



PUBLIC DISCLOSURE

October 21, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Oklahoma
Charter Number 11397
10900 Hefner Pointe Drive
Oklahoma City, OK 73120

Office of the Comptroller of the Currency
Oklahoma City Office
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Outstanding.

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

- The loan-to-deposit (LTD) ratio is more than reasonable considering First National Bank of Oklahoma's (FNBOK) size, financial condition, and credit needs of the AAs.
- A majority of FNBOK's loans are originated or purchased inside the bank's AAs during the evaluation period (January 1, 2021, through December 31, 2023).
- FNBOK's distribution of home mortgage, consumer, and small business loans reflects a reasonable distribution of loan originations among borrowers of different income levels and businesses with different levels of gross annual revenues.
- The geographic distribution of home mortgage, consumer, and small business loans reflects a reasonable distribution of loans through FNBOK's AAs.
- FNBOK's performance under the CD test demonstrates excellent responsiveness to the CD needs of its AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. The bank's average LTD ratio over the evaluation period was 84.5 percent, compared to a 75.5 percent aggregate average by five similarly located banks over the same period.

Institution	Total Assets (as of December 31, 2023)	Average LTD Ratio
FNBOK	\$773 Million	84.5%
FNB Community Bank	\$508 Million	52.8%
Frontier State Bank	\$530 Million	86.5%
NBC Oklahoma	\$899 Million	72.6%
Quail Creek Bank	\$783 Million	71.1%
Valliance Bank	\$622 Million	94.6%

Source: Consolidated Reports of Condition and Income

Lending in Assessment Area

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

The bank originated and purchased 77 percent of its total loans inside the bank's AAs during the evaluation period. A majority of loans originated for all loan categories reviewed were within the bank's AA based upon both the number of loans and by dollar amount of loans originated. This conclusion is based upon all loans originated within the evaluation period for the specific loan categories identified in the table below. 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.

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	795	76.3%	247	23.7%	1042	\$174,307	73.87%	\$61,644	26.13%	\$235,951
Small Business	234	75.0%	78	25.0%	312	\$41,583	84.8%	\$7,427	15.2%	\$49,010
Consumer	391	79.8%	99	20.2%	490	\$8,383	77.3%	\$2,459	22.7%	\$10,842
Total	1,420	77%	424	23%	1,844	\$224,273	75.8%	\$71,530	24.2%	\$295,803

Source: 1/1/2021-12/31/2023 HMDA Data and 2021-2023 Loan Trial Balance

Description of Institution

FNBOK is a \$773 million national bank headquartered in Oklahoma City, Oklahoma, and a subsidiary of First Bancorp of Oklahoma, Inc., a single bank holding company. FNBOK owns 100 percent of Tonkawa Business Incubator, LLC, (“TBI”), Tonkawa, Oklahoma, a certified Small Business Incubator by the Oklahoma Department of Commerce. TBI embraces business support services tailored to new and emerging companies in the Tonkawa area with the intent to create sustainable businesses, which contribute to local and regional economic growth. The Oklahoma Small Business Incubators Incentive Act enables the tenants of certified business incubators to be exempt from state tax liability on income earned as a result of occupancy.

FNBOK’s AAs comprises all of Oklahoma County (Oklahoma Partial MSA) and Kay County (Oklahoma Non-MSA). Within Oklahoma County FNBOK serves its AA with a main banking facility at 5101 N. Western Avenue in Oklahoma City (moderate-income census tract), and a full-service branch location at 10900 Hefner Pointe Drive in Oklahoma City (upper-income census tract). Both locations include drive-thru facilities, and the Western Avenue location has a drive-thru Automated Teller Machine (ATM). Additionally, FNBOK has established an agreement with the FIS NYCE Network, the bank’s ATM provider, to allow customers surcharge free access to over 100 Transfund ATMs located in Oklahoma City metro area 7-11 stores.

Within the Oklahoma Non-MSA AA, FNBOK serves the area with a full-service branch at 1501 East Prospect Avenue, Ponca City (middle-income census tract), and 101 West Grand, Tonkawa (middle-income census tract). Both locations in Kay County include drive-thru facilities and ATMs. There are no low-income census tracts (CTs) in Kay County. The bank also owns and operates ATMs at Venture Foods in Tonkawa and at the Stop-N-Go on South 14th Street and the Ponca City Medical Center in Ponca City. FNBOK has not closed any banking locations since the previous evaluation.

