Council. The employee participated in a forum held by the Odessa City Council discussing ideas
  on how Odessa could emulate the success of other communities in providing affordable housing.

#### Texas Non-MSA

WTNB provides an adequate level of CD services in the AA. Counties included in this AA are in the Trans-Pecos and Gaines-Yoakum regions. During the evaluation period, bank officers and employees provided 360.5 CD service hours at approximately seven different organizations in the AA. Employees provided financial expertise by serving as board members, volunteering, and officers that help provide affordable housing and community service to low- to moderate-income individuals. Service activity examples during the evaluation period include:

- Alpine Housing Authority: One employee served as Vice Chairman for the Alpine Housing Authority. Primary responsibilities included providing leadership, advocating for low-income housing, obtaining and managing funds to support the public housing authority, and approving and adopting budgets.
- West Texas Food Bank: Multiple employees volunteered at the West Texas Food Bank.
   Employees volunteered by handing out food and financial literacy information to over 200 families.
- Yoakum County Hospital: One employee served as a board member for the Yoakum County Hospital. A large portion of patients at the Yoakum County Hospital are low- to moderateincome individuals. The employee assists with financial planning and review aspects of budgeting.

# **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:            | 01/01/2022 - 12/31/202 | 01/01/2022 - 12/31/2024   |  |  |  |  |  |  |  |  |
|----------------------------------|------------------------|---|--|--|--|--|--|--|--|--|
| Bank Products Reviewed:          | Home mortgage, small   | Home mortgage, small business, small farm loans                           |  |  |  |  |  |  |  |  |
|                                  | Community developme    | Community development loans, qualified investments, community development |  |  |  |  |  |  |  |  |
|                                  | services               | services  |  |  |  |  |  |  |  |  |
| List of Assessment Areas and Typ | e of Examination       |   |  |  |  |  |  |  |  |  |
| Rating and Assessment Areas      | Type of Exam           | Other Information   |  |  |  |  |  |  |  |  |
| State of Texas                   |                        |   |  |  |  |  |  |  |  |  |
| Lubbock MSA                      | Full-scope             | Lubbock County  |  |  |  |  |  |  |  |  |
| Midland MSA                      | Full-scope             | Midland County  |  |  |  |  |  |  |  |  |
| Odessa MSA                       | Limited-scope          | Ector County  |  |  |  |  |  |  |  |  |
|                                  |                        | Counties of Brewster, Crane, Reeves, Winkler,                             |  |  |  |  |  |  |  |  |
| TX Non-MSA                       | Limited-scope          | Culberson, Jeff Davis, Pecos, Ward, Floyd, Hale,                          |  |  |  |  |  |  |  |  |
|                                  | _                      | Gaines, Howard, and Yoakum  |  |  |  |  |  |  |  |  |

# **Appendix B: Summary of MMSA and State Ratings**

| RATINGS West Texas National Bank |                         |                           |                        |  |  |  |  |  |  |  |  |
|----------------------------------|-------------------------|---------------------------|------------------------|--|--|--|--|--|--|--|--|
| Overall Bank:                    | Lending Test<br>Rating* | Investment Test<br>Rating | Service Test<br>Rating | Overall Bank/State/<br>Multistate Rating |  |  |  |  |  |  |  |
| WTNB                             | High Satisfactory       | Low Satisfactory          | Low Satisfactory       | Satisfactory                             |  |  |  |  |  |  |  |
| State:                           |                         |                           |                        |  |  |  |  |  |  |  |  |
| Texas                            | High Satisfactory       | Low Satisfactory          | Low Satisfactory       | Satisfactory                             |  |  |  |  |  |  |  |

<sup>(\*)</sup> The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

# **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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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.

