



PUBLIC DISCLOSURE

July 22, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fidelity Bank, N.A.
Charter Number: 25188

100 E. English Street
Wichita, KS 67202

Office of the Comptroller of the Currency

2959 North Rock Road, Suite 510
Wichita, KS 67226

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of Fidelity Bank, N.A. (Fidelity) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Fidelity Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on High Satisfactory ratings in both states.
- The Investment Test rating is based on Outstanding ratings in both states.
- The Service Test rating is based on High Satisfactory ratings in both states.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in in its assessment areas (AA).

The bank originated and purchased 54.6 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Fidelity’s business strategy of purchasing loans provided by a third-party as well as its National Lending Program impacts the inside/outside analysis since many of these loans are to borrowers outside of the AAs.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	5,474	49.2	5,658	50.8	11,132	1,295,202	53.9	1,109,832	46.1	2,405,035
Small Business	1,748	83.5	346	16.5	2,094	299,770	80.4	73,168	19.6	372,938
Small Farm	3	60.0	2	40.0	5	532	83.5	105	16.5	637
Total	7,225	54.6	6,006	45.4	13,231	1,595,504	57.4	1,183,105	42.6	2,778,610

The bank's home mortgage and small business lending volumes are sufficient to conduct an analysis of the geographic distribution of these loan products. The low volume of small farm loans does not allow for a meaningful analysis of geographic distribution.

Description of Institution

Fidelity Bank is a \$3.2 billion interstate financial institution headquartered in Wichita, Kansas. The bank is a wholly owned subsidiary of Fidelity Financial Corporation, a holding company in Wichita, Kansas. The bank converted from a federally chartered thrift to a National Bank in September 2019. The bank has no affiliates requiring consideration for CRA activities.

Fidelity is a full-service banking institution that offers a broad range of banking services through operations in Kansas and Oklahoma. Fidelity offers commercial, real estate, and consumer credit products, with the bank's primary lending activities focusing on residential real estate mortgage lending. Fidelity also has an active loan servicing portfolio among its business lines. As of December 31, 2023, total loans represent 77 percent of the bank's total assets. The bank's \$2.5 billion loan portfolio consisted of 86.9 percent real estate loans, 8.1 commercial and industrial loans, 4.9 percent loans to individuals, and 0.2 percent other loans. Tier 1 capital totaled \$301.3 million, as of December 31, 2023.

Fidelity has delineated four AAs, two in Kansas (Sedgwick County and Johnson County) and three in Oklahoma (Oklahoma County, Tulsa County, and Mayes County). The Mayes County AA was added on October 25, 2021, through the acquisition of Yorktown Bank, and subsequently removed as an AA effective August 18, 2023, due to the sale of the two bank branches located in Mayes County. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. The OCC assigned a rating of "Satisfactory" at the bank's last CRA evaluation, dated October 5, 2020.

As of December 31, 2023, Fidelity operates 17 full-service branch locations, nine automated-teller machines (ATMs), and 39 Interactive Banking Machines (IBMs) throughout the AAs in Kansas and Oklahoma. Fidelity has 12 branches in Kansas and five branches in Oklahoma. Since the prior CRA evaluation, the bank closed six branches and sold two branches to another institution.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated Fidelity Bank using the Community Reinvestment Act Large Bank examination procedures, including a Lending Test, Investment Test, and Service Test. Examiners evaluated home mortgage loans, small loans to businesses, community development (CD) loans, qualified investments, and CD and retail services between January 1, 2020, and December 31, 2023.

Due to updated American Community Survey (ACS) Census data, 2020 census tract income level designation changes became effective January 1, 2022. Examiners evaluated Fidelity's loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage and small business loan data from January 1, 2020, through December 31, 2021 (2020-2021 evaluation period), using 2015 ACS demographic information. Examiners analyzed home mortgage and small business loan data from January 1, 2022, through December 31, 2023 (2022-2023 evaluation period), using 2020 U.S. Census demographic information.

Lending Test

Each AA was evaluated based on its primary lending product(s). The primary lending products for all AAs included home mortgage loans and small business loans. The bank did not originate or purchase a sufficient volume of farm loans in any AA to allow for a meaningful analysis. To assess Fidelity's lending performance, examiners evaluated the bank's HMDA and CRA data for 2020-2023. Examiners gave more weight to the 2020-2021 lending period due to Fidelity having greater origination volumes than in 2022-2023. Each AA was evaluated with proportionate weight assigned to its primary lending product. Examiners considered qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States that occurred during the evaluation period.

Examiners determined lending activity responsiveness in each AA by comparing the bank's market rank percentage for deposits to each lending product's market rank percentage. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage and small business lenders within the AA.

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated examiners consider one component more than the other. When there were differences in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount. When there were performance differences between low- and moderate-income geographies, examiners placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). Examiners described any variations within the narrative comments of each rating area. For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families.

Consideration was given to the number and dollar volume of CD loans, with emphasis placed on loans that were particularly responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. To provide perspective, CD lending volume was compared to the quarterly average of tier 1 capital over the evaluation period allocated to the AA based on the pro rata share of bank deposits attributed to that area.

Investment Test

The analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as its primary purpose. Qualified investments included investments which met the definition of CD that were made in the current evaluation period or prior to the current evaluation period and were still outstanding. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. Fidelity received consideration for any qualified investment activity that benefited a specific AA in the applicable state rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to the quarterly average of tier 1 capital over the evaluation period allocated to each AA based on its pro rata share of deposits.

Service Test

The review of services during the evaluation period included analyzing Fidelity's network of branches and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services to geographies and individuals of different income levels. The analysis of the distribution of the bank's retail branches was based on locations as of December 31, 2023. Income category classifications were based on the 2020 U.S. Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted solely from a geography's income classification changing from the 2015 ACS to the 2020 U.S. Census.

Fidelity supplements traditional service delivery methods with alternative delivery processes, including ATMs, IBMs, internet banking services, and a free mobile banking application that allows customer to make mobile deposits. The mobile banking feature includes a mobile wallet that allows payments via Apple Pay, Samsung Pay, and Android Pay at the merchant's point of sale, if enabled. Customers can use smartphones to transfer funds to other people using Zelle and open/apply for a new account for some loan and deposit products. Customers can use their bank debit card, surcharge-free, at any Allpoint or MoneyPass ATM nationwide, or at any ATM or merchant that accepts Visa.

Examiners also considered the extent and innovativeness of Fidelity's CD services in meeting the credit needs within its AAs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA

AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

Fidelity’s overall rating is a blend of the state ratings. Performance in the state of Kansas received the most weight in the overall rating. The Federal Deposit Insurance Corporation’s (FDIC) Summary of Deposits dated June 30, 2023, reflected the state of Kansas accounted for 88 percent of Fidelity’s deposits and 65 percent of branch offices. Loans made within the state of Kansas represented 84 percent of the bank’s lending. As a result, we gave more weight to the State of Kansas when arriving at conclusions.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope of Evaluation” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Ratings

State of Kansas

CRA rating for the State of Kansas: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The institution had an excellent level of qualified CD investment and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- The bank was a leader in providing CD services.

