

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 16, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Security National Bank of Enid Charter Number 14315

> 201 West Broadway Enid, OK 73702

Office of the Comptroller of the Currency

8282 South Memorial Drive Suite 300 Tulsa, OK 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: Outstanding.

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 excellent 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 AA through CD loans and CD services and adequate qualified investments and donations in the AA.
- 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, the bank's LTD ratio is reasonable.

The Security National Bank of Enid's (SNB) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 55.53 percent. The bank's LTD ratio had a high average of 59.74 percent in the third quarter of 2023 and low average of 50.02 percent in fourth quarter 2021. We compared the bank's LTD ratio to three similarly situated banks (peer group banks) in their market areas ranging in total asset sizes of \$55 million to \$361 million. The aggregate average LTD ratio for competing banks was 71.13 percent, with a low average of 55.24 percent and a high average of 80.44 percent.

Lending in Assessment Area

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

The bank originated or purchased 79.5 percent of its total loans by number and 76.3 percent by dollar inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the

Table I) - L	ending	g Insi	de and	Outsic	le of the As	sessme	ent Area		
	Ν	umber	of L	oans		Dolla	r Amo	unt of Loan	S	
Loan Category	In	side	Ou	tside	Total	Inside)	Outsic	le	Total
	#	%	#	%	#	\$	%	\$	%	\$
Home Mortgage										-
Garfield County Enid MSA										
2021	99	79.2	26	20.8	125	17,134,519	68.5	7,879,050	31.5	25,013,569
2022	56	77.8	16	22.2	72	12,051,117	78.7	3,265,000	21.3	15,316,117
2023	38	76.0	12	24.0	50	5,838,780	65.7	3,048,076	34.3	8,886,856
Total Home Mortgage	193	78.14	54	21.86	247	35,024,416	71.16	14,192,126	28.84	49,216,542
Small Business										
Garfield County Enid MSA										
2021	20	87.0	3	13.0	23	6,978,459	97.7	168,000	2.3	7,146,459
2022-2023	20	87.0	3	13.0	23	5,248,374	95.0	278,555	5.0	5,526,929
Total Small Business	40	87.0	6	13.0	46	12,226,833	96.5	446,555	3.5	12,673,388
Total Loans	233	79.5	60	20.5	293	47,251,249	76.3	14,638,681	23.7	61,888,930
Source: Bank Data Due to rounding, totals may not equal 100.0%	6									

AA level. The percentages do not include extensions of credit by affiliates that may be considered under the other performance criteria.

Description of Institution

SNB is a community bank headquartered in Enid, Oklahoma, within Garfield County, and located in northwestern Oklahoma. The bank is a wholly owned subsidiary of Security Financial Services Corporation, a one bank holding company located in Enid, Oklahoma. As of December 31, 2023, the bank reported total assets of \$375 million, with total loans of \$203 million (54 percent of total assets) and tier 1 capital of \$33 million. The bank's loan portfolio comprises 45 percent commercial/business loans, 43 percent one- to four-family residential mortgage loans, 4 percent agricultural and farmland loans, a combined 1 percent in consumer and auto loans, and 7 percent other loan products. No subsidiaries were considered as part of this evaluation.

The bank's market area consists of Garfield County, a metropolitan statistical area (MSA) located in north central Oklahoma. SNB's AA has 17 CTs. One CT is designated low-income (5 percent), two CTs are designated moderate-income (10 percent), 57 percent are designated middle-income, and 29 percent are designated as upper income in the AA. Garfield County has 15 cities/towns. The largest city and county seat is Enid. SNB has three branches (including the main office), two branches with lobby and drive-through lanes and three automated teller machines (ATMs) located in Enid, Oklahoma. Each branch location has a non-deposit taking drive-up ATM. A walk-up non-deposit taking ATM is in the lobby of the main bank location. There have been no branch closures since the previous CRA examination. There were no merger or acquisition activities that affected the bank's operations during the evaluation period.

Within the AA there are 16 financial institutions (14 banks and two credits unions) providing banking services to meet the credit and deposit needs of the AA. SNB has the second largest deposit market share of the banks in the AA. SNB is a full-service banking institution offering a full range of commercial, real estate, agriculture, and consumer credit products. Bank services also include internet banking, online bill pay, wire transfers, touchtone banking, and remote deposit capture. Bank lobby and services are provided Monday through Friday at all branch locations. Saturday lobby and drive in services are available at the west branch location. The bank's primary competitors include Stride Bank NA, Cowboy Bank (formerly Bank of Kremlin) and Tinker Federal Credit Union.

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 September 13, 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 SNB's CRA activities in its AA under the Intermediate Small Bank CRA procedures, which include the lending test and the community development test. The lending test evaluates SNB's record of meeting the credit needs of the bank's AA through its lending activities.