**MMSA** (**state**): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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 loans are treated the same 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 30<sup>th</sup> 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 7.** 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 8.** 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 9.** 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 10.** 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 11. 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. 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 12. 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                |        |               |  |                    |           |  |                        |           |  |                      | 20        | 022  |                     |           |  |                      |           |  |
|--|----------------|--------|---------------|--|--------------------|-----------|--|------------------------|-----------|--|----------------------|-----------|--|---------------------|-----------|--|----------------------|-----------|--|
| Assessment<br>Area:  | Mortgage Loans |        |               |  |                    |           |  | Moderate-Income Tracts |           |  | Middle-Income Tracts |           |  | Upper-Income Tracts |           |  | Not Available-Income |           |  |
|  | #              | \$     | % of<br>Total | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans     | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans   | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans  | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans   | Aggregate |  |
| Midland<br>MSA   | 26             | 11,736 | 53.1          | 5.2  | 3.9                | 2.2       | 16.4   | 11.5                   | 8.8       | 42.1   | 26.9                 | 51.7      | 35.7   | 57.7                | 36.4      | 0.7  | 0.0                  | 0.9       |  |
| Odessa MSA   | 0              | 0      | 0.0           | 0.0  | 0.0                | 0.0       | 25.2   | 0.0                    | 10.7      | 44.7   | 0.0                  | 39.6      | 30.1   | 0.0                 | 43.8      | 0.0  | 0.0                  | 0.0       |  |
| TX Non-<br>MSA   | 23             | 6,176  | 46.9          | 1.3  | 0.0                | 0.3       | 11.5   | 8.7                    | 5.6       | 49.5   | 52.2                 | 49.5      | 37.7   | 39.1                | 44.6      | 0.0  | 0.0                  | 0.0       |  |
| Total  | 49             | 17,912 | 100.0         | 2.3  | 2.0                | 1.1       | 17.8   | 10.2                   | 8.9       | 45.2   | 38.8                 | 47.1      | 34.5   | 49.0                | 42.4      | 0.3  | 0.0                  | 0.5       |  |

Source: 2020 U.S Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

| Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography |                                   |        |               |  |                    |           |  |                    |           |  |                    | 2         | 023  |                    |           |  |                    |                   |  |
|--|-----------------------------------|--------|---------------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-------------------|--|
| Assessment<br>Area:  | ment Total Home<br>Mortgage Loans |        |               | Low  | -Income            | Tracts    | Moderate-Income Tracts                         |                    |           | Middle-Income Tracts                           |                    |           | Upper-Income Tracts                            |                    |           | Not Availa                                     | ble-Inco           | ble-Income Tracts |  |
|  | #                                 | \$     | % of<br>Total | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate         |  |
| Lubbock<br>MSA   | 27                                | 16,025 | 42.2          | 4.6  | 14.8               | 2.2       | 16.3   | 40.7               | 14.5      | 41.9   | 29.6               | 39.3      | 36.1   | 11.1               | 43.1      | 1.1  | 3.7                | 1.0               |  |
| Midland<br>MSA   | 12                                | 3,860  | 18.8          | 5.2  | 0.0                | 2.2       | 16.4   | 16.7               | 7.1       | 42.1   | 33.3               | 48.9      | 35.7   | 50.0               | 40.5      | 0.7  |                    | 1.4               |  |
| Odessa MSA   | 2                                 | 300    | 3.1           |  |                    |           | 25.2   |                    | 11.9      | 44.7   | 50.0               | 36.3      | 30.1   | 50.0               | 51.8      |  |                    |                   |  |
| TX Non-<br>MSA   | 23                                | 3,565  | 35.9          | 1.3  | 0.0                | 0.4       | 11.5   | 8.7                | 6.3       | 49.5   | 43.5               | 48.9      | 37.7   | 47.8               | 44.4      |  |                    | 0.1               |  |
| Total  | 64                                | 23,750 | 100.0         | 3.2  | 6.3                | 1.5       | 17.3   | 23.4               | 11.2      | 43.9   | 35.9               | 42.2      | 35.1   | 32.8               | 44.4      | 0.6  | 1.6                | 0.8               |  |

Source: 2020 U.S Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

| Table 7<br>Geogra   |    |                        | ment A        | rea Di   | strib              | oution of | f Home   | Mor                | tgage Lo  | oans by  | Inco               | me Cate   | egory of                                       | the                |           |  | 20                 | 024        |
|---------------------|----|------------------------|---------------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|------------|
| Assessment<br>Area: | М  | Total Hor<br>ortgage L |               | Low  | -Income            | Tracts    | Moderate                                       | -Income            | Tracts    | Middle-l                                       | Income T           | racts     | Upper-I  | ncome T            | racts     | Not Availa                                     | ble-Inco           | ome Tracts |
|                     | #  | \$                     | % of<br>Total | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate  |
| Lubbock<br>MSA      | 6  | 2,805                  | 11.1          | 3.9  |                    | 2.2       | 17.1   |                    | 14.5      | 41.9   | 16.7               | 39.3      | 36.1   | 83.3               | 43.1      | 1.1  |                    | 1.0        |
| Midland<br>MSA      | 11 | 3,098                  | 20.4          | 5.2  |                    | 2.2       | 16.4   | 27.3               | 7.1       | 42.1   | 18.2               | 48.9      | 35.7   | 54.6               | 40.5      | 0.7  |                    | 1.4        |
| Odessa MSA          | 3  | 1,126                  | 5.6           |  |                    |           | 25.2   |                    | 11.9      | 44.7   | 33.3               | 36.3      | 30.1   | 66.7               | 51.8      |  |                    |            |
| TX Non-<br>MSA      | 34 | 8,142                  | 63.0          | 1.1  |                    | 0.4       | 11.2   | 2.9                | 6.4       | 53.3   | 50.0               | 50.2      | 34.4   | 47.1               | 43.0      |  |                    | 0.1        |
| Total               | 54 | 15,170                 | 100.0         | 2.8  | •                  | 1.5       | 17.2   | 7.4                | 11.1      | 45.0   | 38.9               | 42.5      | 34.5   | 53.7               | 44.2      | 0.6  |                    | 0.8        |