Description of Institution's Operations in Kansas

Fidelity has two AAs in the state of Kansas. The AAs consist of the Sedgwick County AA which is a part of the Wichita, KS MSA, and the Johnson County AA which is part of the Kansas City, MO-KS MSA. The Sedgwick County AA is the bank's largest AA in the state of Kansas. As of December 31, 2023, Fidelity operated 12 branches, five ATMs, and 32 IBMs in the state of Kansas. The Sedgwick County AA contains 11 of the 12 branch locations. The bank closed two branches in August 2022 and one branch in July 2023 in the Sedgwick County AA.

Fidelity had total deposits in the state of Kansas of \$2.4 billion as of June 30, 2023. Branches in the Sedgwick County AA held deposits of \$2.3 billion as of June 30, 2023, placing Fidelity third in deposit market share with 12.3 percent of all deposits.

Sedgwick County AA

The following tables provide a summary of the demographic profile of the Sedgwick County AA by categorizing the AA characteristics into their respective census tracts based on income level for each of the evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Sedgwick County KS AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	12.1	29.0	27.4	31.5	0.0
Population by Geography	506,529	9.3	24.9	28.5	37.2	0.0
Housing Units by Geography	213,700	10.4	26.8	29.4	33.4	0.0
Owner-Occupied Units by Geography	123,624	5.8	19.6	29.0	45.6	0.0
Occupied Rental Units by Geography	69,337	16.1	36.1	31.6	16.2	0.0
Vacant Units by Geography	20,739	18.7	39.2	24.0	18.1	0.0
Businesses by Geography	36,443	5.9	26.9	26.2	41.0	0.0
Farms by Geography	1,139	4.0	14.7	21.4	59.9	0.0
Family Distribution by Income Level	124,645	21.7	17.7	20.9	39.8	0.0
Household Distribution by Income Level	192,961	24.3	16.8	18.3	40.6	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housing Value			\$123,957
			Median Gross Rent			\$745
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2021 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Sedgwick County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	5.9	31.1	36.3	25.2	1.5
Population by Geography	523,824	3.8	27.7	36.2	31.6	0.7
Housing Units by Geography	220,638	4.7	30.9	36.0	27.3	1.1
Owner-Occupied Units by Geography	124,213	2.1	21.6	40.2	36.0	0.2
Occupied Rental Units by Geography	75,107	7.5	42.4	31.9	15.9	2.3
Vacant Units by Geography	21,318	10.0	44.4	26.0	17.1	2.4
Businesses by Geography	43,937	2.6	22.2	31.8	40.2	3.2
Farms by Geography	1,380	1.2	15.9	33.7	47.8	1.3
Family Distribution by Income Level	126,223	20.3	18.6	21.0	40.1	0.0
Household Distribution by Income Level	199,320	23.6	17.6	17.7	41.1	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$74,120	Median Housing Value			\$142,797
			Median Gross Rent			\$838
			Families Below Poverty Level			9.2%
<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>						

Economic Data

Data from Moody's Analytics June 2024 report shows Wichita, Kansas' top employers include Spirit AeroSystems, Textron Aviation, McConnell Air Force Base, and Ascension Via Christi. Manufacturing accounts for the largest sector of employment at 16.8 percent of total employment, followed by education and health services at 15.1 percent, and government employees at 14 percent. Strengths of Wichita's economy include low costs of living and doing business, and manufacturing that serves a global market. As the home for McConnell Air Force Base, military and defense contractors help to stabilize the economy in Wichita, which is particularly reliant on defense work as a source for mid- and high-wage jobs.

Utilizing data from the US Bureau of Labor Statistics, the unemployment rate for Sedgwick County has trended down over the evaluation period. The June 2024 unemployment statistics show Sedgwick County had unemployment of 4 percent, an increase from 3.1 percent noted in June 2023, and 3.2 percent in June 2022. Unemployment rates have dropped from 5.5 percent in June 2021 and are considerably lower than the 11.5 percent unemployment rate in June 2020. According to the U.S. Census Bureau, the median household income in Sedgwick County from 2018-2022 was \$65,372, just below the median for the state of Kansas of \$69,747 and below the national median of \$75,149. Median monthly owner costs with a mortgage for 2018-2022 in Sedgwick County was \$1,474, which was below the Kansas median of \$1,580 and the national median of \$1,828. Median gross rent for Sedgwick County for 2018-2022 was \$937, which was similar to the Kansas median of \$986 and the national median of \$1,268.

Examiners utilized existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Sedgwick County AA to address those needs. Contacts noted that the local economy was hit hard during the COVID-19 pandemic, with layoffs affecting the manufacturing sector; however, economic trends locally have stabilized from the impact of the pandemic. All contacts noted that local financial institutions are receptive to community needs and do a good job in serving the credit needs of the community. The contacts also noted that the institutions provide volunteer support to various organizations throughout the City of Wichita.

Housing

According to the ACS U.S. Census demographic data, during the evaluation period, median housing values in the Sedgwick County AA increased 15.3 percent from \$124,000 in 2021 to \$143,000 in 2023, and median gross rent increased 12.5 percent from \$745 in 2021 to \$838 in 2023 in the AA. Based upon the median family income taken from the demographic data in the provided tables above for each respective lending analysis period (2020-2021 or 2022-2023), examiners determined low-income families earned up to \$32,166 or \$37,060, and moderate-income families earned \$51,465 or \$59,296 per year. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Using this analysis, the maximum monthly payment for low-income families would be \$804 or \$927, and \$1,287 or \$1,482 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA's median housing value would be \$665 or \$767.

Scope of Evaluation in Kansas

Examiners performed a full-scope review of the Sedgwick County AA and a limited-scope review of the Johnson County AA. The Sedgwick County AA held 97.8 percent of Fidelity's deposits in Kansas as of June 30, 2023, and originated 78.7 percent of all loans originated in Kansas AAs during the evaluation period. Examiners weighted home mortgage lending more heavily than small business lending, as home mortgage lending represented 74.2 percent of the number and 76.4 percent of the dollar volume of all loans originated in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sedgwick County AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full Scope:							
Sedgwick County	3,619	1,205	1	50	4,875	78.7	97.8
Limited Scope:							
Johnson County	1,266	50	0	5	1,321	21.3	2.2
Total	4,885	1,255	1	55	6,196	100.0	100.0

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Full Scope:							
Sedgwick County	768,407	187,617	35	49,332	1,005,391	71.9	97.8
Limited Scope:							
Johnson County	380,126	9,910	0	2,258	392,294	28.1	2.2
Total	1,148,533	197,527	35	51,590	1,397,685	100.0	100.0

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

As of June 30, 2023, Fidelity ranked third among 38 institutions in the market, with a deposit market share of 12.3 percent, placing it in the top 8 percent of deposit taking institutions.

Home mortgage lending activity in the Sedgwick County AA is excellent. The most recent market share data (2022) for home mortgage lending shows that Fidelity ranked first among 356 lenders in the market

with 5.2 percent of the total dollar volume of loans in the AA, and third in the market for the number of loans made at 4.9 percent of the market share, placing it in the top 1 percent of home mortgage lenders.

