



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

October 13, 2025

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company of Ardmore  
Charter Number: 13677

405 W Main Street  
Ardmore, OK 73401

Office of the Comptroller of the Currency  
8282 South Memorial Drive, Suite 300  
Tulsa, OK 74133

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**

**The lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on the Satisfactory performance in the state of Oklahoma.
- The First National Bank and Trust Company of Ardmore's (FNBT or bank) loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans were originated within the bank's assessment areas (AAs).
- The geographic distribution of loans was reasonable.
- The distribution of loans to individuals of different income levels and businesses of different sizes was reasonable.
- The Community Development (CD) Test rating is based on Satisfactory performance in the state of Oklahoma.
- CD lending, investments, and services reflect adequate responsiveness to the needs of the bank's AAs considering the bank's capacity, community needs, and the availability of opportunities for CD.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of its AAs, the bank's LTD ratio was reasonable. FNBT's quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 71.21 percent. FNBT's LTD ratio is comparable to the quarterly average of four similarly situated banks with locations in their market areas. The peer banks' LTD ratios ranged from 60.17 percent and 91.69 percent with an aggregate average LTD ratio of 74.74 percent.

### Lending in Assessment Area

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

The bank originated and purchased 85.89 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	322	85.19	56	14.81	378	49,943	80.42	12,158	19.58	62,101
Small Business	816	86.17	131	13.83	947	115,080	75.20	37,944	24.80	153,024
Total	1,138	85.89	187	14.11	1,325	165,023	76.71	50,102	23.29	215,125

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

## Description of Institution

FNBT is a community bank with \$662 million in total assets as of December 31, 2024, and is headquartered in Ardmore, Oklahoma in the south-central part of the state. FNBT is a subsidiary of The First National Corporation of Ardmore, Inc., a one-bank holding company also headquartered in Ardmore, Oklahoma. As of December 31, 2024, tier 1 capital was \$63 million, and loans totaled \$415 million or 62.7 percent of total assets. The loan portfolio consists of \$227 million in commercial loans, \$86 million in residential real estate loans, \$25 million in agricultural real estate, \$27 million in agricultural loans, and \$50 million in other loans.

The bank's main branch is located at 405 W Main Street with a separate motor bank and ATM located across the street. FNBT has 11 branches and 12 ATMs all located within the state of Oklahoma and within its AAs. FNBT's primary focus is to serve the financial needs of commercial and consumer customers in its AAs. The bank meets these needs by offering many different loan and deposit products and various types of banking services including internet banking, telephone banking, mobile banking, and asset management services. The bank also sells non-deposit investment products to retail customers through a third-party provider. Bank lobby and services are provided Monday through Friday at all branch locations.

There are no known legal, financial, or other factors impeding management's ability to help meet the credit needs of the designated AA. The bank earned a rating of "Satisfactory" in its May 31, 2022, CRA PE.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of FNBT's CRA activities in its AAs, under the Intermediate Small Bank CRA procedures, which includes the lending test and the CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments and donations, and services. The evaluation period includes all reported activity from January 1, 2022, to December 31, 2024.

Conclusions regarding the lending test are based on samples of business loans originated in 2022, 2023, and 2024 and home mortgage loans reported on the HMDA loan application register over the same periods. There was no peer aggregate business lending data available for the year 2024 at the time of this report, and the bank opened a new branch in the Oklahoma City Partial MSA in late 2023. Considering these factors, we evaluated lending test performance in 2024 separately from the years 2022 and 2023. Conclusions regarding the CD test are based on the bank's CD activities during the entire evaluation period.

There were no Office of Management and Budget changes in the AAs during the evaluation period.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated 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. FNBT has two rating areas for the state of Oklahoma, the Oklahoma City Partial MSA and Oklahoma Non-MSA. Both AAs received a full-scope review.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **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<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution of loans to low- and moderate-income (LMI) tracts for home mortgage and small business lending
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable
- CD lending reflects adequate responsiveness to the needs of the bank's AA.
- CD qualified investments reflects adequate responsiveness to the needs of the AA.

### Description of Institution's Operations in Oklahoma

The bank operates 11 branches and 12 ATMs in the two AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending addition to the traditional suite of loan and deposit products to meet the needs of their community. Primary loan products in both AAs were similar so we chose the same products for analysis in both AAs.

