



PUBLIC DISCLOSURE

August 26, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Shamrock Bank, National Association
Charter Number 12529

101 N. Main Street
Coalgate, Oklahoma 74538

Office of the Comptroller of the Currency

8282 South Memorial Drive
Suite 300
Tulsa, Oklahoma 74133

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending test is rated: Satisfactory.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, market focus, competition, and lending opportunities in the assessment area (AA).
- A majority of loans were originated inside the bank's AA.
- The bank exhibits reasonable geographic distribution of loans in moderate-income census tracts (CTs).
- The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on excellent responsiveness to CD needs in the AAs through CD loans, qualified investments and donations, and CD services in the AAs. The bank's CD activities has a positive impact on the overall lending test ratings.
- The bank did not receive any complaints related to the Community Reinvestment Act (CRA) during the evaluation period.

Loan-to-Deposit Ratio

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

Shamrock Bank's (SBNA or bank) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 58.23 percent. The bank's LTD ratio had a high average of 60.43 percent in the fourth quarter of 2023 and low average of 55.02 percent in second quarter of 2021. We compared the bank's LTD ratio to three similarly situated banks (peer group banks) in their market area ranging in total asset sizes of \$220 million to \$517 million. The aggregate average LTD ratio for competing banks was 84.05 percent, with a low average of 72.85 percent and a high average of 104.04 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AAs).

The bank originated 84.3 percent of its total loans by number and 86.5 percent by dollar inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentages does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area											
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage											
Southern Oklahoma Non MSA											
2021	No Analysis Required										
2022-2023	21	87.5	3	12.5	24	3,755,477	81.7	843,925	18.3	4,599,402	
Oklahoma County – OKC MSA											
2021	No Analysis Required										
2022-2023	No Analysis Required										
Total Home Mortgage	21	87.5	3	12.5	24	3,755,477	81.7	843,925	18.3	4,599,402	
Small Business											
Southern Oklahoma Non MSA											
2021	21	87.5	3	12.5	24	2,446,029	90.9	246,235	9.1	2,692,264	
2022-2023	20	83.3	4	16.7	24	4,438,434	77.1	1,318,158	22.9	5,756,592	
Oklahoma County – OKC MSA											
2021	20	83.3	4	16.7	24	18,223,142	84.0	3,482,400	16.0	21,705,542	
2022-2023	20	80.0	5	20.0	25	14,229,288	94.4	833,596	5.6	15,062,884	
Total Small Business	81	83.5	16	16.5	97	39,336,893	87.0	5,880,389	13.0	45,217,282	
Total Loans	102	84.3	19	15.7	121	43,092,370	86.5	6,724,314	13.5	49,816,684	
<i>Source: Bank Data Due to rounding, totals may not equal 100.0% Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.</i>											

Description of Institution

Shamrock Bank, National Association (SBNA) is a community bank headquartered in Coalgate, Oklahoma, within Coal County, and located in southeastern Oklahoma. SBNA is a subsidiary of Shamrock Bancshares, Inc., a single bank holding company. As of December 31, 2023, the bank reported total assets of \$429 million, with total loans of \$244.3 million (57 percent of total assets) and tier 1 capital of \$44.7 million. The bank's loan portfolio comprises 46 percent commercial/business loans, 32 percent one- to four-family residential mortgage loans, 15 percent agricultural and farmland loans, three percent consumer loans, three percent auto loans, and one percent other loan products. No subsidiaries were considered as part of this evaluation.

For this performance evaluation, SBNA's market area is comprised of two Assessment Areas (AAs), all of Oklahoma County-Oklahoma City MSA AA and the Southern Oklahoma Non MSA AA. The Oklahoma County-Oklahoma City MSA AA consists of the entirety of Oklahoma County while the Southern Oklahoma Non MSA AA consists of the entirety of Atoka, Bryan, Caddo, Coal, Jackson, Kiowa, and Pushmataha counties. Oklahoma County is a county located in the central part of Oklahoma. The county seat is Oklahoma City which is the state capital and largest city. Oklahoma County is at the heart of the Oklahoma City MSA.

Within Southern Oklahoma, the main bank facility is located at 101 N. Main Street, Coalgate, Oklahoma, with six other full-service branches also located throughout this AA. All branch locations include automated teller machines (ATM). The main bank is located in a middle-income census tract (CT), as are

the branches in Caddo, Clayton, Pushmataha, Kiowa, and Bryan counties. The branch located in Jackson County is located in an upper-income CT. All Southern Oklahoma branches have a drive through facility. There are no low-income designated CTs within the Southern Oklahoma AA. Within Oklahoma County, SBNA provides banking services inside the AA with a branch facility in an upper-income CT and located in northern Oklahoma City. No drive through services, safe deposit boxes, or ATM are offered at this location.