Small business lending activity in the Sedgwick County AA is good. Fidelity originated 1,205 loans totaling \$187.6 million to small businesses during the evaluation period. The most recent market share data (2022) for small business lending reflects that Fidelity ranked fifth among 97 lenders in the market with 6.2 percent of the total dollar volume in the AA, and 14th based on the number of loans made with 1.2 percent of the market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. Given the limited number of owner-occupied homes in low-income geographies, examiners placed more weight on performance in moderate-income geographies when drawing conclusions for both analysis periods. Examiners also placed more weight on performance compared to the aggregate in low-income geographies due to the limited number of owner-occupied homes in those geographies.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

During the 2020-2021 analysis period, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, Fidelity's lending distribution was consistent with the 2020-2021 lending distribution.

Small Loans to Businesses

Refer to Table Q in the state of Kansas 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

During the 2020-2021 analysis period, the bank's percentage of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate distribution of loans in both low- and moderate-income geographies by all lenders.

During the 2022-2023 analysis period, Fidelity's lending performance was consistent with the 2020-2021 lending distribution.

Lending Gap Analysis

Examiners analyzed Fidelity's lending patterns during the evaluation period throughout the AA to identify gaps in the geographic distribution of loans. Examiners did not identify any unexplained or conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

During the 2020-2021 analysis period, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

During the 2022-2023 analysis period, Fidelity's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and was near to the aggregate distribution of home mortgage loans to low-income families by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor.

During the 2020-2021 analysis period, the bank did not collect or consider the gross annual revenue (GAR) in the underwriting of approximately 7 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was well below the percentage of businesses in the AA with GAR of \$1 million or less and was below the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

During the 2022-2023 analysis period, Fidelity's lending performance was consistent with the 2020-2021 lending distribution.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made a total of 50 CD loans, 11 of which were Small Business Administration (SBA) Paycheck Protection Program (PPP) loans, demonstrating responsiveness to the COVID-19 pandemic. The total amount of CD loans was \$49.3 million, representing 19 percent of the bank's allocated tier one capital.

Noteworthy examples of CD lending include:

- Financed a non-profit organization's purchase of a vacant commercial building for the construction of new multi-family housing for low-income individuals. The non-profit provides outreach, shelter, affordable housing, and other supportive services to those experiencing homelessness.
- Financed the renovation of a housing shelter. This non-profit organization serves survivors of human trafficking and provides services such as financial counseling and workforce training.
- Financed a line of credit that was used to revitalize, maintain, and build affordable housing for low- and moderate-income individuals or families.

Product Innovation and Flexibility

The institution uses innovative or flexible lending practices to serve AA credit needs.

Fidelity offers flexible home mortgage programs designed to facilitate home ownership for low- and moderate-income borrowers. These programs include the Federal Housing Administration (FHA), the Veteran's Administration (VA), and the U.S. Department of Agriculture/Rural Development (USDA). These programs offer borrowers an opportunity to obtain home financing on more flexible terms like lower down payment requirements, seller paid closing costs, down payment flexibility, and approval qualifications for borrowers with lower credit scores. VA and USDA loans also allow 100 percent financing. During the evaluation period, Fidelity originated 508 flexible or innovative home loans totaling \$101.9 million inside the AA, and 178 loans totaling \$37.3 million outside the AA but within the state of Kansas.

The bank partners with the SBA to originate loans that meet program requirements. During the COVID-19 pandemic, Fidelity originated SBA-PPL loans for small business relief. The bank originated 602 PPP loans through the SBA inside the Sedgwick County AA for a cumulative value of \$103.1 million.

Fidelity also partners with various down-payment assistance programs and offers a portfolio program called the Equity Builder. These programs offer borrowers an opportunity to obtain home financing when they would otherwise not qualify. Fidelity made 21 down payment assistance loans in 2022 and 20 down payment assistance loans in 2023 through the FHLB Topeka HSP program, for cumulative loan amounts of \$2.9 million and \$2.7 million, respectively.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Johnson County AA is consistent with the bank’s overall performance under the Lending Test in the full-scope area.

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

INVESTMENT TEST

The bank’s performance under the Investment Test in Kansas is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank’s performance in the Sedgwick County AA is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope*:										
Sedgwick County	2	86	99	30,438	101	91.0	30,523	95.4	0	0
Limited-Scope:										
Johnson County	0	0	10	1,455	10	9.0	1,455	4.6	0	0

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

** 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.

Fidelity made 99 qualified investments totaling \$30.4 million during the evaluation period and carried over two investments totaling \$85,570 from the prior period. The dollar volume of current- and prior-period investments represented 11.7 percent of allocated tier 1 capital.

Fidelity exhibited excellent responsiveness to credit and community economic development needs. Fidelity’s investments and donations were particularly responsive to identified CD needs for revitalization and stabilization. By dollar volume, 89.9 percent of investments supported revitalization and stabilization efforts, 5.1 percent funded community services to low- and moderate-income individuals, 3.7 percent supported economic development, and 1.2 percent supported affordable housing. Fidelity made significant use of innovative and complex investments to support CD initiatives. The bank made three low-income housing tax credit investments totaling \$335,570 between the current and prior periods, which are generally more complex and require more expertise to execute. Investment totals include institutional investments and donations, as the bank did not differentiate between the two in their submission.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Johnson County AA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Kansas is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Sedgwick County AA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Sedgwick County	97.8	11	91.7	0.0	27.3	27.3	45.5	3.8	27.7	36.2	31.6
Limited-Scope:											
Johnson County	2.2	1	8.3	0.0	0.0	0.0	100.0	1.0	6.8	35.8	56.4

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

The percentage of branches in moderate-income tracts is near to the population living in these geographies. The bank does not have any branches in low-income tracts.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Sedgwick County	0	3	0	0	-3	0
Limited-Scope:						
Johnson County	0	0	0	0	0	0

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

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income

tracts and/or to low- and moderate-income individuals. The bank closed three branches in middle-income tracts in the Sedgwick County AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography. Branches have lobby hours of Monday through Friday 9:00 a.m. to 5:00 p.m. and drive-up hours of 7:30 a.m. to 8:00 p.m. to accommodate customers that bank after work. All branches have drive-up hours from 9:00 a.m. to 5:00 p.m. on Saturday, while most branches, except for the downtown main office, have open lobby hours on Saturday from 9:00 a.m. to 12:00 p.m.

The bank operates 30 IBMs in the Sedgwick County AA, with nine located in moderate-income geographies.

Community Development Services

The institution is a leader in providing CD services.

During the evaluation period, employees provided 2,914 hours of CD service to 23 different organizations.

Examples of service hours include the following:

- Assisting low- and moderate-income individuals with the application process to obtain qualification for the Federal Home Loan Bank of Topeka's down payment assistance affordable housing program.
- Provided financial literacy education to low- and moderate-income students in kindergarten through 12th grade.
- Provided free tax preparation in conjunction with the IRS' Volunteer Income Tax Assistance program to low- and moderate-income individuals and households.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Johnson County AA is weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance is due to less accessible service delivery systems in the AA. The bank's performance in the Johnson County AA has minimal impact on the Service Test rating for the state of Kansas, as the bank's presence in Johnson County is limited to one branch.

State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.
- The institution had an excellent level of qualified CD investments and grants.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a significant level of CD services.