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, 2021, 2022, and 2023 Dun and Bradstreet (D&B) small business demographic, and small business data reported under CRA, and 2021 peer mortgage loan data reported under Home Mortgage Disclosure Act (HMDA).

Conclusions regarding the lending performance are based on HMDA data collected from January 1, 2021, through December 31, 2023, and samples of commercial small business loans originated during the same period. In evaluating the income level of geography and income level of borrower criteria under the lending test, year 2021 data was evaluated separately from years 2022-2023 due to changes in recent updates to HMDA data in year 2021. 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.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area 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 45 percent of total bank loans and one- to four-family residential real estate mortgage loans represented 43 percent of total loans. For the lending test, we analyzed a random sample of commercial small business loans. We also completed a data-integrity examination to assess the accuracy of the data reported on the bank's HMDA loan application register (LAR) for calendar years 2021, 2022, and 2023. We placed greater weight on commercial small business loans based on the volume and percentage of loan activity. Lastly, for the overall lending test rating, we placed more weight on years 2022 and 2023 as it represented the greatest percentage of loan activities for each loan product.

SNB has one AA in one state. Ratings are based solely on the results of the bank's AA.

The MMSA rating and state ratings are based on performance in the bank's AA. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Data Integrity

We performed a HMDA data integrity review in second quarter 2024 (as of 12/31/2023) prior to the CRA evaluation to assess the reliability of loan data subject to the HMDA reporting requirements. We performed transaction testing of one- to four-family residential real estate loans reported on the HMDA LAR. We found data for all years to be reliable. As a result, we relied on filed HMDA data for this CRA evaluation to assess SNB's one- to four-family residential real estate lending performance.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), 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 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: Outstanding.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent 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 CD needs in the AA through CD loans, qualified investments and donations, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD in the AA.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Oklahoma

SNB Enid has one AA in the state of Oklahoma. SNB's AA consists of 17 CTs all located in Garfield County, a MSA located in north central Oklahoma. There were no low-income designated CTs in the AA during the year 2021.

Table A – I	Demograp	ohic Informa	ation of the As	sessment Area		
As	sessment	Area: Garfi	eld County AA	A 2021		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0
Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	5,521	0.0	30.6	41.2	28.1	0.0
Farms by Geography	335	0.0	17.6	43.3	39.1	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$57,419	Median Housi	ng Value		\$97,211
			Median Gross	Rent		\$746
			Families Belov	w Poverty Level		9.9%

<u>SNB ENID MSA AA</u>

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

Assessment	Area: Ga	rfield Cour	nty AA 2023			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	5.9	11.8	52.9	29.4	0.0
Population by Geography	62,846	5.1	10.1	56.2	28.7	0.
Housing Units by Geography	26,776	6.4	10.4	54.7	28.6	0.0
Owner-Occupied Units by Geography	15,501	3.2	7.7	54.3	34.8	0.0
Occupied Rental Units by Geography	8,208	11.6	14.2	53.6	20.6	0.0
Vacant Units by Geography	3,067	8.2	13.8	59.4	18.7	0.0
Businesses by Geography	6,799	1.2	7.0	59.8	32.0	0.0
Farms by Geography	392	0.3	2.6	54.1	43.1	0.0
Family Distribution by Income Level	15,145	22.0	15.0	21.3	41.8	0.0
Household Distribution by Income Level	23,709	25.1	14.6	20.2	40.1	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$65,663	Median Housi	ng Value		\$120,483
			Median Gross	Rent		\$832
			Families Belo	w Poverty Le	evel	12.2%

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

The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderateincome geographies. The tables above summarize the demographic characteristics of the CTs that make up the AA. The tables show the demographic characteristics of the AAs according to the 2015 ACS and 2021 D&B Data, 2020 U.S. Census, and 2023 D&B Data. The county within the bank's AA had a population of 62,846 and the median housing value was \$120,483. 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 \$65,663. 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 Garfield County, SNB has \$346 million in deposits with a deposit market share of 9.13 percent. The bank ranks second out of 14 institutions in the AA. Within the AA, the largest depository institution, Stride Bank, NA, has \$2.7 billion in deposits with a deposit market share of 70.27 percent.

Community Contacts

A community contact was consulted with operations in the AA to gain a better understanding of the general banking, developmental, and local economic needs of the community. The contact is a community action agency located in Enid, OK that works to improve the lives of low-income families and serves both Garfield and Grant counties. The contact noted the greatest areas of need in the AA are affordable houses to rent, safer neighborhoods, sidewalks, parks, and assistance for home repairs and utility bills. The

community action agency is working to increase the supply of high-quality affordable rentals using HOME Investment Partnership Program funding.