There is very strong competition for banking services to meet the credit and deposit needs of the AA. SBNA offers a diverse line of loans and deposit products and services that are primarily focused on serving the financial needs of commercial businesses and consumer customers in its AAs. The bank meets these needs by offering various types of banking services including online banking that allows for deposits, transfers, loan payments, and bill payment. Banking services also includes wire transfers, telephone banking, and mobile banking. Bank lobby and services are provided Monday through Friday at all branch locations. Saturday drive through services are available at all branches except the Pushmataha, Kiowa, and Oklahoma county locations.

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 July 6, 2021, and the bank received an overall rating of "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

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

The OCC compared bank loan data for all applicable years to demographic data using the 2015 U.S. American Community Survey (ACS), 2020 U.S. Census data, Federal Financial Institutions Examination Council adjusted median family income for years 2021, 2022, and 2023 Dun and Bradstreet (D&B) small business demographic, small business data reported under CRA, and 2021 peer mortgage loan data reported under Home Mortgage Disclosure Act.

Conclusions regarding the lending performance are based on samples of commercial small business loans and one- to four-family residential real estate mortgage loans originated during the period January 1, 2021, through December 31, 2021, and January 1, 2022, through December 31, 2023. When evaluating the bank's performance under the lending test, we placed greater weight on commercial small business loans, as this is the bank's primary loan product and represents a larger volume of lending.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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 for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- scope AAs.

Ratings

The bank’s overall rating is based primarily on performance in the AA. As of December 31, 2023, commercial small business loans represented 46 percent of total bank loans and one- to four-family residential real estate mortgage loans represented 32 percent of total loans. For the lending test, we analyzed both commercial small business loans and smaller random samples of home mortgage loans. We placed greater weight on commercial small business loans based on the volume and percentage of loan activity, which is consistent with SBNA’s lending strategy.

SBNA has two AAs in one state. Ratings are based solely on the results of the bank’s AAs.

The state rating is based on performance in the bank’s AA. Refer to the “Scope” section under each 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) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of 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 geographic distribution of loans reflects reasonable distribution throughout the AA.
- The distribution of loans to individuals of different income levels and businesses of different sizes is excellent.
- The bank exhibits excellent responsiveness to community development needs in the AAs through community development loans, qualified investments and donations, and community development services considering the bank's capacity, community needs, and the availability of opportunities for community development in the AAs. The bank's responsiveness had a positive impact on the bank's overall lending test rating.

Description of Institution's Operations in Oklahoma

SBNA has two unique AAs in the state of Oklahoma, one of which is located 117 miles away from its main office in Coalgate, Oklahoma. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

The Southern Oklahoma Non-MSA AA consists of 44 CTs, which includes Atoka, Bryan, Caddo, Coal, Jackson, Kiowa, and Pushmataha counties. There are no low-income designated CTs within the non-MSA AA. The Oklahoma County – OKC MSA AA consists of the entire county and includes 266 CTs.

SBNA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Combined - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	280	10.0	33.9	33.9	19.3	2.9
Population by Geography	894,280	9.0	31.0	35.5	24.1	0.3
Housing Units by Geography	392,576	8.5	32.4	36.0	22.7	0.4
Owner-Occupied Units by Geography	206,688	5.1	24.7	38.8	31.3	0.1
Occupied Rental Units by Geography	137,990	12.7	42.2	31.2	13.1	0.8
Vacant Units by Geography	47,898	11.5	37.8	37.2	12.8	0.6
Businesses by Geography	122,320	6.0	25.9	32.1	32.2	3.8
Farms by Geography	3,416	4.5	21.2	39.4	33.5	1.3
Family Distribution by Income Level	216,588	24.5	18.0	19.2	38.3	0.0
Household Distribution by Income Level	344,678	26.3	17.5	17.6	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$126,936
Median Family Income Non-MSAs - OK		\$51,491	Median Gross Rent			\$775
			Families Below Poverty Level			14.0%