Description of Institution's Operations in Oklahoma

Fidelity has three AAs in the state of Oklahoma. The AAs consist of the Oklahoma County AA, which is part of the Oklahoma City, OK MSA, the Tulsa County AA which is part of the Tulsa, OK MSA, and the non-MSA Mayes County AA. Tulsa County was delineated as an AA on August 1, 2020, through the acquisition of an outside institution. Mayes County was added as an AA on October 25, 2021, through a second acquisition. The Mayes County AA was subsequently removed as an AA effective August 18, 2023, due to the sale of the two bank branches located in the AA.

As of December 31, 2023, Fidelity operated five branches, four ATMs, and seven IBMs in the state of Oklahoma. Total deposits in the state of Oklahoma, as of June 30, 2023, was \$315 million. The Oklahoma County AA has four branch locations, and the Tulsa County AA contains one location. All ATMs and IBMs are also in the Oklahoma County AA. The June 30, 2023 FDIC summary of deposits and deposit market share reports include the five remaining branches as well as the two branches that were sold.

Oklahoma County AA

Fidelity operated four branches in the Oklahoma County AA as of December 31, 2023. Total deposits, as of June 30, 2023, were \$236.2 million, placing Fidelity 28th in market share with 0.6 percent of all deposits.

The following tables provide a summary of the demographic profile of the Oklahoma County AA by categorizing the AA characteristics into their respective census tracts based on income level for each of the evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Oklahoma County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	11.6	35.3	29.0	20.7	3.3
Population by Geography	754,480	10.6	32.4	29.7	26.9	0.4
Housing Units by Geography	326,985	10.2	34.0	29.9	25.4	0.5
Owner-Occupied Units by Geography	171,014	6.1	25.8	32.5	35.4	0.1
Occupied Rental Units by Geography	120,376	14.5	43.1	27.2	14.2	0.9
Vacant Units by Geography	35,595	15.5	42.1	26.7	14.9	0.8
Businesses by Geography	112,241	6.6	25.6	29.4	34.3	4.1
Farms by Geography	2,556	6.1	23.9	28.9	39.4	1.7
Family Distribution by Income Level	181,431	24.7	17.9	19.1	38.3	0.0
Household Distribution by Income Level	291,390	26.1	17.7	17.5	38.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$135,429
			Median Gross Rent			\$794
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS and 2021 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Oklahoma County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	266	9.8	32.0	27.4	25.2	5.6
Population by Geography	796,292	9.0	31.7	29.5	28.3	1.5
Housing Units by Geography	341,512	9.1	33.5	30.0	25.7	1.8
Owner-Occupied Units by Geography	181,874	5.9	26.4	31.8	34.7	1.3
Occupied Rental Units by Geography	123,906	12.3	42.3	27.8	15.3	2.3
Vacant Units by Geography	35,732	13.7	39.3	28.1	16.3	2.6
Businesses by Geography	151,096	6.5	27.3	27.4	36.5	2.2
Farms by Geography	3,621	5.6	28.6	27.5	37.3	1.1
Family Distribution by Income Level	187,286	24.1	18.7	18.8	38.4	0.0
Household Distribution by Income Level	305,780	26.3	17.3	18.2	38.2	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$75,170	Median Housing Value			\$163,171
			Median Gross Rent			\$906
			Families Below Poverty Level			11.7%
<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>						

Economic Data

Data from Moody's Analytics May 2024 report shows Oklahoma City's top employers include Tinker Air Force Base, the University of Oklahoma-Norman, Integris Health, University of Oklahoma Health Sciences Center, and FAA Mike Monroney Aeronautical Center. Government employees make up the largest sector of employment at 18.8 percent of total employment in the area, with education and health services, and professional and business services comprising 16.1 percent and 13.4 percent of total employment, respectively. Oklahoma City benefits from persistent net migration with strong population growth, enabling energy production and hiring to exceed expectations. The area has a diverse economy that features a set of non-energy drivers with a high concentration of prime-age workers.

Utilizing data from the U.S. Bureau of Labor Statistics, the unemployment rate for Oklahoma County has trended down over the evaluation period. The June 2024 unemployment statistics show Oklahoma County had unemployment of 3.6 percent, an increase from 3.3 percent noted in June 2023, and 3.2 percent in June 2022. Unemployment rates have dropped from 5.5 percent in June 2021 and are considerably lower than the 9.3 percent unemployment rate in June 2020.

Examiners utilized existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Oklahoma County AA to address those needs. Contacts noted that the local economy has bounced back from the effects of the COVID-19 pandemic. One contact noted the need to provide funding for small businesses and start-ups, with local banks playing an active role in these burgeoning small businesses. The contacts noted that local financial institutions are receptive to community needs and do a good job in serving the credit needs of the community.

Housing

According to the ACS U.S. Census demographic data, during the evaluation period, median housing values in the Oklahoma County AA increased 20.7 percent from \$135,000 in 2021 to \$163,000 in 2023, and median gross rent increased 14.1 percent from \$794 in 2021 to \$906 in 2023 in the AA. Based upon the median family income taken from the demographic data in the provided tables above for each respective lending analysis period (2020-2021 or 2022-2023), examiners determined low-income families earned up to \$32,029 or \$37,585, and moderate-income families earned \$51,246 or \$60,136 per year. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Using this analysis, the maximum monthly payment for low-income families would be \$801 or \$940, and \$1,281 or \$1,503 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA's median housing value would be \$727 or \$876. Low-income borrowers would be challenged to afford a home mortgage loan in this AA.

Tulsa County

Fidelity operated one branch in the Tulsa County AA as of December 31, 2023. Total deposits, as of June 30, 2023, were \$52.6 million, placing Fidelity 38th in market share with 0.2 percent.

The following tables provide a summary of the demographic profile of the Tulsa County AA by categorizing the AA characteristics into their respective census tracts based on income level for each of the evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Tulsa County OK AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	175	9.7	30.9	29.1	30.3	0.0
Population by Geography	623,335	8.0	26.8	31.2	33.9	0.0
Housing Units by Geography	274,891	8.3	28.2	31.8	31.6	0.0
Owner-Occupied Units by Geography	146,793	4.5	20.5	32.9	42.1	0.0
Occupied Rental Units by Geography	99,287	12.4	36.9	31.6	19.1	0.0
Vacant Units by Geography	28,811	13.6	37.3	27.3	21.8	0.0
Businesses by Geography	90,853	4.1	21.1	33.9	40.9	0.0
Farms by Geography	2,141	4.1	19.3	36.2	40.3	0.0
Family Distribution by Income Level	156,574	22.0	16.9	19.6	41.4	0.0
Household Distribution by Income Level	246,080	24.4	16.5	17.7	41.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$141,333
			Median Gross Rent			\$783
			Families Below Poverty Level			12.3%
<i>Source: 2015 ACS and 2021 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Tulsa County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	208	6.3	31.7	25.5	36.1	0.5
Population by Geography	669,279	6.1	30.7	26.0	36.8	0.5
Housing Units by Geography	284,341	6.9	31.5	27.3	34.0	0.4
Owner-Occupied Units by Geography	151,162	3.6	23.2	27.7	45.4	0.1
Occupied Rental Units by Geography	102,747	11.0	40.6	27.0	20.6	0.8
Vacant Units by Geography	30,432	9.3	41.6	25.9	22.2	0.9
Businesses by Geography	115,870	4.1	24.3	28.6	42.8	0.1
Farms by Geography	2,901	3.7	22.1	35.0	39.0	0.2
Family Distribution by Income Level	159,053	21.5	17.3	18.9	42.4	0.0
Household Distribution by Income Level	253,909	24.0	16.5	17.4	42.1	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$72,203	Median Housing Value			\$164,872
			Median Gross Rent			\$897
			Families Below Poverty Level			10.9%
<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>						

Economic Data

Data from Moody's Analytics May 2024 report shows Tulsa's top employers include Saint Francis Health System, Hillcrest Healthcare System, American Airlines Maintenance Base, and Ascension St. John. Education and health services make up the largest sector of employment at 16.3 percent of total employment in the area, with professional and business services and government employees comprising 13.8 percent and 12.9 percent of total employment, respectively. Tulsa has experienced positive net migration with population growth outpacing the state and national average. Low energy and living costs are strengths for the area, although exposure to volatility in mining and manufacturing present obstacles to future growth.

