Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

July 7, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank & Trust Company of McAlester
Charter Number: #5052

235 East Choctaw
McAlester, Oklahoma

Office of the Comptroller of the Currency

8282 S. Memorial Drive, Suite 300
Tulsa, Oklahoma

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.

Contents

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding.**
The lending test is rated: Satisfactory.
The community development test is rated: Outstanding.

The Lending Test and Community Development (CD) ratings are based on the one full-scope assessment area (AA) in the state of Oklahoma. The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of loans were originated or purchased inside the bank's AA.
- The bank exhibits a reasonable geographic distribution of loans.
- The bank exhibits reasonable distribution of loans to individuals of different income levels.
- The bank exhibits excellent responsiveness to the CD needs in the AA.

Loan-to-Deposit Ratio

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

The quarterly LTD ratio since the previous Community Reinvestment Act (CRA) performance evaluation (PE) averaged 70.2 percent. First National Bank & Trust Company of McAlester's LTD ratio had an average high ratio of 73.4 percent in third quarter of 2023. We compared the bank's LTD ratio to four similarly situated banks (peer group banks) located in McAlester, Poteau, Quinton, and Heavener, Oklahoma ranging in total asset sizes of $104 million to $562 million. The peer group bank's average LTD ratio was 68.7 percent with a high average ratio of 82.2 percent and a low average ratio of 54.4 percent.

Lending in Assessment Area

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

The bank originated and purchased 89.1 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.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	22	88.00	3	12.00	25	$4,167,805	72.26	$1,600,000	27.74	$5,767,805
Small Business	27	90.00	3	10.00	30	$5,126,554	67.17	$2,505,119	32.83	$7,631,673
Total	49	89.09	6	10.91	55	$9,294,359	69.36	$4,105,119	30.64	$13,399,478
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*										

Description of Institution

First National Bank & Trust Company of McAlester (FNBM) is a $550 million rural community bank, headquartered in McAlester, Oklahoma. As of December 31, 2024, FNBM had loans of $342 million, or

62 percent of total assets. FNBM is a single-state institution with the main bank facility located in downtown McAlester, Oklahoma. FNBM is a subsidiary of First McAlester Corporation, a single bank holding company headquartered at the main bank address. FNBM operates a non-profit subsidiary community development corporation named First National Development Corporation.

The bank has one rating area located in the state of Oklahoma with one AA comprising all of Pittsburg, Latimer, and LeFlore Counties. The bank operates six branches within its AA: three in McAlester, Oklahoma, including its main branch; one in Hartshorne, Oklahoma; one in Wilburton, Oklahoma; and one in Poteau, Oklahoma. There have been no branch closures or openings since the previous CRA PE. The bank offers reasonable branch hours Monday through Friday with additional hours offered on Saturday at three locations throughout their footprint. The bank also operates seven automated teller machines (ATM).

The bank's primary focus is commercial lending, although a variety of loan and deposit products are available to meet community needs. As of December 31, 2024, tier 1 capital was approximately $60 million, and loans totaled $342 million, or 62 percent of total assets. The loan portfolio included 57 percent commercial loans, 23 percent residential real estate loans, 9 percent agriculture/farm loans, 6 percent construction & development loans, 4 percent consumer loans, and 1 percent other loans. The bank also offers electronic banking services including telephone banking, internet/online banking, and mobile banking.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. A CRA PE was last prepared as of June 27, 2022, and the bank received an overall rating of "Outstanding."

Scope of the Evaluation

FNBM's AA includes the full counties of Pittsburg, Latimer, and LeFlore. FNBM serves Pittsburg County through the main banking location and branch locations in McAlester, Oklahoma and its branch location in Hartshorne, Oklahoma. The bank serves Latimer County through its branch location in Wilburton, Oklahoma and serves LeFlore County through its branch in Poteau, Oklahoma. FNBM's AA received a full-scope review. There are no limited-scope review areas.

Evaluation Period/Products Evaluated

We completed a full-scope review of the FNBM's CRA activities in its AA under the Intermediate Small Bank CRA procedures, which includes the lending test and the CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified CD loans, investments and donations, and services.