| Table 8: As<br>Borrower | ses | sment                  | Area          | a Distr          | ibuti              | on of H   | lome M           | Iortg              | age Loa   | ans by           | Incor              | me Cate   | egory o          | f the              |           |                  | 20                   | )22       |
|-------------------------|-----|------------------------|---------------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|----------------------|-----------|
| Assessment Area:        | М   | Total Ho<br>lortgage L |               | Low              | -Income            | Borrowers | Moderate         | e-Income           | Borrowers | Middle-          | Income I           | Borrowers | Upper-l          | Income B           | orrowers  |                  | vailable-<br>Borrowe |           |
|                         | #   | \$                     | % of<br>Total | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans   | Aggregate |
| Midland MSA             | 26  | 11,736                 | 53.1          | 21.6             |                    | 7.7       | 17.3             | 7.7                | 19.8      | 19.2             | 26.9               | 21.8      | 41.9             | 46.2               | 24.5      |                  | 19.2                 | 26.2      |
| Odessa MSA              | 0   | 0                      | 0.0           | 22.9             |                    | 5.3       | 18.2             |                    | 21.0      | 17.2             |                    | 22.5      | 41.7             |                    | 20.4      |                  |                      | 30.8      |
| TX Non-MSA              | 23  | 6,176                  | 46.9          | 20.2             |                    | 2.7       | 15.1             | 13.0               | 10.9      | 18.5             | 8.7                | 20.2      | 46.2             | 78.3               | 40.9      |                  |                      | 25.4      |
| Total                   | 49  | 17,912                 | 100.0         | 21.7             |                    | 6.0       | 17.0             | 10.2               | 18.7      | 18.3             | 18.4               | 21.8      | 43.1             | 61.2               | 25.9      |                  | 10.2                 | 27.7      |

| Table 8: As<br>Borrower | sess | sment                  | Area          | a Distr          | ibuti              | on of H   | ome M            | lortg              | age Loa   | ans by           | Inco               | me Cate   | egory o          | f the              |           |                  | 20                   | )23       |
|-------------------------|------|------------------------|---------------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|----------------------|-----------|
| Assessment Area:        |      | Total Hot<br>ortgage L |               | Low              | -Income            | Borrowers | Moderate         | e-Income           | Borrowers | Middle-          | Income 1           | Borrowers | Upper-l          | Income F           | Borrowers |                  | vailable-<br>Borrowe |           |
|                         | #    | \$                     | % of<br>Total | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans   | Aggregate |
| Lubbock MSA             | 27   | 16,025                 | 42.2          | 22.7             |                    | 3.8       | 16.4             |                    | 11.8      | 19.4             |                    | 16.9      | 41.5             | 3.7                | 34.7      |                  | 96.3                 | 32.8      |
| Midland MSA             | 12   | 3,860                  | 18.8          | 21.6             |                    | 3.3       | 17.3             |                    | 14.0      | 19.2             | 16.7               | 20.9      | 41.9             | 58.3               | 31.2      |                  | 25.0                 | 30.7      |
| Odessa MSA              | 2    | 300                    | 3.1           | 22.9             |                    | 1.1       | 18.2             |                    | 6.5       | 17.2             | 50.0               | 19.5      | 41.7             | 50.0               | 41.0      |                  |                      | 32.0      |
| TX Non-MSA              | 23   | 3,565                  | 35.9          | 20.2             |                    | 1.6       | 15.1             | 17.39              | 8.6       | 18.5             | 26.1               | 18.7      | 46.2             | 39.1               | 38.9      |                  | 17.4                 | 32.2      |
| Total                   | 64   | 23,750                 | 100.0         | 22.1             |                    | 2.9       | 16.7             | 6.25               | 11.0      | 18.7             | 14.1               | 18.7      | 42.5             | 28.1               | 35.5      |                  | 51.6                 | 32.0      |

