



PUBLIC DISCLOSURE

November 17, 2025

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Vast Bank, National Association
Charter Number: 17174

110 N. Elgin Avenue
Tulsa, OK 74120

Office of the Comptroller of the Currency

8282 South Memorial Drive
Suite 300
Tulsa, OK 74133

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

Table of Contents

Overall CRA Rating 1

Description of Institution 2

Scope of the Evaluation 2

Discriminatory or Other Illegal Credit Practices Review 3

State Rating 4

 State of Oklahoma 4

Appendix A: Scope of Examination A-1

Appendix B: Summary of MMSA and State Ratings B-1

Appendix C: Definitions and Common Abbreviations C-1

Appendix D: Tables of Performance Data D-1

Overall CRA Rating

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

The lending test is rated: Outstanding.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, market focus, competition, and lending opportunities in the assessment area (AA).
- The lending test rating is based on outstanding performance in the Oklahoma rating area.
- The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The community development (CD) test rating is based on an excellent level of CD loans, investments, and services.
- The bank did not receive any complaints related to the CRA during the evaluation period.

Loan-to-Deposit Ratio

Considering Vast Bank, National Association’s (Vast Bank or bank) size, financial condition, and credit needs of the AA, their LTD ratio is reasonable.

Vast Bank’s quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 76.19 percent. The bank’s LTD ratio had an average high ratio of 82.58 percent in the third quarter of 2022. We compared the bank’s LTD ratio to five similarly situated banks (peer group banks) in their market area. The average LTD ratio for the peer group banks was 78.61 percent, with a low average of 58.60 percent and a high average of 93.72 percent.

Lending in Assessment Area

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

The bank originated and purchased 82.71 percent of its total loans inside its AA 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	84	81.55	19	18.45	103	46,673	68.30	21,665	31.70	68,338
Small Business	26	86.67	4	13.33	30	4,677	62.97	2,750	37.03	7,427
Total	110	82.71	23	17.29	133	51,350	67.78	24,415	32.22	75,765

*Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

Vast Bank is a single-state financial institution headquartered in Tulsa, Oklahoma with total assets of \$576.8 million as of December 31, 2024. The bank is a subsidiary of Vast Holdings, Inc., a single-bank holding company headquartered at the main bank address.

The bank has one rating area located in the state of Oklahoma, with one AA comprising the entirety of Tulsa, Rogers, Wagoner, Creek, and Osage Counties. The bank operates four full-service banking centers within the state of Oklahoma. All four locations are within the bank's AA, and all are in Tulsa County. Vast Bank's main location is in downtown Tulsa, Oklahoma. All branch locations offer drive-in banking. The bank offers reasonable branch lobby hours Monday through Friday at all locations, with three locations offering extended hours on Friday or Saturdays. In addition, the bank has three automated teller machines located in Tulsa County. During the evaluation period, there were no new branch openings. The Bixby, Oklahoma branch, which is located in Tulsa County, was sold to another financial institution in 2022.

As of December 31, 2024, tier 1 capital totaled \$63 million, and loans totaled \$392 million or 67.96 percent of total assets. The bank's loan portfolio by dollar volume consists of 59.68 percent in commercial loans, 23.26 percent in one- to four-family loans, 8.93 percent in construction and land development loans, 4.85 percent in multifamily loans, 3.07 percent in consumer loans, and less than one percent in other loans. The bank's primary focus remains centered in commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. Vast Bank is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "Outstanding" at the last CRA evaluation dated August 22, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the CRA Performance of Vast Bank using Intermediate Small Bank performance criteria, which includes the lending test and CD test. Our evaluation period covered the period from January 1, 2022, to December 31, 2024. In evaluating the bank's lending performance, examiners reviewed the bank's primary loan products, home mortgage loans, and commercial loans.

To evaluate the bank's home mortgage lending, examiners used Home Mortgage Disclosure Act data collected between January 1, 2022, and December 31, 2024. For small business lending, examiners selected a sample of loans originated or purchased between January 1, 2022, and December 31, 2024.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one AA 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), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how

full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Vast Bank only operates in the state of Oklahoma and has only one AA.

The state ratings in rating areas with a single AA are based on performance in that AA. Refer to the "Scope" section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Oklahoma

CRA rating for the state of Oklahoma: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the AA.
- The distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.
- CD lending reflects excellent responsiveness to the needs of the bank's AA.
- CD investments and services reflect excellent responsiveness to the needs of the bank's AA.

Description of Institution's Operations in Oklahoma

The bank has delineated one AA in the state of Oklahoma, the Partial Tulsa MSA. The bank's AA consists of five counties within the Tulsa MSA which includes Creek County, Osage County, Rogers County, Tulsa County, and Wagoner County. The AA includes 297 census tracts (CTs) including 14 low-income CTs, 87 moderate-income CTs, 98 middle-income CTs, 97 upper-income CTs, and one unclassified CT. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. The main bank in downtown Tulsa, Oklahoma and three other branch locations are all in Tulsa County.