FNBOK offers a diverse line of loan and deposit products and services during reasonable hours Monday through Saturday. FNBOK also offers an internet banking product that provides customers with deposit, transfer, bill payment, and cash management services when a bank facility is not convenient. FNBOK’s strategic lending focus remains consumer real estate purchase, refinance, agriculture, general commercial, commercial real estate (CRE), and consumer lending. The following table describes the composition of FNBOK’s loan portfolio as of December 31, 2023, which represents 79 percent of total assets. Bank management does not anticipate significant changes to the composition of the loan portfolio in the near future.

Loan Distribution - FNBOK as of December 31, 2023		
Loan Category	\$ (000)	% of Gross Loans
Consumer Loans	\$ 8,411	1.4%
Commercial Loans	\$ 73,537	12.0%
Construction	\$ 38,548	6.3%
Residential Real Estate Loans	\$ 166,954	27.3%
Commercial Real Estate Loans	\$ 252,848	41.3%
Farmland/Agricultural Loans	\$ 52,702	8.6%
Other Loans	\$ 18,847	3.1%
Total	\$ 611,847	100.0%

Source: 12/31/2023 Call Report Data

Based on the June 30, 2023, Federal Deposit Market Share Report, FNBOK's presence within the AA is reasonable as they have 0.83 percent of the deposit market share in Oklahoma County, and 24.83 percent of the deposit market share in Kay County. Competition for deposits in Oklahoma County is considerable as many of the institutions within Oklahoma County are large or midsize banks with resources significantly exceeding that of FNBOK. A CRA Performance Evaluation (PE) was last prepared February 22, 2021, and an "Outstanding" rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBOK using the Intermediate Small Bank standards for assessing performance. Within the Oklahoma Partial MSA AA, FNBOK's primary loan products include home mortgage loans and commercial loans. We assessed lending performance within the Oklahoma Partial MSA AA in 2021 under the CRA using all home mortgage loan originations reported under the HMDA from January 1, 2021, through December 31, 2021, and a random sample of 25 small business loans originated during the same period. We assessed lending performance within Oklahoma Partial MSA AA in 2022 and 2023 under the CRA using all home mortgage loan originations reported under the HMDA from January 1, 2022, through December 31, 2023, and a random sample of 23 small business loans originated during the same period. Within the Oklahoma Non-MSA AA, FNBOK's primary loan products include home mortgage loans and consumer loans. We assessed lending performance both for the 2021 time period and 2022-2023 time period under the CRA using the HMDA sample referenced above and a random sample of 32 consumer loans for 2021 and a random sample of 32 consumer loans for 2022-2023. The comprehensive sample is representative of FNBOK's business strategy since the last CRA PE. The CD test evaluates FNBOK's responsiveness to meet the credit and development needs of its AAs. We assessed the bank's performance under this test by reviewing qualified CD loan, CD investment, and CD services activity during the evaluation period.

Selection of Areas for Full-Scope Review

FNBOK's AAs comprises Oklahoma County (Oklahoma Partial MSA) and Kay County (Oklahoma Non-MSA) within the state of Oklahoma. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income (LMI) geographies. Two AAs were designated for full-scope

reviews, and there are no areas designated as limited-scope AAs. Full-scope reviews are conducted in AAs where the bank has a substantial share of its deposit and loan business; therefore, we placed slightly more emphasis on performance in the Oklahoma Partial MSA AA as it contains a majority of the bank's loans and deposits.

Ratings

The bank's overall rating is a blend of the state ratings. FNBOK has only one rating area, the state of Oklahoma, and the bank's overall rating is based on the full-scope reviews of the two AAs within the state. Within the Oklahoma Non-MSA AA FNBOK is primarily a consumer and home mortgage lender; therefore, we placed more weight on the bank's lending in these products. Within the Oklahoma Partial MSA AA, FNBOK is primarily a commercial and home mortgage lender; therefore, we placed more weight on the bank's lending in these products.

Discriminatory or Other Illegal Credit Practices Review

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

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

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Outstanding.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services
- FNBOK's distribution of home mortgage, consumer, and small business loans reflects a reasonable distribution of loan originations among borrowers of different income levels and businesses with different levels of gross annual revenues.
- The geographic distribution of home mortgage, consumer, and small business loans reflects a reasonable distribution of loans through FNBOK's AAs.