| Table 8: As<br>Borrower | ses | sment                  | Area          | a Distr          | ibuti              | on of H   | ome M            | lortg              | age Loa   | ans by           | Inco               | me Cato   | egory o          | f the              |           |                  | 20                   | )24       |
|-------------------------|-----|------------------------|---------------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|----------------------|-----------|
| Assessment Area:        | M   | Total Ho<br>lortgage L |               | Low              | -Income            | Borrowers | Moderate         | -Income            | Borrowers | Middle-          | Income 1           | Borrowers | Upper-l          | Income F           | Borrowers |                  | vailable-<br>Borrowe |           |
|                         | #   | \$                     | % of<br>Total | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans   | Aggregate |
| Lubbock MSA             | 6   | 2,805                  | 11.1          | 22.2             |                    | 3.8       | 16.2             |                    | 11.8      | 19.3             |                    | 16.9      | 42.3             | 33.3               | 34.7      |                  | 66.7                 | 32.8      |
| Midland MSA             | 11  | 3,098                  | 20.4          | 21.6             | 9.1                | 3.3       | 17.3             |                    | 14.0      | 19.2             |                    | 20.9      | 41.9             | 63.6               | 31.2      |                  | 27.3                 | 30.7      |
| Odessa MSA              | 3   | 1,126                  | 5.6           | 22.9             |                    | 1.1       | 18.2             |                    | 6.5       | 17.2             | 33.3               | 19.5      | 41.7             | 66.7               | 41.0      |                  |                      | 32.0      |
| TX Non-MSA              | 34  | 8,142                  | 63.0          | 20.7             | 5.9                | 2.1       | 15.5             | 8.8                | 10.3      | 19.3             | 11.8               | 18.6      | 44.5             | 44.1               | 37.9      |                  | 29.4                 | 31.2      |
| Total                   | 54  | 15,170                 | 100.0         | 21.9             | 5.6                | 2.9       | 16.7             | 5.6                | 11.1      | 18.9             | 9.3                | 18.7      | 42.5             | 48.2               | 35.4      |                  | 31.5                 | 31.9      |

Source: 2024 U.S Census; 01/01/2024 - 12/31/2024 Bank Data, 2023 HMDA Aggregate Data, "--"

data not available. Due to rounding, totals may not equal 100.0

| Table 9: Ass<br>the Geograp |      | ent A                    | rea Di        | stribution      | of Loa             | ans to Sma              | ıll Busi           | nesses by          | Incom              | e Category            | y of               |                 | 2022                |
|-----------------------------|------|--------------------------|---------------|-----------------|--------------------|-------------------------|--------------------|--------------------|--------------------|-----------------------|--------------------|-----------------|---------------------|
|                             | Tota | al Loans to<br>Businesse |               | Low-Income Tr   | acts               | Moderate-Inco<br>Tracts | me                 | Middle-In<br>Tract |                    | Upper-Incon<br>Tracts | ne                 |                 | ble- Income<br>acts |
| Assessment Area:            | #    | \$                       | % of<br>Total | %<br>Businesses | %<br>Bank<br>Loans | %<br>Businesses         | %<br>Bank<br>Loans | %<br>Businesses    | %<br>Bank<br>Loans | %<br>Businesses       | %<br>Bank<br>Loans | %<br>Businesses | %<br>Bank Loans     |
| Midland MSA                 | 113  | 22,086                   | 63.8          | 6.6             | 2.7                | 35.4                    | 43.4               | 34.0               | 15.0               | 23.1                  | 35.4               | 1.0             | 3.5                 |
| Odessa MSA                  | 10   | 2,269                    | 5.7           |                 |                    | 35.8                    | 20.0               | 38.1               | 20.0               | 26.1                  | 60.0               |                 |                     |
| TX Non-MSA                  | 54   | 6,448                    | 30.5          | 1.3             |                    | 11.9                    | 9.3                | 46.9               | 40.7               | 39.9                  | 50.0               |                 |                     |
| Total                       | 177  | 30,803                   | 100.0         | 3.1             | 1.7                | 29.3                    | 31.6               | 38.8               | 23.2               | 28.5                  | 41.2               | 0.4             | 2.3                 |