Source: 2015 ACS and 2021 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 A – Demographic Information of the Assessment Area						
Assessment Area: Combined – 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	310	8.4	30.3	33.2	23.2	4.8
Population by Geography	932,819	7.7	30.0	34.9	26.1	1.3
Housing Units by Geography	407,859	7.6	31.3	36.4	23.2	1.5
Owner-Occupied Units by Geography	218,049	4.9	24.4	38.6	31.0	1.1
Occupied Rental Units by Geography	140,994	10.8	40.9	31.7	14.6	2.0
Vacant Units by Geography	48,816	10.0	34.4	40.0	13.6	1.9
Businesses by Geography	164,498	6.0	27.1	30.4	34.5	2.1
Farms by Geography	4,741	4.3	24.0	38.1	32.8	0.8
Family Distribution by Income Level	223,495	23.8	18.7	19.1	38.4	0.0
Household Distribution by Income Level	359,043	26.0	17.2	18.0	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$75,170	Median Housing Value			\$153,226
Median Family Income Non-MSAs - OK		\$58,565	Median Gross Rent			\$877
			Families Below Poverty Level			12.0%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The tables above summarize the demographic characteristics of the CTs that make up the AAs. The tables show the demographic characteristics of the AAs according to the 2015 ACS and 2021 D&B Data, 2020 U.S. Census, 2022 D&B Data, and 2023 D&B Data. The combined counties within the bank's AA have a population of 932,819 and the median housing value was \$153,226. Comparison of the census periods indicate increases in the number of businesses and farms. As of December 31, 2023, the average median family income was \$75,170. There were approximately 12 percent of families living below the poverty level.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) deposit market share report for Atoka, Bryan, Caddo, Coal, Jackson, Kiowa, and Pushmataha counties, SBNA has \$397 thousand in deposits with a deposit market share of 6.42 percent. The bank ranks 2nd out of 28 institutions in the AA. Within the AA, the largest depository institution, First United Bank and Trust Company, has \$3,609 million in deposits with a deposit market share of 58.4 percent.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) deposit market share report for Oklahoma County, SBNA has \$8 thousand in deposits with a deposit market share of 0.02 percent. The bank ranks 57th out of 58 institutions in the AA. Within the AA, the largest depository institutions Midfirst Bank, Bank of Oklahoma, JP Morgan Chase Bank, and Bank of America, had a combined \$26 million in deposits and held a combined 63 percent market share in the AA.

Community Contact

A community contact was consulted with operations in the AA to gain a better understanding of the general banking, developmental, and economic needs of the community. The community contact

primarily serves as an industrial contact for Atoka County and the surrounding area working closely with existing businesses as well as recruiting new business and jobs to diversify the economy. The organization contacted is located in Atoka County (Atoka, OK). The contact indicated that the local economy is volatile and heavily reliant on gas and oil production and drilling and oil and gas have traditionally been the largest industries in the area, although this economic sector is cyclical and experiencing a downturn. Major industries also include health and social services, manufacturing, and educational services. The contact stated that the housing market is very competitive, supply is low and it's difficult for people moving to the area to find housing in Atoka. Multiple organizations currently address housing for low-income earners. The contact also stated that the Choctaw Nation is actively addressing this issue with tribal members by completing ten new homes with 55 units in the planning process. The 55 units available for tribal members will include senior housing, single-family residential, and apartments.

The community contact indicated that the local banks are meeting the credit needs of the area and specifically worked very hard to provide Paycheck Protection Program loans to businesses during the Coronavirus pandemic. The contact noted that local banks are very receptive to community needs and specifically cited two local banks that have historically been strong small business lenders within the community.

Scope of Evaluation in Oklahoma

SBNA has two AAs in the state of Oklahoma consisting of the Oklahoma County – OKC MSA AA and the Southern Oklahoma Non-MSA AA. The rating for Oklahoma is based on full-scope reviews of these two AAs.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Areas

Based on full-scope reviews, the bank's performance in the state of Oklahoma is Satisfactory.

Distribution of Loans by Income Level of the Geography

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

The Southern Oklahoma Non-MSA includes the main office located in Coalgate, Oklahoma. In the non-MSA AA, in year 2021, the bank did not generate a sufficient number of 1-4 family mortgage loans for a meaningful analysis. In the Oklahoma County – OKC MSA AA, in year 2021 and in years 2022-2023 the bank did not generate a sufficient number of 1-4 family mortgage loans for a meaning analysis. Therefore, for the Lending Test analysis, in the Oklahoma County – OKC MSA, we evaluated commercial loans for the periods 2021 and 2022-2023. Also, in the Southern Oklahoma Non-MSA we evaluated 1-4 family mortgage loans for only years 2022 – 2023, as year 2021 did not have a sufficient number of 1-4 mortgage loans, and commercial loans for the periods 2021 and 2022-2023. We placed greater weight on commercial loans made during the 2021 and 2022-2023 evaluation periods, because of the large volume and percentage of this loan product.