Utilizing data from the U.S. Bureau of Labor Statistics, the unemployment rate for Tulsa County has trended down over the evaluation period. The June 2024 unemployment statistics show Tulsa County had unemployment of 3.6 percent, an increase from 3.3 percent noted in both June 2023 and June 2022. Unemployment rates have dropped from 5.2 percent in June 2021 and are considerably lower than the 9.3 percent unemployment in June 2020.

Examiners utilized existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Tulsa County AA to address those needs. Contacts noted that there is need for small business lending, with local banks playing an active role in facilitating this financing. The contacts noted that local financial institutions are receptive to community needs and do a good job in meeting those credit needs and engaging in opportunities with the community.

Housing

According to the ACS U.S. Census demographic data, during the evaluation period, median housing values in the Tulsa County AA increased 17 percent from \$141,000 in 2021 to \$165,000 in 2023, and median gross rent increased 14.6 percent from \$783 in 2021 to \$897 in 2023 in the AA. Based upon the median family income taken from the demographic data in the provided tables above for each respective lending analysis period (2020-2021 or 2022-2023), examiners determined low-income families earned up to \$30,591 or \$36,102, and moderate-income families earned \$48,946 or \$57,762 per year. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Using this analysis, the maximum monthly payment for low-income families would be \$765 or \$903, and \$1,224 or \$1,444 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the AA's median housing value would be \$759 or \$885. Low-income borrowers would be challenged to afford a home mortgage loan in this AA.

Scope of Evaluation in Oklahoma

As of June 30, 2023, Fidelity's three AAs in the state of Oklahoma represented 11.6 percent of the bank's total deposits and 15.2 percent of the loans originated within the bank's AAs during the evaluation period.

Examiners performed a full-scope review of the Oklahoma County AA and the Tulsa County AA. Performance in the Oklahoma County AA received more weight when assigning ratings as it represents 74.9 percent of deposits and 81.2 percent of originations in the state. Examiners placed more weight on home mortgage loans when drawing conclusions in the Oklahoma County AA and more weight on loans

to small business in the Tulsa County AA, as those loan products represented the majority of loan originations in each AA.

We performed a limited-scope review of the Mayes County AA. The bank did not originate a sufficient volume of loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank’s performance under the Lending Test in Oklahoma is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Oklahoma County AA is good and performance in the Tulsa County AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
Oklahoma County	507	373	0	12	892	81.2	74.9
Tulsa County	65	113	0	3	181	16.5	16.8
Limited Scope:							
Mayes County	17	7	2	0	26	2.4	8.3
Total	589	493	2	15	1,099	100.0	100.0

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State * Loans	% State Deposits
Full Scope:							
Oklahoma County	124,747	73,342	0	28,892	226,981	74.6	74.9
Tulsa County	19,360	28,100	0	26,089	73,549	24.2	16.8
Limited Scope:							
Mayes County	2,561	801	497	0	3,859	1.3	8.3
Total	146,668	102,243	497	54,981	304,389	100.0	100.0

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

Oklahoma County AA

Lending levels reflect excellent responsiveness to individuals and businesses in the Oklahoma County AA, in relation to the credit needs and the bank’s deposit market share. Fidelity’s home mortgage and

small business lending performance exceeded its deposit base relative to the level and nature of competition for both home mortgage and small business lending.

As of June 30, 2023, Fidelity ranked 28th among 58 financial institutions in the Oklahoma County AA with a deposit market share of 0.6 percent, putting Fidelity in the 51st percentile among depository institutions in the AA.

Home mortgage lending activity in the AA is excellent. Fidelity originated 507 loans totaling \$124.7 million to borrowers in the Oklahoma County AA during the evaluation period. The most recent market share data (2022) for home mortgage lending reflects that Fidelity ranked 49th out of 457 lenders in the market based on the number of loans with 0.5 percent market share.

Small business lending activity in the Oklahoma County AA is excellent. Fidelity originated 373 loans totaling \$73.3 million to small businesses during the evaluation period. The most recent market share data (2022) for lending to small businesses reflects that Fidelity ranked 34th out of 132 lenders in the highly competitive environment based on number of loans with 0.2 percent market share.

Tulsa County AA

Lending levels reflect adequate responsiveness to individuals and businesses in the Tulsa County AA, in relation to the credit needs and the bank's deposit market share. Fidelity's home mortgage and small business lending performance exceeded its deposit base relative to the level and nature of competition for both home mortgage and small business lending.

As of June 30, 2023, Fidelity ranked 38th among 49 institutions in the Tulsa County AA with a deposit market share of 0.2 percent.

Home mortgage lending activity in the AA is good. Fidelity originated 65 loans totaling \$19.4 million to borrowers in the Tulsa County AA during the evaluation period. The lending level for home mortgage loans reflects an adequate responsiveness to credit needs in the Tulsa County AA. The most recent market share data (2022) for home mortgage lending reflects that Fidelity ranked 87th out of 422 lenders in the market based on the number of loans with 0.1 percent market share.

Small business lending activity in the Tulsa County AA is adequate. Fidelity originated 113 loans totaling \$28.1 million to small businesses during the evaluation period. The most recent market share data (2022) for lending to small businesses reflects that Fidelity ranked 44th out of 109 lenders in the market based on number of loans with 0.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. Given the limited number of owner-occupied homes in low-income geographies, examiners placed more weight on performance in moderate-income geographies when drawing conclusions for both analysis periods.

Examiners also placed more weight on performance compared to the aggregate in low-income geographies due to the limited number of owner-occupied homes in those geographies.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

Oklahoma County AA

The geographic distribution of home mortgage loans is adequate.

During the 2020-2021 analysis period, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies but exceeded the aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, the bank's percentage of home mortgage loans in both low- and moderate-income geographies was below the percentage of owner-occupied homes in those respective geographic groups and was below the aggregate distribution of home mortgage loans in both low- and moderate-income geographies by all lenders.

Tulsa County AA

The geographic distribution of home mortgage loans is adequate.

During the 2020-2021 analysis period, the bank did not make any home mortgage loans in low-income tracts. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies but was near to the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies but exceeded aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans by all lenders.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

Oklahoma County AA

The geographic distribution of small loans to businesses was good.

During the 2020-2021 analysis period, the bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and was near to the aggregate distribution of loans by all lenders.

Tulsa County AA

The geographic distribution of small loans to businesses was adequate.