Conclusions regarding the lending test are based on samples of small business and residential real estate loans originated from the period beginning January 1, 2022, through December 31, 2024. As of December 31, 2024, loans to small businesses represented 57 percent of total bank loans. For the lending test, we analyzed both home mortgage loans and loans to small businesses. We placed greater weight on loans to small businesses based on the percentage of loan activities, which is consistent with FNBM's lending strategy. Conclusions regarding the CD test are based on the bank's CD activities during the same period.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, 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 the State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. FNBM has only one rating area, the state of Oklahoma, which contains only one AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Outstanding
The lending test is rated: Satisfactory
The community development test is rated: Outstanding

The major factors that support this rating include:

- The bank's performance under the CD test in the AA is Outstanding.
- The bank's geographic distribution of loans reflects reasonable distribution throughout the AA.
- The bank's distribution of loans to individuals of different income levels is reasonable.

Description of Institution's Operations in Oklahoma

FNBM has one AA in the state of Oklahoma, which meets the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income (LMI) geographies. The AA includes all of Pittsburg, Latimer, and LeFlore Counties. The AA consists of 29 census tracts (CT), including 14 in Pittsburg County, 3 in Latimer County, and 12 in LeFlore County. Within the AA, there are five moderate-income CTs, 21 middle-income CTs, two upper-income CTs, and one unknown-income CT. There are no CTs designated as low-income in the AA.

In evaluating the geographic distribution and borrower income criteria under the lending test, the 2022 through 2024 loan data was analyzed and aggregated. Performance tables in appendix D include data covered by the analysis period 2022 through 2024. FNBM currently has seven ATMs and six branches in the AA, with two of the six branches being drive-thru locations. Pittsburg County has four locations, Latimer County has one location, and LeFlore County has one location.

Banking competition is strong in the bank's market area. Banking offices in the market area total 34 and include several commercial state-chartered bank branches of non-local banks. The AA also contains multiple entities such as finance companies, credit unions, and payday lenders that are also competing for various bank services.

Assessment Area - OK Non-MSA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	29	0.00	17.24	72.41	6.90	3.45
Population by Geography	101,346	0.00	12.34	77.44	8.82	1.40
Housing Units by Geography	50,309	0.00	13.29	78.14	8.52	0.05
Owner-Occupied Housing by Geography	28,970	0.00	10.42	79.93	9.63	0.01
Occupied Rental Units by Geography	11,268	0.00	17.30	73.71	8.87	0.12
Vacant Units by Geography	10,071	0.00	17.07	77.96	4.93	0.05
Businesses by Geography	2,967	0.00	20.22	67.27	12.47	0.03
Farms by Geography	220	0.00	6.36	87.73	5.91	0.00
Family Distribution by Income Level	27,680	23.50	19.00	21.05	36.45	0.00
Household Distribution by Income Level	40,238	25.94	16.75	17.92	39.39	0.00
Unemployment rate (%)	6.31	0.00	7.91	6.07	6.29	11.76
Households Below Poverty Level (%)	17.87	0.00	24.95	17.46	12.11	0.00
Median Family Income (Non-MSAs - OK)		$58,565			**Median Housing Value**	$90,000
Median Family Income (Non-MSAs - OK) for 2024		$69,000			**Median Gross Rent**	$665
					Families Below Poverty Level	14.54

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Pittsburg County is in southeastern Oklahoma, and its county seat is the city of McAlester. Other major cities within the county are Haileyville, Hartshorne, and Krebs. The McAlester main bank, two standalone drive-thru facilities, and Hartshorne full-service branch are in Pittsburg County. The main bank and one drive-thru is in a moderate-income CT, while one drive-thru is located in a middle-income CT, and the Hartshorne full-service branch is located in a middle-income CT. There are many large and medium size companies operating in Pittsburg County. The largest industries are government, health care, social assistance, public administration, and retail trade. The largest employers considered in Pittsburg County include McAlester Ammunition Plant, McAlester Regional Health Center, Oklahoma

State Penitentiary and Jacie Brannon Correctional Center, public schools, and the local county and city government. As of December 2024, the unemployment rate for Pittsburg County was 4 percent. This was higher than the state unemployment rate of 3 percent but consistent with the national unemployment rate of 4.1 percent.