There are no low-income designated CTs within the Southern Oklahoma Non-MSA AA. Of the 44 census tracts in the non-MSA AA, nine (20.4 percent) are designated as moderate-income, 30 (68.2 percent) are middle-income, and five (11.4 percent) are upper income.

Home Mortgage Loans

The bank’s geographic distribution of home mortgages was poor.

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

Southern Oklahoma (non-MSA) AA

During the analysis period, in the non-MSA AA for year 2021, the bank originated 16 loans. To perform a meaningful lending test analysis, there must be at least 20 loans originated or purchased for a specific loan product inside the AA. For mortgage loans in this AA, the bank did not originate a sufficient number of loans for a meaningful analysis.

During the 2022-2023 analysis period, there were no low-income CTs in the bank’s non-MSA AA. The distribution of home mortgage loans to moderate-income geographies was poor. The percentage of bank loans in moderate-income geographies was lower than both the percentage of owner-occupied housing units and the aggregate distribution.

Oklahoma County – OKC MSA AA

During the analysis period, in the OKC MSA AA for the year 2021, the bank originated two loans and in years 2022-2023, the bank originated one loan. To perform a meaningful lending test analysis, there must be at least 20 loans originated or purchased for a specific loan product inside the AA. For mortgage loans in this AA, the bank did not originate a sufficient number of loans for a meaningful analysis.

Small Loans to Businesses

The geographic distribution of small business loans to businesses reflects reasonable distribution.

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

Southern Oklahoma Non-MSA AA

During the 2021 analysis period, there were no low-income CTs in the bank’s non-MSA AA. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses was near to the percentage of businesses and exceeded the aggregate distribution.

During the 2022-2023 analysis period, there were no low-income CTs in the bank’s non-MSA AA. The distribution of small loans to businesses in moderate-income geographies was very poor. The percentage of small loans to businesses was significantly lower than the percentage of businesses and the aggregate distribution.

Oklahoma County – OKC MSA AA

During the 2021 analysis period, the distribution of small loans to businesses in low-income geographies was reasonable. The percentage of small loans to business was near to both the percentage of businesses and the aggregate distribution. The percentage of small loans to businesses was somewhat lower than both the percentage of businesses and the aggregate distribution.

During the 2022-2023 analysis period, the distribution of small loans to businesses in low-income geographies was reasonable. The percentage of small loans to business exceeded both the percentage of businesses and the aggregate distribution. The percentage of small loans to businesses was somewhat lower than both the percentage of businesses and the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The bank's distribution of home mortgage loans was excellent.

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

Southern Oklahoma Non-MSA AA

During the analysis period, in the non-MSA AA for year 2021, the bank originated 16 loans. To perform a meaningful lending test analysis, there must be at least 20 loans originated or purchased for a specific loan product inside the AA. For mortgage loans in this AA, the bank did not originate a sufficient number of loans for a meaningful analysis.

During the 2022-2023 analysis period, the distribution of home mortgage loans by the income of the borrower was excellent. The distribution of home mortgage loans to low-income borrowers was lower than the percentage of low-income families and exceeded the aggregate distribution. The percentage of home mortgage to moderate-income borrowers exceeded both the percentage moderate-income families and the aggregate distribution.

Oklahoma County – OKC MSA AA

During the analysis period, in the OKC MSA for the year 2021, the bank originated two loans and in years 2022-2023, the bank originated one loan. To perform a meaningful lending test analysis, there must be at least 20 loans originated or purchased for a specific loan product inside the AA. For mortgage loans in this AA, the bank did not originate a sufficient number of loans for a meaningful analysis.

Small Loans to Businesses

The bank's distribution of small loans to businesses by revenue was excellent.

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

Southern Oklahoma Non-MSA AA

During the 2021 analysis period, the distribution of small loans to businesses by revenue was excellent. The bank's percentage of loans to small businesses with revenues less than \$1 million was near to the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses.

During the 2022-2023 analysis period, the distribution of small loans to businesses by revenue was excellent. The bank's percentage of loans to small businesses with revenues less than \$1 million was near to the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses.

Oklahoma County – OKC MSA AA

During the 2021 analysis period, the distribution of small business loans to businesses by revenue was adequate. The bank's percentage of loans to small businesses with revenues less than \$1 million was lower than the proportion of small businesses and somewhat lower than the aggregate distribution of loans to those businesses.