Description of Institution's Operations in Oklahoma

FNBOK has four banking locations and three ATMs. The bank has designated two AAs: Oklahoma Partial MSA AA and Oklahoma Non-MSA AA. Within the Oklahoma Partial MSA AA there is significant competition for deposits and loans with the top five banks in the area demonstrating a strong market presence holding roughly \$29 billion in deposits and 69 percent of the market share, in comparison to FNBOK's \$351 million in deposits and 0.83 percent market share. Within the Oklahoma Non-MSA AA there is limited competition for deposits with only 8 banking institutions within Kay County. FNBOK has roughly a 25 percent market share in the AA, the second largest.

The Oklahoma Partial MSA AA assessment area is a portion of the Oklahoma MSA and includes two bank locations. The Oklahoma Partial MSA AA includes 26 low-income CTs and 85 moderate-income CTs, 73 middle-income CTs, 67 upper-income CTs, and 15 CTs without a designation. Deposits at the two AA locations represent 54 percent of the bank's total deposits.

The Oklahoma Non-MSA AA includes two branch locations and includes 2 moderate-income CTs, 7 middle-income CTs, and 2 upper-income CTs. Deposits at the two AA locations represent 46 percent of the bank's total deposits.

We referenced a community contact within the Oklahoma Partial MSA AA during the evaluation. The contact noted small business and startup loans as the main credit needs of the area. The contact believes local financial institutions are involved with small business lending and other credit needs. We also referenced a community contact within the Oklahoma Non-MSA AA. The contact noted multiple opportunities for financial institutions to partake in community development and identified FNBOK as a participant in those programs. FNBOK management also participates in local committees which identify projects that would benefit the area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma Partial MSA AA 2021						
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: Oklahoma Partial MSA AA 2022-2023						
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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma Non-MSA AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	27.3	54.5	18.2	0.0
Population by Geography	45,587	0.0	23.8	59.0	17.2	0.0
Housing Units by Geography	21,626	0.0	23.4	60.3	16.3	0.0
Owner-Occupied Units by Geography	12,488	0.0	20.5	58.1	21.3	0.0
Occupied Rental Units by Geography	5,627	0.0	24.0	68.4	7.5	0.0
Vacant Units by Geography	3,511	0.0	32.3	55.3	12.4	0.0
Businesses by Geography	3,459	0.0	22.7	57.2	20.1	0.0
Farms by Geography	274	0.0	13.1	65.3	21.5	0.0
Family Distribution by Income Level	11,553	21.4	18.4	19.7	40.5	0.0
Household Distribution by Income Level	18,115	23.3	17.2	17.3	42.2	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$80,562
			Median Gross Rent			\$621
			Families Below Poverty Level			13.6%
<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: Oklahoma Non-MSA AA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	63.6	18.2	0.0
Population by Geography	43,700	0.0	17.3	64.2	18.5	0.0
Housing Units by Geography	21,455	0.0	17.7	64.5	17.8	0.0
Owner-Occupied Units by Geography	11,508	0.0	15.3	62.2	22.5	0.0
Occupied Rental Units by Geography	5,884	0.0	18.5	68.3	13.3	0.0
Vacant Units by Geography	4,063	0.0	23.4	65.8	10.9	0.0
Businesses by Geography	4,338	0.0	11.5	67.2	21.3	0.0
Farms by Geography	335	0.0	11.6	63.9	24.5	0.0
Family Distribution by Income Level	10,954	20.1	19.5	20.5	39.9	0.0
Household Distribution by Income Level	17,392	22.2	16.0	18.6	43.2	0.0
Median Family Income Non-MSAs - OK		\$58,565	Median Housing Value			\$94,025
			Median Gross Rent			\$687
			Families Below Poverty Level			12.8%
<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>						

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated **Satisfactory**.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

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.

The bank's home mortgage lending within the Oklahoma Partial MSA AA is excellent. The percentage of loans to borrowers in both low- and moderate-income CTs exceeded the percentage of owner-occupied housing units in both the 2021 and 2022-2023 evaluation periods.