Latimer County is also located in southeastern Oklahoma, and its county seat is Wilburton. Nearby towns include Panola and Red Oak. Bank locations include the Wilburton full-service branch with an attached drive thru. The Wilburton full-service branch is in a middle-income CT. The largest industries in Latimer County are agriculture, retail, and educational services. The major employers are Eastern Oklahoma State College and Franklin Electric, Inc. As of December 2024, the unemployment rate in Latimer County was 3.9 percent, which was above the state unemployment rate of 3 percent but consistent with the national unemployment rate of 4.1 percent.

LeFlore County is located near the southeastern border of Oklahoma, and its county seat is Poteau. The bank has a full-service branch located in a middle-income CT that is also designated as a distressed/underserved CT. The largest employers in the area are Carl Albert State College, Eastern Oklahoma Medical Center, OG&E, and Choctaw Nation Rubin White Health Clinic. As of December 2024, the unemployment rate in LeFlore County was 3.6 percent, which is above the state unemployment rate of 3 percent but below the national unemployment rate of 4.1 percent.

As of December 2024, FMBM had the largest market share of deposits within the AA, holding 23.7 percent. The primary competitors for FNBM are The Bank, National Association which holds a 15.7 percent deposit market share, The Community State bank with a 15.3 percent market share, and the First National Bank of Fort Smith with a 12.6 percent market share.

We consulted with one community contact in the AA to gain a better understanding of the general community needs as well as economic conditions. The community contact stated affordable housing was one of the most pertinent needs in the community. The contact also said the type of housing that is needed in the area is not the type of housing currently being built. Many residents in the community are low-income and seniors on fixed incomes. Access to credit on reasonable terms was also difficult to obtain according to our contact. Since many residents in the community are low-income, they tend to have lower credit scores, which means they are often turned away by banks, leading them towards payday lenders.

Scope of Evaluation in Oklahoma

Examiners conducted a full-scope review of the Oklahoma Non-MSA AA consisting of Pittsburg, Latimer, and LeFlore Counties. The Oklahoma Non-MSA AA is the bank's only AA in the state of Oklahoma.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Oklahoma is reasonable.

Distribution of Loans by Income Level of the Geography

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

There are no low-income CTs and only five moderate-income CTs in the AA, which limits the bank's opportunities to make loans in LMI CTs.

Home Mortgage Loans

Refer to table 7 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

The geographic distribution of home mortgage reflects poor distribution. The bank did not originate any loans in moderate-income CTs; however, we noted the strong banking competition in the AA alongside the low number of households located in moderate-income CTs as contributing factors for this performance.

Small Loans to Businesses

Refer to table 9 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's distribution of loans to small businesses was reasonable. The AA does not have any low-income CTs. For moderate-income geographies, the distribution of loans is near both the percentage of small businesses and the aggregate lending to small businesses in moderate-income geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Oklahoma Non-MSA AA consisting of Pittsburg, Latimer, and LeFlore Counties to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's lending activity during the lending period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to table 8 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to LMI borrowers is reasonable. The percentage of loans to low-income borrowers was below the percentage of low-income families in the AA but exceeded the aggregate distribution of low-income borrowers in the AA. The percentage of bank loans to moderate-income borrowers was near the percentage of families in the AA and exceeded the aggregate distribution of moderate-income borrowers in the AA.

Small Loans to Businesses

Refer to table 10 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank's distribution of loans to small businesses by revenue is reasonable. The bank's percentage of loans to small businesses with revenues less than $1 million was near the percentage of small businesses with less than $1 million in revenue in the AA and above the aggregate distribution of loans to those businesses.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's performance test in the state of Oklahoma AA is rated Outstanding

Based on a full-scope the review, the bank exhibits excellent responsiveness to CD needs in the AA through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

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

Table 3: Community Development Loans

Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Oklahoma Non-MSA	8	100%	$6,179	100%

CD lending in the full-scope AA reflects excellent responsiveness to the CD lending and community needs of the AA given its capacity to lend. During the evaluation period, two CD loans totaling $1,788,310 were made to the McAlester Regional Health Center Authority (MRHC) to purchase medical equipment such as an ultrasound machine, magnetic resonance imaging (MRI) machine, and a new cardiac catheterization laboratory. MRHC serves all of Pittsburg and Latimer counties and is also one of the largest employers in McAlester. Another loan totaling $3,172,295 was made to the First National Development Corporation in the form of a loan renewal in addition to the extension of new funds to purchase an ultrasound machine, MRI machine, heating, ventilation and air conditioning (HVAC) expenses, roof replacement, and a vacuum pump system for MRHC.