During the 2020-2021 analysis period, the bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate distribution of loans by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, the bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate distribution of loans by all lenders. The bank's percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and was well below the aggregate distribution of loans by all lenders.

Lending Gap Analysis

Examiners analyzed Fidelity's lending patterns during the evaluation period throughout the AA to identify gaps in the geographic distribution of loans. Examiners did not identify any unexplained or conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

Oklahoma County AA

The borrower distribution of home mortgage loans was poor.

During the 2020-2021 analysis period, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of those families and was below the aggregate distribution of loans by all lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of those families but exceeded the aggregate distribution of by all lenders.

During the 2022-2023 analysis period, the bank's percentage of home mortgage loans to low- and moderate-income borrowers was well below the percentage of low-income families and was below the aggregate distribution of home mortgage loans to low- and moderate-income families by all lenders.

Tulsa County AA

The borrower distribution of home mortgage loans was poor.

During the 2020-2021 analysis period, the bank did not make any home mortgage loans to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers was below both the percentage of those families and the aggregate distribution of loans by all lenders.

During the 2022-2023 analysis period, the bank did not make any home mortgage loans to low-income borrowers. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and exceeded the aggregate distribution of home mortgage loans to moderate-income families by all lenders.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

Oklahoma County AA

The distribution of loans to businesses of different sizes was good.

During the 2020-2021 analysis period, the bank did not collect or consider the GAR in the underwriting of approximately 16 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less but exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

During the 2022-2023 analysis period, Fidelity's lending performance was consistent with the 2020-2021 lending distribution.

Tulsa County AA

The distribution of loans to businesses of different sizes was good.

During the 2020-2021 analysis period, the bank did not collect or consider the GAR in the underwriting of approximately 27 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less and was near to the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

During the 2022-2023 analysis period, the bank did not collect or consider the GAR in the underwriting of approximately 2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to businesses with GAR of \$1 million or less was below the percentage of businesses in the AA with GAR of \$1 million or less and exceeded the aggregate distribution of small loans to businesses with GAR of \$1 million or less by all lenders.

Community Development Lending

The institution has made an excellent level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Oklahoma County AA

Fidelity was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

Fidelity made 12 CD loans in the Oklahoma County AA, totaling \$28.9 million during the evaluation period. CD loan totals represented 109.9 percent of the bank's allocated tier one capital. The bank originated four SBA PPP loans made in response to the COVID-19 pandemic. Fidelity also originated eight affordable housing CD loans totaling \$22.5 million for low- and moderate-income individuals in the AA.

Noteworthy examples of CD lending include:

- Financing to purchase and renovate a 97-unit apartment complex primarily serving low- and moderate-income individuals and families.
- Financing to purchase and renovate a 100-unit multi-family apartment complex primarily serving low- and moderate-income individuals and families.
- Four PPP loans totaling \$6.4 million to support job retention.

Tulsa County AA

Fidelity was a leader in making CD loans. CD lending activities had a positive impact on the Lending Test conclusion.

The bank originated three CD loans totaling \$26.1 million during the evaluation period. CD lending totals represented 445.5 percent of the bank's allocated tier one capital. Two loans provided affordable housing for low- and moderate-income individuals, and one loan provided support for revitalization and stabilization needs.

Noteworthy examples of CD lending include:

- Financing to purchase and renovate a 117-unit apartment complex primarily serving low- and moderate-income individuals and families by assisting in providing affordable housing.
- Funding for the renovation of a 176-unit Section 8 Housing property that primarily serves low- and moderate-income individuals and families.
- Financing for the construction of a commercial building in the Greenwood area, as part of the Tulsa Downtown Area Plan.

Product Innovation and Flexibility

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

Fidelity offers flexible home mortgage programs designed to facilitate home ownership for low- and moderate-income borrowers. These programs include the FHA, the VA, and the USDA. These programs offer borrowers an opportunity to obtain home financing on more flexible terms like lower down payment requirements, seller paid closing costs, down payment flexibility, and approval qualifications for borrowers with lower credit scores. VA and USDA loans also allow 100 percent financing. During the evaluation period, Fidelity originated 39 flexible or innovative home loans totaling \$7.5 million inside the Oklahoma County AA, three flexible home loans totaling \$652,000 inside the Tulsa County AA, and 59 loans totaling \$12.4 million outside the AAs but within the state of Oklahoma.

The bank partners with the SBA to originate loans that meet their program requirements. During the COVID-19 pandemic, Fidelity originated SBA-PPP loans for small business relief. Fidelity originated 201 SBA-PPP loans inside the Oklahoma County AA totaling \$26.4 million, and 23 PPP loans in the Tulsa County AA totaling \$2.2 million.

Fidelity also partners with various down-payment assistance programs and offers a portfolio program called the Equity Builder. These programs offer borrowers an opportunity to obtain home financing when they would otherwise not qualify. Fidelity made four down payment assistance loans in 2022 and one down payment assistance loan through the Oklahoma Housing Finance Agency, for cumulative loan amounts of \$631,000, and \$186,000, respectively.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Mayes County AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

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

INVESTMENT TEST

The bank’s performance under the Investment Test in Oklahoma is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Oklahoma County AA is excellent and performance in the Tulsa County AA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Oklahoma County AA	1	38	17	2,724	18	75.0	2,762	88.2	0	0
Tulsa County AA	0	0	4	367	4	16.7	367	11.7	0	0
Limited-Scope:										
Mayes County AA	0	0	2	1	2	8.3	1	0.0	0	0

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

* 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.

Oklahoma County AA

Fidelity’s performance in the Oklahoma County AA is excellent. During the evaluation period investments totaled \$2.7 million and represented 10.5 percent of the AA’s allocated tier 1 capital. There was one investment for \$38,336 from the prior period.

The bank purchased four new investments totaling \$2.7 million in the AA during the evaluation period. These investments supported affordable housing for low- and moderate-income individuals. Fidelity extended 13 grants to eight organizations in the AA, totaling over \$48,000 during the evaluation period. These grants were used to support low- and moderate-income individuals and families through disaster and homeless services, child abuse prevention, special needs care, affordable housing, financial education, and other essential support services.

Tulsa County AA

Fidelity’s performance in the Tulsa County AA is excellent. During the evaluation period, investments totaled \$367,010 and represented 6.3 percent of the AA’s allocated tier 1 capital.

Fidelity purchased one large affordable housing investment totaling \$361,010 in the AA during the evaluation period. The investment supported affordable housing for low- and moderate-income individuals. Fidelity also extended three qualifying grants to two organizations in the AA, totaling \$6,000. One grant supported home repair for elderly and disabled low-income individuals, and the other donations helped to fund special needs care and essential support services for low- and moderate-income individuals. The bank did not provide any prior period investments.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Mayes County AA is weaker than the bank’s overall performance under the Investment Test in the full-scope areas due to a limited-volume of qualified investments. Performance in the limited-scope AA did not negatively impact the overall state rating for the Investment Test.