The bank's home mortgage lending within the Oklahoma Non-MSA AA is reasonable. The Oklahoma Non-MSA AA had no low-income CTs during the evaluation period and only three and two moderate-income CTs in 2021 and 2022-2023, respectively, which limits lending opportunities to LMI geographies within this AA. In 2021 and 2022-23, the bank's lending to moderate-income CTs was below the percentage of owner-occupied housing units but reasonable given the small number of LMI CTs within the AA. Aggregate lending to moderate-income CTs was also below the percentage of owner-occupied units.

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.

The bank's distribution of loans to small businesses by income level of the geography within the Oklahoma Partial MSA AA is reasonable. In 2021, the bank's lending to low-income CTs significantly exceeded the percentage of small businesses within these CTs, while the bank's lending to moderate-income CTs was near the percentage of small businesses within these CTs. In 2022-2023, the bank's lending to low-income CTs exceeded the percentage of small businesses within these CTs, while lending to moderate-income CTs was near the percentage of small businesses within these CTs.

The Oklahoma Partial MSA AA was the only AA used for this analysis as the bank has not originated a sufficient volume of loans to small businesses in the Oklahoma Non-MSA AA to conduct a meaningful analysis.

Consumer Loans

Refer to Table U in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank's distribution of consumer loans by income category of the geography within the Oklahoma Non-MSA AA is poor. The bank had no loans within moderate-income CTs in 2021. The percentage of loans within moderate-income CTs in 2022-2023 was below the percentage of households within moderate-income CTs. As noted prior, there are a small number of LMI CTs within this AA, which somewhat limits lending opportunities to LMI geographies.

The Oklahoma Non-MSA AA was the only AA used for this analysis as consumer loans were not one of the bank's primary products in the Oklahoma Partial MSA AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 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.

The bank's distribution of home mortgage loans by income level of the borrower within the Oklahoma Partial MSA AA is poor. The bank's distribution of loans by income level is significantly impacted by the demographics of the AA, which includes a large number of rental units and renters classified as LMI. In 2021, loans to both low-income borrowers and moderate-income borrowers were below the percentage of low-income and moderate-income families. In 2022-2023, loans to both low-income borrowers and moderate-income borrowers were also below the percentage of low-income and moderate-income families.

The bank's distribution of home mortgage loans by income level of the borrower within the Oklahoma Non-MSA AA is reasonable. In 2021, loans to low-income borrowers were below the percentage of low-income families; however, loans to moderate-income families were close to the percentage of moderate-income families and exceeded aggregate lending to moderate-income borrowers. In 2022-2023, loans to both low-income borrowers and moderate-income borrowers were below the percentage of low-income and moderate-income families. The bank's lending has generally been near the percentage of aggregate lending to these groups within the evaluation period.

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 originations and purchases of small loans to businesses.

The bank's distribution of loans to small businesses by annual revenues within the Oklahoma Partial MSA is reasonable. The percentage of bank loans to businesses with revenues less than or equal to \$1 million is less than the reported percentage of business with revenues less than or equal to \$1 million but exceeded the aggregate lending to those businesses in both 2021 and 2022-2023.

Only the Oklahoma Partial MSA AA was used for this analysis as small business loans were not one of the bank's primary products in the Oklahoma Non-MSA AA.

Consumer Loans

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

The bank's distribution of consumer loans based upon income level of the borrower within the Oklahoma Non-MSA AA is reasonable. The percentage of bank loans made to low-income borrowers was near the percentage of low-income households in 2021 and 2022-2023. The percentage of bank loans to moderate-income borrowers exceeded the percentage of moderate-income households in 2021 and 2022-2023.

Only the Oklahoma Non-MSA AA was used in this analysis as consumer loans were not one of the bank's primary products in the Oklahoma Partial MSA AA.

Responses to Complaints

There were no CRA related complaints in this state during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Community Development Loans

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

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Oklahoma Partial MSA AA	78	66.1	68,629	82.5
OK non-MSA AA	40	33.9	14,582	17.5
Total	118	100.0	83,211	100.0

Oklahoma Partial MSA AA

The number and dollar level of qualified CD loans within the Oklahoma Partial MSA AA reflect excellent responsiveness.

During the evaluation period FNBOK originated 78 loans to 41 borrowers totaling \$68.6 million. These loans provided funding to local small businesses for economic development within the AA, including LMI areas, and to create and retain LMI jobs. Examples include \$5.5 million across seven loans to one borrower for working capital and expanding manufacturing capacity to keep and employ more LMI employees and two loans totaling \$6 million to one borrower to create and build a franchise business with majority LMI employees.