The community contact noted the community is seeing an increase in unsheltered individuals due to rising housing costs, as well as an increase in persons with mental health issues. Job training programs struggle to obtain participants. The contact also noted that internet access is a challenge for low-and moderate-income (LMI) individuals. The contact stated that the state of Oklahoma has created a program to identify a pipeline of remote jobs, but without digital access and computers it will be hard for LMI individuals to obtain this type of work. The lack of affordable childcare was also identified as an obstacle to assisting people into job training programs.

Additionally, the community contact stated that there are ample opportunities for financial institution involvement with CD services, providing grants that support community programs, and funding for childcare initiatives. The contact noted that SNB and other institutions are actively involved in supporting the community and that bank staff are serving on local boards and committees, providing financial education to students to include assistance with opening bank accounts, and are supportive of various United Way programs.

Scope of Evaluation in Oklahoma

SNB has one AA in the state of Oklahoma consisting of the Garfield County – Enid MSA AA. The rating for Oklahoma is based on a full-scope review of this AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OKLAHOMA

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The bank's geographic distribution of home mortgages was excellent.

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

During the 2021 analysis period, the distribution of home mortgage loans to moderate-income geographies was poor. There were no low-income CTs in the bank's Enid MSA AA. The percentage of loans in moderate-income geographies was lower than both the percentage of owner-occupied housing units and the aggregate distribution.

During the 2022-2023 analysis period, the distribution of home mortgage loans to low-income geographies was excellent. The percentage of home mortgage loans in low-income geographies was somewhat lower than the percentage of owner-occupied housing units and exceeds the aggregate distribution. The distribution of home mortgage loans to moderate-income geographies was excellent. The percentage of loans in moderate-income geographies was equal to the percentage of owner-occupied housing units and exceeds the aggregate distribution.

Small Loans to Businesses

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

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

During the 2021 analysis period, the distribution of small loans to businesses in moderate-income geographies was excellent. There were no low-income CTs in the bank's Enid MSA AA. The percentage of small loans to businesses in moderate-income geographies was equal to the percentage of businesses and exceeds the aggregate distribution.

During the 2022-2023 analysis period, the bank did not originate any small business loans in low-income geographies in proportion to 1.2 percent of businesses and 1.1 percent aggregate distribution. Based on the low volume of small businesses and the low number of CTs in low-income geographies, the bank's performance is considered reasonable. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeds both the percentage of businesses and the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an 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 is reasonable.

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

During the 2021 analysis period, the distribution of home mortgages by the income of the borrower was reasonable. The percentage of home mortgage loans to low-income borrowers was somewhat lower than the percentage of low-income families and exceeds the aggregate distribution. The distribution of home mortgage loans to moderate-income borrowers was reasonable. The percentage of home mortgage loans was somewhat lower than the percentage of families and near to the aggregate distribution.

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

Small Loans to Businesses

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

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

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 revenue less than \$1 million was near to the proportion of small businesses and exceeds 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 revenue less than \$1 million was near to the proportion of small businesses and exceeds the aggregate distribution of loans to those businesses.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test in the state of Oklahoma is rated outstanding.

Conclusions for Area Receiving Full-Scope Reviews

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans services, and adequate qualified investments and donations, 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

Refer to the Community Development Loan table below for the facts 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.

	Commun	ity Development L	loans	
		То	otal	
Assessment Area	#	% of Total #	\$(000's)	% of Total \$
Enid, OK MSA AA	26	100.0	14,903	100.0

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

Garfield County – Enid MSA AA

During the evaluation period, the bank originated or renewed 26 CD loans totaling \$14.9 million in the Garfield County – Enid MSA AA. These loans included 16 loans totaling \$13.1 million for community

services, eight loans totaling \$1.8 million to revitalize and stabilize designated areas within the AA, and two loans totaling \$109 thousand for economic development.

Number and Amount of Qualified Investments

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

				Qualified I	nvest	ments				
		Prior	Curr	ent Period		r	Fotal		Uni	funded
Assessment Area]	Period*							Comm	itments**
	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)
						Total #		Total \$		
Enid, OK MSA AA	0	0	93	\$98	93	100.0	\$98	100.0	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.

Garfield County – Enid MSA AA

The bank's level of qualified donations and investments in the Garfield County – Enid MSA AA reflects adequate responsiveness to the needs of the AA. During the evaluation period, SNB granted 93 investments and donations totaling \$98 thousand. These investments and donations supported affordable housing, community services, economic development, and revitalization/stabilization. These investments and donations were responsive to affordable housing needs.