The following are other examples of CD loans the bank originated or purchased in this AA:
- One loan to IPC Healthcare LLC totaling $518,500 to purchase an existing skilled nursing home facility in Wilburton, Oklahoma (underserved middle-income tract).
- One loan to Southeast Oklahoma Library System totaling $370,400 to purchase a building to house Bookmobile Center, which will allow it to expand its library service area coverage.
- Two loans to local school districts with a majority LMI students totaling $213,430 to purchase equipment used for extracurricular activities.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Oklahoma Non-MSA	11	$32	30	$86	41	100	$118	100	0	0
Total	11	$32	30	$86	41	100	$118	100	0	0

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, including prior period investments that remain outstanding as of the examination date. The bank's level of qualified investments and donations demonstrates adequate responsiveness to the needs of its AA.

During the evaluation period, there were 30 current period donations and 11 prior period investments. Current period donations consist of $28,000 in donations to nine qualifying community service organizations and $58,300 in donations to organizations that revitalize or stabilize LMI geographies.

Described below are some of the most significant qualified investments:
- Donation totaling $25,000 to a multi-county library system that provides materials and resources to provide a non-judgmental atmosphere conducive to informational, recreational, educational, and cultural pursuits by people in the area.
- Donations totaling $9,975 to an organization that provides access to breast health care for uninsured women and men with limited income serving all 77 counties in Oklahoma.
- Donations totaling $8,600 to a nonprofit organization that provides financial assistance for essential needs, clothing, housing, and nutrition.

Extent to Which the Bank Provides Community Development Services

FNBM exhibited excellent responsiveness to CD needs within its AA. During the evaluation period, bank employees provided 646 CD service hours to various organizations within the AA.

Examples of CD services included:
- One senior level bank employee provided approximately 38 hours of financial training to local schools where a majority of students are eligible for free or reduced lunch.

- Three employees serve as board members for multiple organizations including a health center that provides care to LMI individuals and an organization that provides eyeglasses to individuals with limited financial means. Participation in these organizations typically ranges from four to 10 hours each month for each organization.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage loans, small business loans, Community development loans, qualified investments, and community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Oklahoma		
Oklahoma Non-MSA	Full-scope	Counties of Pittsburg, Latimer, and LeFlore

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
First National Bank & Trust Company of McAlester	Satisfactory	Outstanding	Outstanding
State:			
Oklahoma	Satisfactory	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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**.**

Multistate Metropolitan Statistical Area (MMSA): 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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 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/AA. 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 arrogate 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 AA.

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.

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
OK Non-MSA	22	4,167,805	100	3,585	--	--	--	10.42	--	10.46	79.93	71.43	76.74	9.63	28.57	12.80	0.01	--	--
Total	22	4,167,805	100	3,585	--	--	--	10.42	--	10.46	79.93	71.43	76.74	9.63	28.57	12.80	0.01	--	--

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024, Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
OK Non-MSA	22	4,167,805	100	3,585	23.50	13.64	4.91	19.00	18.18	16.74	21.05	27.27	20.75	36.45	40.91	35.17	--	--	22.43
Total	22	4,167,805	100	3,585	23.50	13.64	4.91	19.00	18.18	16.74	21.05	27.27	20.75	36.45	40.91	35.17	--	--	22.43

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
OK Non-MSA	27	7,631,673	100	3,053	--	--	--	20.22	14.81	15.92	67.27	55.56	69.90	12.47	29.63	14.12	0.03	--	0.07
Total	27	7,631,673	100	3,053	--	--	--	20.22	14.81	15.92	67.27	55.56	69.90	12.47	29.63	14.12	0.03	--	0.07

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics,2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
OK Non-MSA	27	7,631,673	100	3,053	73.78	66.67	63.81	10.48	33.33	15.74	--	
Total	27	7,631,673	100	3,053	73.78	66.67	63.81	10.48	33.33	15.74	--	

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%