Additionally, the bank originated three loans totaling \$5.1 million to a local organization that builds and places LMI individuals in new construction housing. This organization places these new construction homes in LMI areas near transportation and employment opportunities.

FNBOK was also very active in the second round of the Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the Coronavirus (COVID-19) pandemic. FNBOK's participation resulted in the origination of 41 qualifying PPP loans totaling \$8.9 million to business owners in the AA. These loans are not captured in the table above but reflect favorably on the bank's responsiveness to the credit needs of its AAs.

Oklahoma Non-MSA AA

The number and dollar level of qualified CD loans within the Oklahoma Non-MSA AA reflect excellent responsiveness.

During the evaluation period FNBOK originated 40 loans to 21 borrowers totaling \$14.6 million. These loans provided funding to small businesses in Kay County for business expansion and to create and retain LMI jobs. Examples include \$914 thousand across four loans to build new business facilities and equipment to hire more LMI individuals, as well as \$2.3 million across four loans to provide working capital and materials purchases for a local manufacturing company that employs majority LMI individuals.

FNBOK was also active in the second round of the PPP within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 pandemic.

FNBOK's participation resulted in the origination of 17 qualifying PPP loans totaling \$1.6 million to business owners in the AA. These loans are not captured in the table above but reflect favorably on the bank's responsiveness to the credit needs of its AAs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma Partial MSA AA	1	500,000	1	1,300,000	2	13.3	1,800,000	22.7	--	--
Oklahoma Non-MSA AA	5	1,110,000	8	5,005,000	13	86.7	6,115,000	77.3	--	--

* 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 Partial MSA AA

The number and dollar amount of qualified CD investments within the Oklahoma Partial MSA AA reflect adequate responsiveness.

FNBOK maintains a \$500 thousand Equity Equivalent Investment in MetaFund, a CRA-qualified Community Development Financial Institution and Community Development Entity. In addition to providing affordable housing for low-income individuals and families and financing commercial projects in LMI areas, MetaFund provides assistance with financing and credit services for businesses throughout the Oklahoma Partial MSA AA.

FNBOK also donated \$190.8 thousand to 23 qualified organizations within the Oklahoma Partial MSA AA during the evaluation period. Donations were made to local nonprofit organizations that provide economic development support in the AA as well as social services, youth programs, job skills training, and housing needs that target LMI individuals and families.

Oklahoma Non-MSA AA

The number and dollar amount of qualified CD investments within the Oklahoma Non-MSA AA reflect excellent responsiveness.

During the evaluation period FNBOK invested in 13 qualified municipal investment securities totaling \$6.1 million. The investments in five school districts within Kay County are to finance various renovation and improvement activities in school buildings. In all of the school districts FNBOK invested in, over 50 percent of the student populations were considered low-income and qualify for the federal free- or reduced-price lunch program.

FNBOK also donated \$85 thousand to 16 qualified organizations within the Oklahoma Non-MSA AA over the evaluation period. These donations were made to local non-profits in Kay County that provide social services, promote downtown revitalization, job skills training, and children's resources for LMI individuals and families in the AA.

Extent to Which the Bank Provides Community Development Services

Oklahoma Partial MSA AA

The extent of qualified CD services within the Oklahoma Partial MSA AA reflects excellent responsiveness.

Five bank officers serve in various leadership roles in nine organizations that are involved in economic or small business development activities or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. Examples of qualifying CD services include:

The Education and Employment Ministry (TEEM)

A bank officer serves as a board member and Chairman of this organization. This organization is a non-profit organization whose focus is helping Oklahomans exiting incarceration re-enter society by providing education, social services, and job placement and training. TEEM helps their clients overcome barriers holding them back from finding and keeping employment by securing transportation, identification, housing, appropriate clothing, and other basic needs. These clients are LMI individuals in the AA. This officer assists with TEEM's strategic planning and fundraising activities.

Positive Tomorrows

A bank officer serves as the executive vice president of this organization. This organization is a non-profit organization whose focus is to help children and families in Oklahoma escape homelessness. Positive Tomorrows helps participants by removing barriers to a child receiving the education, food security, transportation, and basic necessities they need to excel in school. They provide remedial education for children who have fallen behind their age group in school. They also help parents with housing and employment opportunities with upward mobility so they can increase their income.