SERVICE TEST

The bank’s performance under the Service Test in Oklahoma is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Oklahoma County AA is good and performance in the Tulsa County AA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
	Full-Scope:										
Oklahoma County AA	75.0	4	57.1	0.0	25.0	25.0	50.0	9.0	31.7	29.5	28.3
Tulsa County AA	16.7	1	14.3	0.0	0.0	0.0	100.0	6.1	30.7	26.0	36.8
Limited-Scope:											
Mayes County AA	8.3	2	28.6	0.0	50.0	50.0	0.0	0.0	11.5	70.4	18.1

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

Oklahoma County AA

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA. As of December 31, 2023, Fidelity operated four branches within the Oklahoma County AA. Fidelity did not operate any branches in low-income geographies. The distribution of branches in moderate-income geographies was near to the percentage of the population living in those geographies.

Tulsa County AA

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

As of December 31, 2023, Fidelity operated one branch in the Tulsa County AA. The lone branch is in an upper-income tract.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Oklahoma County AA	0	2	-1	0	0	-1
Tulsa County AA	2	1	0	0	0	+1
Limited-Scope:						
Mayes County AA	2	2	0	0	0	0

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

Oklahoma County AA

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income tracts and/or to low- and moderate-income individuals. Fidelity made the following changes within the Oklahoma County AA during the evaluation period:

- Fidelity closed two branches in the AA; one in a low-income geography and one in an upper-income geography. Prior to the 2022 census, the branch locations were in middle- and upper-income geographies, respectively, and the bank decided to close the branches prior to the change in income designation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Fidelity provides service through all branch locations with lobby hours of Monday through Friday 9:00 a.m. to 5:00 p.m. All AA branches have drive-up hours of 7:30 a.m. to 8:00 p.m. to accommodate customers that bank after work. Additionally, all four branches in the AA offer drive-up hours from 9:00 a.m. to 5:00 p.m. on Saturday, while three branches offer lobby hours on Saturday from 9:00 a.m. to 12:00 p.m. Fidelity offers seven IBMs within the Oklahoma County AA, with one IBM located within a moderate-income tract.

Tulsa County AA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income tracts and/or to low- and moderate-income individuals. Fidelity made the following changes within the Tulsa County AA during the evaluation period:

- Fidelity opened a branch in Tulsa County located in a middle-income tract on August 1, 2020.
- Through acquisition, the bank expanded its Tulsa footprint by acquiring a branch in an upper-income tract, on October 25, 2021.
- The bank closed the middle-income branch in July 2022, due to limited customer use.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Fidelity provides service through the branch location with lobby hours of Monday through Friday 9:00 a.m. to 5:00 p.m.

Community Development Services

Oklahoma County AA

The institution is a leader in providing CD services within the Oklahoma County AA.

During the evaluation period, employees provided CD services to seven organizations totaling 1,079 service hours. Examples of CD services in the Oklahoma County AA include:

- Provided no cost loan servicing functions to low- and moderate-income borrowers who qualify for the Habitat for Humanity of Central Oklahoma's affordable housing product.
- Serving on the board of a non-profit organization dedicated to supporting low- and moderate-income families.

Tulsa County AA

The institution provides an adequate level of CD services within the Tulsa County AA.

During the evaluation period, employees provided CD services to five organizations totaling 89 hours. Examples of CD services in the Tulsa County AA include:

- Assisting in fundraising for an organization that provides funds for housing repairs for low- and moderate-income individuals and families.
- Provided financial literacy education to a school with 100 percent of the student population qualifying for the Free and Reduced Lunch Program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Mayes County AA is stronger than the bank's overall performance under the Service Test in the full-scope AAs. Performance is stronger due to the excellent branch distribution, allowing for more accessible delivery systems in the Mayes County AA.

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:	January 1, 2020 to December 31, 2023	
Bank Products Reviewed:	Home mortgage and small business lending CD loans, qualified investments, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Kansas		
Sedgwick County AA	Full-Scope	Sedgwick County
Johnson County AA	Limited-Scope	Johnson County
State of Oklahoma		
Oklahoma County AA	Full-Scope	Oklahoma County
Tulsa County AA	Full-Scope	Tulsa County
Mayes County AA	Limited-Scope	Mayes County

Appendix B: Summary of MMSA and State Ratings

RATINGS: FIDELITY BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Fidelity Bank, N.A.	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
Kansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oklahoma	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

Low-Income (Low): An individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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.

State of Kansas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-2021
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	
Johnson County KS AA	959	279,681,189	30.1	41,169	0.3	0.1	0.2	4.5	4.9	3.8	31.3	21.8	28.1	63.9	73.2	67.9	0.0	0.0	0.0	
Sedgwick County KS AA	2,231	475,895,339	69.9	23,898	5.8	2.7	3.1	19.6	10.5	14.5	29.0	25.2	28.2	45.6	61.5	54.2	0.0	0.0	0.0	
Total	3,190	755,576,528	100.0	65,067	3.1	1.4	1.7	12.1	7.7	9.2	30.2	23.5	28.2	54.8	67.4	61.1	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000025188) excluded from Aggregate

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	
Johnson County KS AA	307	100,444,546	18.1	20,291	0.3	0.0	0.2	4.7	3.3	4.8	34.2	28.0	33.8	60.7	68.7	61.2	0.0	0.0	0.0	
Sedgwick County KS AA	1,388	292,512,298	81.9	15,596	2.1	1.3	1.5	21.6	17.6	20.9	40.2	34.7	39.3	36.0	46.5	38.1	0.2	0.0	0.2	
Total	1,695	392,956,844	100.0	35,887	1.2	0.7	0.9	13.2	10.5	12.9	37.2	31.4	36.6	48.4	57.6	49.7	0.1	0.0	0.1	

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%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021	
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	
Johnson County KS AA	959	279,681,189	30.1	41,169	12.0	2.3	3.8	13.6	12.1	13.2	19.0	23.1	20.0	55.3	60.7	47.1	0.0	1.8	16.0	
Sedgwick County KS AA	2,231	475,895,339	69.9	23,898	21.7	7.1	6.9	17.7	19.6	16.8	20.9	24.2	19.5	39.8	43.2	29.9	0.0	5.9	26.8	
Total	3,190	755,576,528	100.0	65,067	16.9	4.7	5.4	15.7	15.9	15.0	20.0	23.7	19.8	47.6	52.0	38.5	0.0	3.9	21.4	

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000025188) excluded from Aggregate

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	
Johnson County KS AA	307	100,444,546	18.1	20,291	11.5	2.0	4.2	13.2	8.5	13.9	20.4	15.3	20.9	54.9	57.7	48.0	0.0	16.6	13.0	
Sedgwick County KS AA	1,388	292,512,298	81.9	15,596	20.3	8.9	9.7	18.6	20.2	21.0	21.0	23.3	19.4	40.1	39.3	26.6	0.0	8.3	23.2	
Total	1,695	392,956,844	100.0	35,887	15.9	5.5	7.0	15.9	14.4	17.5	20.7	19.3	20.2	47.5	48.5	37.3	0.0	12.5	18.1	

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%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
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	
Johnson County KS AA	44	7,150	4.6	18,440	1.1	0.0	1.0	6.8	6.8	7.7	26.4	15.9	25.1	62.8	68.2	63.0	2.9	9.1	3.2	
Sedgwick County KS AA	916	125,653	95.4	9,671	5.9	8.0	5.9	26.9	31.1	26.7	26.2	23.9	25.2	41.0	37.0	41.9	0.0	0.0	0.4	
Total	960	132,803	100.0	28,111	3.5	4.0	3.5	16.9	19.0	17.2	26.3	19.9	25.2	51.9	52.6	52.5	1.5	4.6	1.8	