During the 2022-2023 analysis period, the distribution of small loans to businesses by revenue was excellent. The bank's percentage of loans to small businesses with revenues less than \$1 million exceeded both the proportion of small businesses and the aggregate distribution of loans to those businesses.

Responses to Complaints

SBNA did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT

The bank's performance under the Community Development Test in the state of Oklahoma is rated Outstanding.

Conclusions for Area Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

The Community Development Loan 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.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Southern Oklahoma Non-MSA	1	50.0	1,539	33.7
Oklahoma County - OKC MSA	1	50.0	3,024	66.3

The bank's level of CD lending demonstrates adequate responsiveness, considering the bank's capacity and the need and availability of such opportunities for CD lending in the bank's AA.

Southern Oklahoma Non-MSA AA

During the evaluation period, the bank originated or renewed one CD loan totaling \$1.5 million in the Southern Oklahoma Non-MSA AA. The CD loan was a revitalization loan for the purchase of a 60-lot development in the AA. The development is located in an opportunity zone and developers utilized low-moderate income workers.

Oklahoma County – Oklahoma City MSA AA

During the evaluation period, the bank originated or renewed one CD loan totaling \$3 million in the Oklahoma County – OKC MSA AA. The CD loan was an economic development loan made to construct six industrial warehouses located in a moderate-income census tract that is projected to bring jobs and more small businesses to the area.

Number and Amount of Qualified Investments

The Community Development Investments Table, shown below, sets forth the information and data used to evaluate the bank's level of CD investments and donations. The table includes all CD investments, including prior period investments that remained outstanding at the end of the evaluation period.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Southern Ok Non-MSA	2	2,067	31	755	33	89.2	2,822	44.4	0	0
Ok County OKC MSA	4	3,532	0	0	4	10.8	3,532	55.6	0	0

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

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

Southern Oklahoma Non-MSA AA

The bank's level of qualified investments and donations in the Southern Oklahoma Non-MSA AA reflects excellent responsiveness to the needs of the AA. The bank made two qualified investments in the Southern Oklahoma Non-MSA AA totaling \$2 million in the previous evaluation period that remain outstanding at the end of the evaluation period. The bank also made two qualified investments totaling \$730 thousand and 29 donations totaling \$25 thousand to qualified organizations in the AA during the current evaluation period. Donations were made to local schools and non-profit organizations that provide community services that target low-and moderate -income (LMI) individuals, and to organizations that promote economic development in the AA.

Oklahoma County – Oklahoma City MSA AA

The bank's level of qualified investments in the Oklahoma County – OKC MSA AA reflects excellent responsiveness to the needs of the AA. The bank made four qualified investments in the Oklahoma County – OKC MSA AA totaling \$3.5 million in the previous evaluation period that remain outstanding as of the current examination date.

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services reflects excellent responsiveness within the AAs.

Southern Oklahoma Non-MSA AA

The level of qualified CD services reflects excellent responsiveness in the Southern Oklahoma Non-MSA AA. Ten bank officers and one Board member volunteered their time and serves in leadership positions for 22 different organizations. Bank personnel served in organizations that are involved in economic and small business development activities, affordable housing, community services to LMI families, and revitalization and stabilization. They provide technical expertise and financial assistance to these organizations.

Oklahoma County – Oklahoma City MSA AA

The level of qualified CD services reflects excellent responsiveness in the Oklahoma County – OKC MSA AA. Since 2008, one bank officer employee continues to serve as a Board member for an organization involved in providing housing programs and services to LMI individuals. The bank officer provides financial expertise, budget development, and audit compliance activities to the organization.

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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Commercial Small Business and Home Mortgage Loans Community development loans, qualified investments and donations, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
Southern Oklahoma Non MSA	Full Scope	Atoka, Bryan, Caddo, Coal, Kiowa, Jackson, and Pushmataha Counties
Oklahoma County – OKC MSA	Full Scope	All of Oklahoma County

Appendix B: Summary of MMSA and State Ratings

RATINGS – Shamrock Bank, NA			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating
Shamrock Bank	Satisfactory	Outstanding	Outstanding
State:			
Oklahoma	Satisfactory	Outstanding	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan 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.