Oklahoma Non-MSA AA

The extent of qualified CD services within the Oklahoma Non-MSA AA reflects adequate responsiveness.

Four bank officers serve in leadership positions in five organizations that are involved in economic or small business development activities, or in organizations that provide community services to LMI residents within the AA. Their donation of time and expertise includes providing technical and financial assistance to these organizations. Examples of qualifying CD services include:

Wheatland Resource Conservation and Development (RC&D)

A bank officer serves as a board member and Treasurer for RC&D. RC&D is a non-profit organization that serves a number of counties, including Kay County, to promote and enhance economic development of rural areas, support local community leaders, and promote a safe and quality living environment. RC&D also works with local banks and REI Oklahoma in assisting entrepreneurs establishing new businesses or expanding existing businesses by providing them with the equity necessary to qualify for bank financing.

Marland Children's Home

A bank officer serves on the Board of Directors of the Marland Children's Home and is currently a member of the Finance Committee. The Marland Children's Home provides a safe, nurturing home, education services, counseling and treatment services, job training, and general life skills for young men and women between the ages of 11 and 18. These children are wards of the state of Oklahoma and many of them have previously been victims of neglect and abuse.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/2021 to 12/31/2023)	
Bank Products Reviewed:	Home Mortgage Loans Small Business Loans Consumer Loans Community Development Investments Community Development Loans Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Oklahoma Partial MSA	Full-Scope	
Oklahoma Non-MSA	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS – First National Bank of Oklahoma			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Oklahoma	Satisfactory	Outstanding	Outstanding
MMSA or State:			
Oklahoma	Satisfactory	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan 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.

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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

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

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

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

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

Table 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Oklahoma Non-MSA AA 2021	78	8,818,380	27.0	1,089	0.0	0.0	0.0	20.5	9.0	13.2	58.1	71.8	54.3	21.3	19.2	32.5	0.0	0.0	0.0	
Oklahoma Partial MSA AA 2021	211	48,738,286	73.0	35,403	6.1	9.5	3.4	25.8	46.0	17.7	32.5	17.5	29.4	35.4	26.5	49.2	0.1	0.5	0.2	
Total	289	57,556,666	100.0	36,492	5.7	6.9	3.3	25.5	36.0	17.6	34.2	32.2	30.2	34.5	24.6	48.7	0.1	0.3	0.2	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-23
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 Non-MSA AA 2023	143	17,203,769	28.3	734	0.0	0.0	0.0	15.3	5.6	14.7	62.2	72.0	60.4	22.5	22.4	24.9	0.0	0.0	0.0	
Oklahoma Partial MSA AA 2023	363	99,548,626	71.7	17,156	5.9	11.0	6.1	26.4	35.0	24.1	31.8	28.4	30.8	34.7	25.3	38.2	1.3	0.3	0.9	
Total	506	116,752,395	100.0	17,890	5.6	7.9	5.8	25.7	26.7	23.7	33.6	40.7	32.0	33.9	24.5	37.7	1.2	0.2	0.8	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate.

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.

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 Non-MSA AA 2021	78	8,818,380	27.0	1,089	21.4	1.3	5.4	18.4	15.4	14.0	19.7	12.8	15.5	40.5	51.3	34.3	0.0	19.2	30.8
Oklahoma Partial MSA AA 2021	211	48,738,286	73.0	35,403	24.7	2.4	5.1	17.9	3.3	13.7	19.1	4.7	15.8	38.3	12.3	33.7	0.0	77.3	31.7
Total	289	57,556,666	100.0	36,492	24.5	2.1	5.1	17.9	6.6	13.7	19.2	6.9	15.8	38.5	22.8	33.7	0.0	61.6	31.7

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Oklahoma Non-MSA AA 2023	143	17,203,769	28.3	734	20.1	4.9	6.9	19.5	4.9	16.2	20.5	21.0	20.3	39.9	51.0	29.7	0.0	18.2	26.8
Oklahoma Partial MSA AA 2023	363	99,548,626	71.7	17,156	24.1	5.5	6.3	18.7	7.7	16.2	18.8	3.9	17.3	38.4	16.5	31.9	0.0	66.4	28.3
Total	506	116,752,395	100.0	17,890	23.9	5.3	6.3	18.7	6.9	16.2	18.9	8.7	17.4	38.5	26.3	31.8	0.0	52.8	28.2