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000025188) excluded from Aggregate

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	
Johnson County KS AA	6	2,760	2.0	17,128	0.7	0.0	0.7	5.0	0.0	4.6	28.8	50.0	27.7	62.2	50.0	63.2	3.2	0.0	3.8	
Sedgwick County KS AA	289	61,964	98.0	9,473	2.6	4.8	2.5	22.2	24.9	22.0	31.8	25.6	32.5	40.2	40.8	39.8	3.2	3.8	3.2	
Total	295	64,724	100.0	26,601	1.7	2.4	1.6	13.6	12.5	13.3	30.3	37.8	30.1	51.2	45.4	51.5	3.2	1.9	3.5	

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021	
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	
Johnson County KS AA	44	7,150	4.6	18,440	85.7	52.3	47.9	5.1	40.9	9.2	6.8	
Sedgwick County KS AA	916	125,653	95.4	9,671	83.3	45.2	51.3	5.8	47.4	11.0	7.4	
Total	960	132,803	100.0	28,111	84.5	48.8	49.6	5.5	44.2	10.1	7.1	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>FIDELITY BANK (10000025188) excluded from Aggregate</i>												

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	
Johnson County KS AA	6	2,760	2.0	17,128	87.9	33.3	50.6	4.1	66.7	8.0	0.0	
Sedgwick County KS AA	289	61,964	98.0	9,473	85.7	30.5	50.5	4.7	68.9	9.7	0.7	
Total	295	64,724	100.0	26,601	86.8	31.9	50.6	4.4	67.8	8.9	0.4	
<i>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%</i>												

State of Oklahoma

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 OK AA	308	74,781,453	92.5	35,614	6.1	3.6	3.4	25.8	16.6	17.9	32.5	22.1	29.4	35.4	57.8	49.1	0.1	0.0	0.2
Tulsa County OK AA	25	7,940,128	7.5	28,586	4.5	0.0	1.3	20.5	12.0	12.7	32.9	32.0	33.7	42.1	56.0	52.3	0.0	0.0	0.0
Total	333	82,721,581	100.0	64,200	5.3	1.8	2.4	23.2	14.3	15.3	32.7	27.1	31.6	38.8	56.9	50.7	0.1	0.0	0.1

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

FIDELITY BANK (10000025188) excluded from Aggregate

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
Mayes County OK Non MSA AA	17	2,560,830	6.6	986	0.0	0.0	0.0	7.7	17.6	10.3	71.2	58.8	68.9	21.1	23.5	20.8	0.0	0.0	0.0
Oklahoma County OK AA	199	49,966,010	77.7	23,386	5.9	2.0	4.5	26.4	11.1	22.8	31.8	29.6	31.2	34.7	57.3	40.6	1.3	0.0	1.0
Tulsa County OK AA	40	11,420,540	15.6	18,895	3.6	2.5	1.9	23.2	17.5	18.6	27.7	20.0	28.0	45.4	60.0	51.5	0.1	0.0	0.0
Total	256	63,947,380	100.0	43,267	3.2	1.5	2.1	19.1	15.4	17.2	43.6	36.1	42.7	33.7	46.9	37.6	0.5	0.0	0.3

*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%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021		
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 OK AA	308	74,781,452	92.5	35,614	24.7	2.6	5.1	17.9	14.3	13.6	19.1	15.3	15.8	38.3	57.8	33.6	0.0	10.1	32.0		
Tulsa County OK AA	25	7,940,128	7.5	28,586	22.0	0.0	5.6	16.9	8.0	15.6	19.6	8.0	17.5	41.4	60.0	34.9	0.0	24.0	26.5		
Total	333	82,721,580	100.0	64,200	23.4	1.3	5.4	17.4	11.2	14.6	19.4	11.7	16.7	39.9	58.9	34.3	0.0	17.1	29.3		

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000025188) excluded from Aggregate

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		
Mayes County OK Non MSA AA	17	2,560,830	6.6	986	23.4	11.8	4.3	15.5	17.6	14.5	19.6	5.9	21.0	41.4	47.1	38.7	0.0	17.6	21.5		
Oklahoma County OK AA	199	49,966,010	77.7	23,386	24.1	1.5	7.4	18.7	6.5	16.0	18.8	16.6	16.7	38.4	49.7	30.3	0.0	25.6	29.8		
Tulsa County OK AA	40	11,420,540	15.6	18,895	21.5	0.0	6.8	17.3	17.5	17.0	18.9	5.0	18.5	42.4	42.5	34.1	0.0	35.0	23.6		
Total	256	63,947,380	100.0	43,267	23.0	4.4	6.2	17.2	13.9	15.8	19.1	9.2	18.7	40.7	46.4	34.4	0.0	26.1	25.0		

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%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
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 OK AA	272	49,455	81.9	21,934	6.6	6.3	6.6	25.6	26.5	24.2	29.4	30.1	29.0	34.3	36.8	36.2	4.1	0.4	3.9	
Tulsa County OK AA	60	13,957	18.1	16,005	4.1	6.7	3.7	21.1	18.3	21.3	33.9	41.7	33.9	40.9	33.3	40.4	0.0	0.0	0.7	
Total	332	63,412	100.0	37,939	5.4	6.5	5.2	23.4	22.4	22.8	31.7	35.9	31.5	37.6	35.1	38.3	2.1	0.2	2.3	

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000025188) excluded from Aggregate

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	
Mayes County OK Non MSA AA	7	801	4.3	534	0.0	0.0	0.0	17.8	42.9	13.9	65.6	42.9	68.4	16.6	14.3	17.8	0.0	0.0	0.0	
Oklahoma County OK AA	101	23,887	62.7	20,262	6.5	4.0	5.8	27.3	24.8	26.3	27.4	36.6	26.7	36.5	31.7	39.2	2.2	3.0	1.9	
Tulsa County OK AA	53	14,143	32.9	15,690	4.1	7.5	4.0	24.3	5.7	23.5	28.6	37.7	27.8	42.8	49.1	44.5	0.1	0.0	0.1	
Total	161	38,831	100.0	36,486	3.5	3.8	3.3	23.1	24.5	21.2	40.5	39.1	41.0	32.0	31.7	33.8	0.8	1.0	0.7	

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%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021	
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 OK AA	272	49,455	81.9	21,934	89.5	50.0	40.0	3.3	34.2	7.2	15.8	
Tulsa County OK AA	60	13,957	18.1	16,005	88.9	40.0	41.3	3.9	33.3	7.2	26.7	
Total	332	63,412	100.0	37,939	89.2	45.0	40.7	3.6	33.8	7.2	21.3	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>FIDELITY BANK (10000025188) excluded from Aggregate</i>												

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	
Mayes County OK Non MSA AA	7	801	4.3	534	88.3	0.0	60.5	2.7	71.4	9.0	28.6	
Oklahoma County OK AA	101	23,887	62.7	20,262	91.8	52.5	51.1	2.5	44.6	5.7	3.0	
Tulsa County OK AA	53	14,143	32.9	15,690	91.1	56.6	51.1	2.9	41.5	6.0	1.9	
Total	161	38,831	100.0	36,486	90.4	36.4	54.2	2.7	52.5	6.9	11.2	
<i>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%</i>												