| Table 9: Ass<br>the Geogra |      | ent A                    | rea Di        | stribution      | of Loa             | ans to Sma              | all Busi           | nesses by          | Income             | e Category            | y of               |                 | 2023                |
|----------------------------|------|--------------------------|---------------|-----------------|--------------------|-------------------------|--------------------|--------------------|--------------------|-----------------------|--------------------|-----------------|---------------------|
|                            | Tota | al Loans to<br>Businesse |               | Low-Income Tr   | racts              | Moderate-Inco<br>Tracts | me                 | Middle-In<br>Tract |                    | Upper-Incon<br>Tracts | ne                 |                 | ble- Income<br>acts |
| Assessment Area:           | #    | \$                       | % of<br>Total | %<br>Businesses | %<br>Bank<br>Loans | %<br>Businesses         | %<br>Bank<br>Loans | %<br>Businesses    | %<br>Bank<br>Loans | %<br>Businesses       | %<br>Bank<br>Loans | %<br>Businesses | %<br>Bank Loans     |
| Lubbock MSA                | 74   | 25,670                   | 35.2          | 4.3             |                    | 16.4                    | 1.4                | 37.2               | 21.6               | 39.9                  | 74.3               | 2.2             | 2.7                 |
| Midland MSA                | 67   | 12,139                   | 31.9          | 4.2             | 3.0                | 23.7                    | 31.3               | 33.8               | 16.4               | 37.2                  | 49.3               | 1.1             |                     |
| Odessa MSA                 | 16   | 2,776                    | 7.6           |                 |                    | 26.1                    | 18.8               | 40.1               | 37.5               | 33.8                  | 43.8               |                 |                     |
| TX Non-MSA                 | 53   | 6,824                    | 25.2          | 1.1             |                    | 13.3                    | 5.7                | 45.7               | 47.2               | 39.9                  | 47.2               | 0.0             |                     |
| Total                      | 210  | 47,409                   | 100.0         | 3.1             | 1.0                | 19.9                    | 13.3               | 37.8               | 27.6               | 38.0                  | 57.1               | 1.2             | 1.0                 |

|                  | Tota | al Loans to<br>Businesse |               | Low-Income Tr   | racts              | Moderate-Inco<br>Tracts | ome                | Middle-In<br>Tract |                    | Upper-Incon<br>Tracts | ne                 |                 | ble- Income<br>acts |
|------------------|------|--------------------------|---------------|-----------------|--------------------|-------------------------|--------------------|--------------------|--------------------|-----------------------|--------------------|-----------------|---------------------|
| Assessment Area: | #    | \$                       | % of<br>Total | %<br>Businesses | %<br>Bank<br>Loans | %<br>Businesses         | %<br>Bank<br>Loans | %<br>Businesses    | %<br>Bank<br>Loans | %<br>Businesses       | %<br>Bank<br>Loans | %<br>Businesses | %<br>Bank Loans     |
| Lubbock MSA      | 66   | 21,906                   | 24.7          | 3.8             | 4.6                | 18.2                    | 1.5                | 36.7               | 30.3               | 39.0                  | 63.6               | 2.4             |                     |
| Midland MSA      | 100  | 21,854                   | 37.5          | 4.3             | 4.0                | 24.4                    | 36.0               | 34.1               | 23.0               | 36.1                  | 37.0               | 1.2             |                     |
| Odessa MSA       | 8    | 3,233                    | 3.0           |                 |                    | 26.5                    | 12.5               | 39.4               | 50.0               | 34.1                  | 37.5               |                 |                     |
| TX Non-MSA       | 93   | 11,279                   | 34.8          | 0.9             |                    | 12.0                    | 4.3                | 50.1               | 49.5               | 37.0                  | 46.2               | 0.0             |                     |
| Total            | 267  | 58,272                   | 100.0         | 2.7             | 2.6                | 20.7                    | 15.7               | 38.6               | 34.8               | 36.8                  | 46.8               | 1.2             |                     |

| Table 10: Assess | ment Area | Distribut      | tion of Lo      | oans to S         | mall Bus        | inesses b       | y Gross   | Annual R        | evenues         |                        | 2022            |
|------------------|-----------|----------------|-----------------|-------------------|-----------------|-----------------|-----------|-----------------|-----------------|------------------------|-----------------|
|                  | ,         | Total Loans to | Small Businesse | es                | Businesses      | with Revenues   | <= 1MM    | Businesses wir  | th Revenues >   | Businesses w<br>Not Av |                 |
| Assessment Area: | #         | \$             | % of Total      | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses | % Bank<br>Loans | %<br>Businesses        | % Bank<br>Loans |
| Midland MSA      | 113       | 22,086         | 63.8            | 6,183             | 77.8            | 46.9            | 42.7      | 11.3            | 46.9            | 10.9                   | 6.2             |
| Odessa MSA       | 10        | 2,269          | 5.7             | 4,305             | 76.1            | 50.0            | 37.6      | 10.8            | 40.0            | 13.0                   | 10.0            |
| TX Non-MSA       | 54        | 6,448          | 30.5            | 2,616             | 71.2            | 77.8            | 43.0      | 10.8            | 22.2            | 18.0                   |                 |
| Total            | 177       | 30,803         | 100.0           | 13,104            | 75.5            | 56.5            | 41.1      | 11.0            | 39.0            | 13.5                   | 4.5             |