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate*

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Oklahoma Non-MSA AA 2021	--	--	--	1,271	0.0	--	0.0	22.7	--	21.0	57.2	--	57.9	20.1	--	20.3	0.0	--	0.8
Oklahoma Partial MSA AA 2021	25	3,305,335	100.0	21,934	6.6	20.0	6.6	25.6	12.0	24.2	29.4	48.0	29.0	34.3	20.0	36.2	4.1	0.0	3.9
Total	25	3,305,335	100.0	23,205	6.4	20.0	6.2	25.6	12.0	24.1	30.2	48.0	30.6	33.9	20.0	35.4	4.0	0.0	3.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-23
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 Non-MSA AA 2023	--	--	--	850	0.0	--	0.0	11.5	--	11.6	67.2	--	66.1	21.3	--	20.9	0.0	--	1.4
Oklahoma Partial MSA AA 2023	23	2,830,654	100.0	20,262	6.5	21.7	5.8	27.3	21.7	26.1	27.4	26.1	26.5	36.5	30.4	38.9	2.2	0.0	2.6
Total	23	2,830,654	100.0	21,112	6.3	21.7	5.6	26.8	21.7	25.5	28.5	26.1	28.1	36.1	30.5	38.2	2.2	0.0	2.6

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%
 First National Bank of Oklahoma (10000011397) excluded from Aggregate

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Oklahoma Non-MSA AA 2021	--	--	--	1,271	82.6	--	59.6	5.0	--	12.4	--	
Oklahoma Partial MSA AA 2021	25	3,305,335	100.0	21,934	89.5	48.0	40.1	3.3	48.0	7.2	4.0	
Total	25	3,305,335	100.0	23,205	89.3	48.0	41.2	3.4	48.0	7.3	4.0	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% First National Bank of Oklahoma (10000011397) excluded from Aggregate</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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 Non-MSA AA 2023	--	--	--	850	86.1	--	61.8	3.5	--	10.3	--	
Oklahoma Partial MSA AA 2023	23	2,830,654	100.0	20,262	91.8	56.5	51.0	2.5	43.5	5.7	0.0	
Total	23	2,830,654	100.0	21,112	91.7	56.5	51.4	2.5	43.5	5.9	0.0	
<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% First National Bank of Oklahoma (10000011397) excluded from Aggregate</i>												

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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2021
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Oklahoma Non-MSA AA 2021	32	657,309	100.0	0.0	0.0	21.6	0.0	61.3	78.1	17.1	21.9	0.0	0.0	
Oklahoma Partial MSA AA 2021	--	--	--	9.6	--	33.0	--	30.3	--	26.7	--	0.4	--	
Total	32	657,309	100.0	9.0	0.0	32.3	0.0	32.1	78.1	26.1	21.9	0.4	0.0	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography														2022-23
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Oklahoma Non-MSA AA 2023	32	687,724	100.0	0.0	0.0	16.4	3.1	64.2	68.8	19.4	28.1	0.0	0.0	
Oklahoma Partial MSA AA 2023	--	--	--	8.5	--	32.8	--	30.2	--	26.8	--	1.7	--	
Total	32	687,724	100.0	8.1	0.0	31.9	3.1	32.0	68.8	26.4	28.1	1.6	--	

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

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Oklahoma Non-MSA AA 2021	32	657,309	100.0	23.3	15.6	17.2	21.9	17.3	25.0	42.2	37.5	0.0	0.0	
Oklahoma Partial MSA AA 2021	--	--	--	26.1	--	17.7	--	17.5	--	38.7	--	0.0	--	
Total	32	657,309	100.0	26.0	15.6	17.6	21.9	17.5	25.0	38.9	37.5	0.0	0.0	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Oklahoma Non-MSA AA 2023	32	687,724	100.0	22.2	15.6	16.0	25.0	18.6	18.8	43.2	40.6	0.0	0.0	
Oklahoma Partial MSA AA 2023	--	--	--	26.3	--	17.3	--	18.2	--	38.2	--	0.0	--	
Total	32	687,724	100.0	26.1	15.6	17.2	25.0	18.2	18.8	38.5	40.6	0.0	0.0	

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

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