Based on the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank ranked 17th out of 58 FDIC-insured depository institutions with 1.5 percent deposit market share within its AA. The top three institutions by deposit market share are BOKF, National Association with 30.94 percent deposit market share, Arvest Bank with 7.51 percent deposit market share, and Bank of America, National Association with 4.97 percent deposit market share.

The economy in the bank's AA remains stable and is anchored by aerospace manufacturing, healthcare, and oil and gas. Saint Francis Health System and Hillcrest Healthcare System are the two largest employers with approximately 17,500 employees. American Airlines is the third largest employer with approximately 5,000 employees. Other major employers include Ascension St. John, Amazon, QuikTrip Corp., and AAON Inc.

Examiners evaluated the disparity between the median income of families within the AA and the cost of housing. The 2024 Federal Financial Institutions Examination Council (FFIEC) estimated median family income for the Tulsa MSA was \$85,300. Based on this information, low-income families earned less than \$42,650, and moderate-income families earned less than \$68,240. One method to determine housing affordability is to assume a maximum afford monthly principal and interest payment of no more than 30 percent of the borrower's income. The calculated maximum affordable monthly mortgage payment would be \$1,066 for a low-income borrower and \$1,706 for a moderate-income borrower. According to economic data from the Federal Reserve Bank of St. Louis, the median list price for a single-family residential property in the Tulsa MSA was \$324,380 as of December 2024. Assuming a

30-year mortgage with a 6.25 percent interest rate, and not considering homeowner’s insurance, real estate taxes, or other monthly expenses, the monthly mortgage payment for a home priced at the AA’s median list price (less a 20 percent or \$64,990 down payment) would be \$1,601 per month. LMI borrowers would be challenged to afford a mortgage loan in the Tulsa MSA.

As part of the evaluation, the OCC used two community contacts previously completed to gain a better understanding of the general community needs, as well as economic conditions. These community contacts included organizations that support affordable housing and small businesses. These contacts noted the need for affordable housing, down payment assistance programs, financial literacy training, and small business lending.

Assessment Area - Partial Tulsa MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	297	4.71	29.29	33.00	32.66	0.34
Population by Geography	963,072	4.44	28.36	33.12	33.75	0.33
Housing Units by Geography	408,177	5.07	29.81	34.00	30.83	0.29
Owner-Occupied Housing by Geography	235,873	2.62	21.97	36.07	39.30	0.04
Occupied Rental Units by Geography	127,592	9.05	40.56	30.69	19.08	0.62
Vacant Units by Geography	44,712	6.68	40.54	32.49	19.65	0.64
Businesses by Geography	43,274	3.66	25.95	33.12	37.12	0.15
Farms by Geography	1,644	2.68	22.93	39.78	34.55	0.06
Family Distribution by Income Level	237,738	20.96	17.56	19.61	41.86	0.00
Household Distribution by Income Level	363,465	23.43	16.21	17.69	42.67	0.00
Unemployment rate (%)	5.24	10.62	7.17	4.97	3.42	4.10
Households Below Poverty Level (%)	12.82	37.57	19.39	10.43	5.49	52.44
Median Family Income (46140 - Tulsa, OK MSA)		\$72,203			Median Housing Value	\$150,400
Median Family Income (46140 - Tulsa, OK MSA) for 2024		\$85,300			Median Gross Rent	\$883
					Families Below Poverty Level	10.20
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Oklahoma

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the partial Tulsa MSA was excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The bank had no home mortgages in low-income CTs. The percentage of home mortgages in moderate-income geographies was somewhat lower than the percentage of owner-occupied housing units and the aggregate level of lending in those CTs. The somewhat lower percentage home mortgages in LMI CTs relative to the percentage of housing units in LMI CTs is a result of the general difficulty for LMI individuals to afford reasonable housing at current prices and meet Vast Bank's reasonable credit standards.

Small Loans to Businesses

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

The percentage of small loans to businesses in low-income CTs exceeded the percentage of businesses and exceeded the aggregate level in those CTs. The percentage of small loans to businesses in moderate-income CTs exceeded the percentage of businesses and exceeded the aggregate level in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the partial Tulsa MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The percentage of bank mortgage loans to low-income borrowers was below the percentage of low-income families and the percentage of lending to low-income borrowers. The percentage of bank mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate percentage of lending to moderate-income borrowers. The lower percentage home mortgages to LMI borrowers relative to the percentage of LMI families is a result of the general difficulty for LMI individuals to afford reasonable housing at current prices and meet Vast Bank's reasonable credit standards.