Extent to Which the Bank Provides Community Development Services

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

Garfield County – Enid MSA AA

Bank officers and employees provided a total of 1,993 hours of service with a majority providing CD services that benefit LMI individuals, which is considered excellent performance in the Garfield County – Enid MSA AA. There were 13 bank officers, and two board members volunteered their time and services in leadership positions for 32 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.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Commercial Small Business a	nd Home Mortgage Loans
	Community development loan	s, qualified investments and donations, CD services
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type o	f Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
Garfield County – Enid MSA AA	Full Scope	All of Garfield County

Appendix B: Summary of MMSA and State Ratings

RA	TINGS – Security N	National Bank of Eni	d, NA
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating
SNB Enid	Outstanding	Outstanding	Outstanding
State:			
Oklahoma	Outstanding	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.

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.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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.

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 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 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.

Charter Number: 14315

	ſ	fotal Home Mo	rtgage l	Loans	Low-	Income	Tracts	Moderat	e-Incon	e Tracts	Middle	-Incom	e Tracts	Upper	-Incom	e Tracts	Not Av	ailable- Tracts	
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregat
Garfield County - Enid MSA AA 2021	99	17,134,519	100.0	1,860	0.0	0.0	0.0	26.6	4.0	12.2	40.3	39.4	43.7	33.2	56.6	44.1	0.0	0.0	0.0
Total	99	17,134,519	100.0	1,860	0.0	0.0	0.0	26.6	4.0	12.2	40.3	39.4	43.7	33.2	56.6	44.1	0.0	0.0	0.0

The Security National Bank (14315) excluded from Aggregate.

	Total Home Mortgage Loan				Low-	Income	Tracts	Modera	te-Incon	ne Tracts	Middle	-Incom	e Tracts	Upper	-Income	e Tracts		ailable- Tracts	Income
Assessment Area:	#	\$					Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		
Garfield County – Enid MSA 2022-2023	94	17,889,897	100.0	1,145	3.2	2.1	1.9	7.7	7.4	5.0	54.3	40.4	53.5	34.8	50.0	39.6	0.0	0.0	0.0
Total	94	17,889,897	100.0	1,145	3.2	2.1	1.9	7.7	7.4	5.0	54.3	40.4	53.5	34.8	50.0	39.6	0.0	0.0	0.0

	1	otal Loa Bus	ans to Si inesses	mall	Low-]	ncome	Tracts	Moderat	e-Incon	e Tracts	Middle	Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inc	ome Tract
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregat									
Garfield County-Enid MSA AA 2021	20	6,978	97.7	827	0.0		0.0	30.6	30.0	26.6	41.2	40.0	42.1	28.1	30.0	29.6	0.0		1.7
Total	20	6,978	97.7	827	0.0		0.0	30.6	30.0	26.6	41.2	40.0	42.1	28.1	30.0	29.6	0.0		1.7

	T	Fotal Lo Bus	ans to inesses		Low-I	ncome	Fracts	Moderat	e-Incon	ne Tracts	Middle	-Income	Tracts	Upper	-Income	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate												
Garfield County – Enid MSA 2022-2023		5,248	95.0	918	1.2	0.0	1.1	7.0	25.0	6.1	59.8	50.0	58.0	32.0	25.0	32.6	0.0		2.2
Total	20	5,248	95.0	918	1.2	0.0	1.1	7.0	25.0	6.1	59.8	50.0	58.0	32.0	25.0	32.6	0.0		2.2

The Security National Bank (14315) excluded from Aggregate

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	Aggregat
Garfield County – Enid MSA AA 2021	99	17,134,519	100.0	1,860	19.0	8.1	6.3	19.9	15.2	16.7	22.3	28.3	18.7	38.8	46.5	24.1	0.0	2.0	34.2
Total	99	17,134,519	100.0	1,860	19.0	8.1	6.3	19.9	15.2	16.7	22.3	28.3	18.7	38.8	46.5	24.1	0.0	2.0	34.2

		Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Garfield County Enid MSA 2022-2023	94	17,889,897	100.0	1,145	22.0	7.4	10.5	15.0	9.6	21.4	21.3	25.5	21.3	41.8	47.9	23.3	0.0	9.6	23.5
Total	94	17,889,897	100.0	1,145	22.0	7.4	10.5	15.0	9.6	21.4	21.3	25.5	21.3	41.8	47.9	23.3	0.0	9.6	23.5

		Fotal Loans to	Small Businesse	s	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Garfield County – Enid MSA AA 2021	20	6,978	97.7	827	85.4	80.0	50.9	4.1	20.0	10.5	
Total	20	6,978	97.7	827	85.4	80.0	50.9	4.1	20.0	10.5	

The Security National Bank (14315) excluded from Aggregate

		Total Loans to	Small Businesse	s	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Garfield County – Enid MSA 2022-2023	20	5,248	95.0	918	87.7	78.6	58.0	3.2	21.4	9.0		
Total	20	5,248	95.0	918	87.7	78.6	58.0	3.2	21.4	9.0		