| Table 10: Assess | sment Area | Distribut        | ion of Lo       | oans to S         | mall Busi       | inesses b       | y Gross   | Annual R        | evenues         |                        | 2023            |
|------------------|------------|------------------|-----------------|-------------------|-----------------|-----------------|-----------|-----------------|-----------------|------------------------|-----------------|
|                  | 7          | Fotal Loans to S | Small Businesse | es                | Businesses      | with Revenues   | s <= 1MM  | Businesses wit  |                 | Businesses w<br>Not Av |                 |
| Assessment Area: | #          | \$               | % of Total      | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses | % Bank<br>Loans | %<br>Businesses        | % Bank<br>Loans |
| Lubbock MSA      | 74         | 25,670           | 35.2            | 7,014             | 80.0            | 29.7            | 48.5      | 9.5             | 70.3            | 10.6                   |                 |
| Midland MSA      | 67         | 12,139           | 31.9            | 6,320             | 79.4            | 52.2            | 44.8      | 10.5            | 43.3            | 10.1                   | 4.5             |
| Odessa MSA       | 16         | 2,776            | 7.6             | 4,131             | 78.5            | 37.5            | 42.1      | 10.2            | 62.5            | 11.3                   |                 |
| TX Non-MSA       | 53         | 6,824            | 25.2            | 2,555             | 73.0            | 79.3            | 45.6      | 10.5            | 15.1            | 16.5                   | 5.7             |
| Total            | 210        | 47,409           | 100.0           | 20,020            | 78.6            | 50.0            | 45.7      | 10.1            | 47.1            | 11.3                   | 2.9             |

| Table 10: Assess | ment Area | Distribut        | tion of Lo      | oans to S         | mall Busi       | inesses b       | y Gross   | Annual R        | evenues         |                 | 2024                     |
|------------------|-----------|------------------|-----------------|-------------------|-----------------|-----------------|-----------|-----------------|-----------------|-----------------|--------------------------|
|                  | 7         | Fotal Loans to S | Small Businesse | s                 | Businesses      | with Revenues   | <= 1MM    | Businesses wit  | th Revenues >   |                 | ith Revenues<br>vailable |
| Assessment Area: | #         | \$               | % of Total      | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses | % Bank<br>Loans | %<br>Businesses | % Bank<br>Loans          |
| Lubbock MSA      | 66        | 21,906           | 24.7            | 7,014             | 78.6            | 31.8            | 48.5      | 9.6             | 66.7            | 11.9            | 1.5                      |
| Midland MSA      | 100       | 21,854           | 37.5            | 6,321             | 78.4            | 59.0            | 44.8      | 10.1            | 31.0            | 11.5            | 10.0                     |
| Odessa MSA       | 8         | 3,233            | 3.0             | 4,131             | 79.0            | 62.5            | 42.2      | 9.5             | 37.5            | 11.5            |                          |
| TX Non-MSA       | 93        | 11,279           | 34.8            | 2,984             | 73.5            | 82.8            | 46.4      | 9.9             | 11.8            | 16.7            | 5.4                      |
| Total            | 267       | 58,272           | 100.0           | 20,449            | 77.7            | 60.7            | 45.8      | 9.8             | 33.3            | 12.5            | 6.0                      |