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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
Oklahoma County OKC MSA 2021	2	600	11.0	35,614	6.1	0.0	3.4	25.8	0.0	17.9	32.5	50.0	29.4	35.4	50.0	49.1	0.1	0.0	0.2	
Southern OK Non MSA 2021	16	3,092	89.0	3,247	0.0	0.0	0.0	19.2	6.0	16.6	69.3	94.0	67.3	11.5	0.0	16.1	0.0	0.0	0.0	
Total	18	3,692	100.0	38,861	5.1	0.0	3.2	24.7	6.0	17.8	38.8	89.0	32.5	31.3	5.0	46.4	0.1	0.0	0.2	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
Oklahoma County OKC MSA 2022-2023	1	800	5.0	23,386	5.9	0.0	4.5	26.4	0.0	22.8	31.8	0.0	31.2	34.7	100.0	40.6	1.3	0.0	1.0	
Southern OK Non MSA 2022-2023	21	3,755	95.0	2,673	0.0	0.0	0.0	14.8	4.8	14.7	72.6	81.0	70.9	12.6	14.2	14.4	0.0	0.0	0.0	
Total	22	3,755	100.0	26,059	4.9	0.0	4.0	24.4	4.8	22.0	38.6	80.9	35.3	31.0	14.3	37.9	1.1	0.0	0.9	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Oklahoma County OKC MSA 2021	20	18,223	49.0	21,934	6.6	5.0	6.6	25.6	15.0	24.4	29.4	40.0	29.2	34.3	40.0	36.4	4.1	--	3.4
Southern OK Non MSA 2021	21	2,446	51.0	2,260	0.0	--	0.0	28.4	23.8	20.1	62.6	61.9	75.1	9.0	14.3	4.8	0.0	--	0.0
Total	41	20,669	100.0	24,194	6.0	2.5	6.0	25.9	19.5	24.0	32.1	51.2	33.5	32.2	26.8	33.5	3.8	--	3.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Oklahoma County MSA 2022-2023	20	14,229	50.0	20,262	6.5	10.0	5.8	27.3	15.0	26.3	27.4	30.0	26.7	36.5	45.0	39.2	2.2	--	1.9
Southern OK Non MSA 2022-2023	20	4,438	50.0	1,905	0.0	--	0.0	24.5	0.0	19.1	64.1	85.0	72.6	11.4	15.0	8.3	0.0	--	0.0
Total	40	18,667	100.0	22,167	6.0	2.0	5.3	27.1	10.0	25.7	30.4	57.5	30.7	34.5	30.0	36.6	2.1	--	1.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Oklahoma County OKC MSA 2021	2	600	11.0	35,614	24.7	0.0	5.1	17.9	0.0	13.6	19.1	50.0	15.8	38.3	50.0	33.6	0.0	0.0	32.0	
Southern OK Non MSA 2021	16	3092	89.0	3,247	23.5	0.0	3.8	18.6	6.0	11.5	19.9	94.0	19.4	38.0	0.0	42.8	0.0	0.0	22.6	
Total	18	3692	100.0	38,861	24.5	0.0	5.0	18.0	6.0	13.4	19.2	89.0	16.1	38.3	5.0	34.4	0.0	0.0	31.2	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Oklahoma County OKC MSA 2022-2023	1	800	5.0	23,386	24.1	0.0	7.4	18.7	0.0	16.0	18.8	0.0	16.7	38.4	100.0	30.3	0.0	0.0	29.8	
Southern OK Non MSA 2022-2023	21	3,755	95.0	2,673	22.2	9.6	4.2	18.7	23.8	12.8	20.8	33.3	21.0	38.3	33.3	41.3	0.0	0.0	20.8	
Total	22	4,555	100.0	26,059	23.8	9.2	7.0	18.7	22.7	15.6	19.1	31.8	17.1	38.4	36.3	31.4	0.0	0.0	28.8	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma County - OKC MSA 2021	20	18,223	49.0	21,934	89.5	25.8	40.1	3.3	74.2	7.2	--
Southern Oklahoma Non MSA 2021	21	2,446	51.0	2,260	83.5	76.2	51.0	3.7	23.8	12.8	--
Total	41	20,669	100.0	24,194	89.0	68.3	41.2	3.3	31.7	7.6	--

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma County OKC MSA 2022-2023	20	14,229	50.0	20,262	91.8	94.4	51.1	2.5	5.53	5.7	--
Southern Oklahoma Non MSA 2022-2023	20	4,438	50.0	1,905	87.2	77.1	61.3	2.6	22.9	10.2	--
Total	40	18,667	100.0	22,167	91.4	70.0	52.0	2.5	30.0	6.1	--

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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.