Small Loans to Businesses

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

The percentage of bank loans to businesses with revenues of \$1 million or less was near the percentage of businesses with revenues of \$1 million or less and exceeded the aggregate percentage of lending to businesses of that size.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the CD Test in the state of Oklahoma is rated Outstanding.

Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state of Oklahoma through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

Number and Amount of Community Development Loans

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

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-scope:				
Partial Tulsa MSA	34	100	46,374	100.00

The bank made an excellent level of CD loans in the AA. During the evaluation period, the bank originated 34 CD loans totaling \$46.4 million. The bank’s lending activities effectively helped meet community credit needs by supporting community services to LMI individuals, affordable housing, and economic development as well as revitalization and stabilization as part of various city plans. The volume of CD lending in the AA was equivalent to 73.6 percent of the bank’s tier 1 capital.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$5 million loan to a non-profit organization in a moderate-income CT that oversees trade schools that offer accessible education and workforce development in LMI communities.
- A \$2.5 million loan to acquire and renovate a commercial real estate property in an IRS-designated Opportunity Zone. In addition to the economic development, revitalization, and stabilization of an economically distressed area this property promotes, one of the tenants is a charitable organization committed to expanding equal opportunities for young children through strategic investments in childhood education, community health, social services, and civic enhancement.
- A \$345,000 commercial real estate loan to a heating and air conditioning installation and repair business in a low-income CT and IRS-designated Opportunity Zone. This loan helped create and/or retain jobs in an LMI CT that delivers essential services to an LMI community.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Partial Tulsa MSA	2	4,087	1	6,352	3	75.00	10,439	91.29	--	--
Broader Statewide or Regional Area	1	996	--	--	1	25.00	996	8.71	--	--
Total	3	5,083	1	6,352	4	100.00	11,435	100.00	--	--

The qualified investments table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The volume of CD investments made during the evaluation period in the AA reflect excellent responsiveness. The bank's total qualified investments totaled \$11.4 million, or 18.1 percent of tier 1 capital. There were no unfunded commitments during the evaluation period.

Vast Bank also donated \$73,400 to 16 qualified organizations within the Partial Tulsa MSA AA during the evaluation period. Donations were made to local nonprofit organizations that provide economic development as well as community services including social services, medical care, education, and housing needs for both the homeless and LMI individuals and families.

Extent to Which the Bank Provides Community Development Services

The extent of qualified CD services within the AA reflects excellent responsiveness. Bank officers and employees provided a total of 972 hours of service with a majority providing community services that benefit LMI individuals. Officers and employees held leadership positions through board memberships in numerous civic organizations. Those organizations and nonprofits provided services to address homelessness, free food distribution to LMI communities, and social service programs intended for LMI individuals at or below established poverty levels. Some officers and employees also provided financial expertise while others provided direct services to LMI individuals and families through volunteer work.

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage Small business loans CD loans Qualified CD investments and donations CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Partial Tulsa MSA	Full-scope	Creek, Osage, Rogers, Tulsa, and Wagoner Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Vast Bank, National Association	Outstanding	Outstanding	Outstanding
State:			
Oklahoma	Outstanding	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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 low- and moderate-income 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): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares 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 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 AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares 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 to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. 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 AA.

- Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) 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 13. 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 14. 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/AA.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Partial Tulsa MSA	84	46,673	100.00	74,796	2.62	--	1.55	21.97	13.10	19.31	36.07	26.19	33.91	39.30	60.71	45.17	0.04	--	0.04		
Total	84	46,673	100.00	74,796	2.62	--	1.55	21.97	13.10	19.31	36.07	26.19	33.91	39.30	60.71	45.17	0.04	--	0.04		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Partial Tulsa MSA	84	46,773	100.00	74,796	20.96	1.19	5.99	17.56	3.57	16.58	19.61	5.95	19.82	41.86	50.00	33.50	--	39.29	24.12		
Total	84	46,773	100.00	74,796	20.96	1.19	5.99	17.56	3.57	16.58	19.61	5.95	19.82	41.86	50.00	33.50	--	39.29	24.12		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Partial Tulsa MSA	26	4,677	100.0	41,407	3.66	7.69	3.14	25.95	46.15	22.32	33.12	30.77	32.89	37.12	15.38	41.56	0.15	--	0.09
Total	26	4,677	100.0	41,407	3.66	7.69	3.14	25.95	46.15	22.32	33.12	30.77	32.89	27.12	15.38	41.56	0.15	--	0.09

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Partial Tulsa MSA	26	4,677	100.00	41,407	86.63	80.77	54.27	4.14	7.69	9.23	11.54
Total	26	4,677	100.00	41,407	86.63	80.77	54.27	4.14	7.69	9.23	11.54

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