| Table 11: A<br>Geography | ssessn | nent A      | rea D         | istribu       | ition (            | of Loa         | ns to I            | Farms by    | Income (        | Category   | of the          |                  | 2022            |
|--------------------------|--------|-------------|---------------|---------------|--------------------|----------------|--------------------|-------------|-----------------|------------|-----------------|------------------|-----------------|
|                          | Total  | Loans to Fa | ırms          | Low-In<br>Tra |                    | Mode<br>Income |                    | Middle-Inco | ome Tracts      | Upper-Inc  | ome Tracts      | Not Available- l | Income Tracts   |
| Assessment Area:         | #      | \$          | % of<br>Total | %<br>Farms    | %<br>Bank<br>Loans | %<br>Farms     | %<br>Bank<br>Loans | %<br>Farms  | %<br>Bank Loans | %<br>Farms | %<br>Bank Loans | %<br>Farms       | %<br>Bank Loans |
| Midland MSA              | 1      | 40          | 2.0           | 1.8           |                    | 40.3           | 100.0              | 31.4        |                 | 26.1       |                 | 0.4              |                 |
| Odessa MSA               | 0      | 0           | 0.0           |               |                    | 25.0           |                    | 35.7        |                 | 39.3       |                 |                  |                 |
| TX Non-MSA               | 50     | 8,968       | 98.0          |               |                    | 5.6            |                    | 55.5        | 58.0            | 38.9       | 58.0            |                  |                 |
| Total                    | 51     | 9,008       | 100.0         | 0.7           | ŀ                  | 21.0           | 2.0                | 43.9        | 56.9            | 34.3       | 56.9            | 0.2              |                 |

| Table 11: A<br>Geography | ssessn  | nent A      | rea D         | istribu       | ıtion (            | of Loa         | ns to I            | Farms by    | Income (        | Category   | of the          |                  | 2023            |
|--------------------------|---------|-------------|---------------|---------------|--------------------|----------------|--------------------|-------------|-----------------|------------|-----------------|------------------|-----------------|
|                          | Total 1 | Loans to Fa | rms           | Low-In<br>Tra |                    | Mode<br>Income |                    | Middle-Inco | ome Tracts      | Upper-Inc  | come Tracts     | Not Available- I | ncome Tracts    |
| Assessment Area:         | #       | \$          | % of<br>Total | %<br>Farms    | %<br>Bank<br>Loans | %<br>Farms     | %<br>Bank<br>Loans | %<br>Farms  | %<br>Bank Loans | %<br>Farms | %<br>Bank Loans | %<br>Farms       | %<br>Bank Loans |
| Lubbock MSA              | 0       | 0           | 0.0           | 2.8           |                    | 10.9           |                    | 39.9        |                 | 45.8       |                 | 0.5              |                 |
| Midland MSA              | 0       | 0           | 0.0           | 0.8           |                    | 27.0           |                    | 24.2        |                 | 46.2       |                 | 1.7              |                 |
| Odessa MSA               | 0       | 0           | 0.0           |               |                    | 18.0           |                    | 34.2        |                 | 47.9       |                 |                  |                 |
| TX Non-MSA               | 54      | 8,062       | 100.0         |               |                    | 6.5            |                    | 56.4        | 38.9            | 37.1       | 61.1            |                  |                 |
| Total                    | 54      | 8,062       | 100.0         | 1.5           |                    | 14.0           |                    | 39.8        | 38.9            | 44.1       | 61.1            | 0.6              |                 |

| Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography |                      |        |               |                      |                    |                            |                    |                      |                 |                     |                 | 2024                         |                 |
|--|----------------------|--------|---------------|----------------------|--------------------|----------------------------|--------------------|----------------------|-----------------|---------------------|-----------------|------------------------------|-----------------|
| Assessment Area:   | Total Loans to Farms |        |               | Low-Income<br>Tracts |                    | Moderate-<br>Income Tracts |                    | Middle-Income Tracts |                 | Upper-Income Tracts |                 | Not Available- Income Tracts |                 |
|  | #                    | \$     | % of<br>Total | %<br>Farms           | %<br>Bank<br>Loans | %<br>Farms                 | %<br>Bank<br>Loans | %<br>Farms           | %<br>Bank Loans | %<br>Farms          | %<br>Bank Loans | %<br>Farms                   | %<br>Bank Loans |
| Lubbock MSA  | 2                    | 399    | 2.35          | 2.0                  |                    | 11.1                       |                    | 42.6                 |                 | 43.9                | 100.0           | 0.5                          |                 |
| Midland MSA  | 2                    | 425    | 2.35          | 0.8                  |                    | 26.4                       |                    | 25.8                 |                 | 45.2                | 100.0           | 1.7                          |                 |
| Odessa MSA   | 0                    | 0      | 0.00          |                      |                    | 17.5                       |                    | 35.1                 |                 | 47.4                |                 |                              |                 |
| TX Non-MSA   | 81                   | 12,449 | 95.29         |                      |                    | 5.6                        |                    | 64.5                 | 60.5            | 29.9                | 39.5            |                              |                 |
| Total  | 85                   | 13,273 | 100.00        | 1.0                  |                    | 13.1                       |                    | 45.5                 | 57.7            | 39.9                | 42.34           | 0.5                          |                 |

| Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues |            |            |               |                   |               |                 |           |            |                 |                            | 2022            |
|---|------------|------------|---------------|-------------------|---------------|-----------------|-----------|------------|-----------------|----------------------------|-----------------|
| Assessment Area:  | Total Loan | s to Farms |               |                   | Farms with Re | evenues <= 1MM  |           | Farms with | Revenues > 1MM  | Farms with Re<br>Available | evenues Not     |
|   | #          | \$         | % of<br>Total | Overall<br>Market | % Farms       | % Bank<br>Loans | Aggregate | % Farms    | % Bank<br>Loans | % Farms                    | % Bank<br>Loans |
| Midland MSA   | 1          | 40         | 2.0           | 44                | 95.6          | 100.0           | 77.3      | 4.4        |                 |                            |                 |
| Odessa MSA  | 0          | 0          | 0.0           | 17                | 89.3          |                 | 58.8      | 9.5        |                 | 1.2                        |                 |
| TX Non-MSA  | 50         | 8,968      | 98.0          | 390               | 80.5          | 86.0            | 48.7      | 18.5       | 14.0            | 1.0                        |                 |
| Total   | 51         | 9,008      | 100.0         | 451               | 87.3          | 86.3            | 52.0      | 12.1       | 13.7            | 0.7                        |                 |

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

| <b>Table 12: A</b> : | ssessme    | nt Area    | Distri        | bution (          | of Loans t    | o Farms by      | Gross An  | nual Revo    | enues           |                                      | 2023            |
|----------------------|------------|------------|---------------|-------------------|---------------|-----------------|-----------|--------------|-----------------|--------------------------------------|-----------------|
| Assessment Area:     | Total Loan | s to Farms |               |                   | Farms with Re | venues <= 1MM   |           | Farms with R | Revenues > 1MM  | Farms with Revenues Not<br>Available |                 |
|                      | #          | \$         | % of<br>Total | Overall<br>Market | % Farms       | % Bank<br>Loans | Aggregate | % Farms      | % Bank<br>Loans | % Farms                              | % Bank<br>Loans |
| Lubbock MSA          | 0          | 0          | 0.0           | 383               | 87.0          |                 | 45.7      | 12.1         |                 | 0.9                                  |                 |
| Midland MSA          | 0          | 0          | 0.0           | 57                | 95.3          |                 | 73.7      | 4.7          |                 |                                      |                 |
| Odessa MSA           | 0          | 0          | 0.0           | 15                | 92.3          |                 | 66.6      | 6.8          |                 | 0.9                                  |                 |
| TX Non-MSA           | 54         | 8,062      | 100.0         | 417               | 79.6          | 74.1            | 45.6      | 19.1         | 25.9            | 1.4                                  |                 |
| Total                | 54         | 8,062      | 100.0         | 872               | 87.5          | 74.1            | 47.8      | 11.7         | 25.9            | 0.8                                  |                 |

| Table 12: As     |            | 2024       |               |                   |               |                 |           |            |                 |                                      |                 |
|------------------|------------|------------|---------------|-------------------|---------------|-----------------|-----------|------------|-----------------|--------------------------------------|-----------------|
|                  | Total Loan | s to Farms |               |                   | Farms with Re | venues <= 1MM   |           | Farms with | Revenues > 1MM  | Farms with Revenues Not<br>Available |                 |
| Assessment Area: | #          | \$         | % of<br>Total | Overall<br>Market | % Farms       | % Bank<br>Loans | Aggregate | % Farms    | % Bank<br>Loans | % Farms                              | % Bank<br>Loans |
| Lubbock MSA      | 2          | 399        | 2.4           | 383               | 87.8          | 100.0           | 45.7      | 11.3       |                 | 0.9                                  |                 |
| Midland MSA      | 2          | 425        | 2.4           | 57                | 95.2          | 50.0            | 73.7      | 4.8        | 50.0            |                                      |                 |
| Odessa MSA       | 0          | 0          | 0.0           | 15                | 93.0          |                 | 66.7      | 6.1        |                 | 0.9                                  |                 |
| TX Non-MSA       | 81         | 12,449     | 95.3          | 633               | 80.1          | 69.1            | 47.7      | 18.8       | 30.9            | 1.1                                  |                 |
| Total            | 85         | 13,273     | 100.0         | 1,088             | 87.3          | 69.4            | 48.6      | 11.9       | 30.6            | 0.8                                  |                 |