### Oklahoma City Partial MSA

The Oklahoma City Partial MSA consists of 337 CTs, including all of Cleveland and Oklahoma County in the Oklahoma City metro area. In this AA, there are 28 low-income CTs, 92 moderate-income CTs, 111 middle-income CTs, 87 upper income CTs, and 19 CTs without income designations. The AA meets the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

Competition in the Oklahoma City Partial MSA is strong with 66 other financial institutions in the areas, including several large regional banks. Based on FDIC Deposit Market Share data as of December 31, 2024, FNBT holds 0.2 percent of the market share of deposits and is ranked 63<sup>rd</sup> among financial institutions in the AA.

We referenced one community contact during the evaluation period for this AA, an economic development organization located within the Oklahoma City metro area. The contact indicated the local economy was good, with unemployment and cost of living below the national average. The contact identified small business, and startup loans a primary credit need in the AA and noted opportunities for participation for financial institutions in multiple credit-related projects, including the Metropolitan Area Projects campaign.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area(s) - 2024 Partial OKC MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	337	8.31	27.30	32.94	25.82	5.64
Population by Geography	1,091,820	7.04	25.29	36.06	29.62	1.98
Housing Units by Geography	457,521	7.27	27.18	36.82	26.95	1.78
Owner-Occupied Housing by Geography	251,110	4.42	20.50	37.94	35.99	1.14
Occupied Rental Units by Geography	162,740	10.47	35.35	36.19	15.46	2.52
Vacant Units by Geography	43,671	11.74	35.07	32.71	17.80	2.68
Businesses by Geography	51,824	5.70	24.14	32.83	34.41	2.92
Farms by Geography	1,862	4.89	23.20	34.64	35.98	1.29
Family Distribution by Income Level	257,016	22.25	17.87	20.06	39.81	0.00
Household Distribution by Income Level	413,850	24.66	17.06	18.36	39.93	0.00
Unemployment rate (%)	4.62	7.91	5.89	4.18	2.92	12.67
Households Below Poverty Level (%)	14.03	31.32	20.28	11.61	6.12	31.27
Median Family Income (36420 - Oklahoma City, OK MSA)		\$75,170		Median Housing Value		\$143,200
Median Family Income (36420 - Oklahoma City, OK MSA) for 2024		\$89,100		Median Gross Rent		\$877
				Families Below Poverty Level		10.40
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						

## Oklahoma Non-MSA

The Oklahoma Non-MSA consists of 44 CTs, including all of Carter, Jefferson, Love, Marshall, Murray, and Stephens Counties. In this AA, there are no low-income CTs, nine moderate-income CTs, 26 middle-income CTs, and nine upper income CTs. The AA meets the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

Competition in the Oklahoma Non-MSA is moderate with 19 other financial institutions in the areas, including several large regional banks. Based on FDIC Deposit Market Share data as of December 31, 2024, FNBT holds 12.97 percent of the market share of deposits and is ranked 3<sup>rd</sup> among financial institutions in the AA.

We referenced one community contact during the evaluation period for this AA, an economic development organization located within the AA. The contact indicated the local economy was stable overall and that new grocery stores and restaurants have opened due to population growth in the area. The contact identified a lack of affordable housing and auto loans as the area’s most pressing credit need, though they also noted that local financial institutions have generally been proactive in meeting the banking needs of the community.

Assessment Area(s) - 2024 Oklahoma Non-MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	0.00	20.45	59.09	20.45	0.00
Population by Geography	135,550	0.00	16.42	55.90	27.68	0.00
Housing Units by Geography	67,671	0.00	16.26	59.40	24.34	0.00
Owner-Occupied Housing by Geography	37,678	0.00	12.96	59.37	27.67	0.00
Occupied Rental Units by Geography	14,716	0.00	23.71	50.65	25.64	0.00
Vacant Units by Geography	15,277	0.00	17.22	67.91	14.87	0.00
Businesses by Geography	4,805	0.00	14.92	54.34	30.74	0.00
Farms by Geography	351	0.00	12.25	65.53	22.22	0.00
Family Distribution by Income Level	34,759	19.87	16.78	20.80	42.55	0.00
Household Distribution by Income Level	52,394	21.03	15.73	17.64	45.59	0.00
Unemployment rate (%)	5.08	0.00	6.61	4.94	4.52	0.00
Households Below Poverty Level (%)	15.34	0.00	22.98	14.36	12.89	0.00
Median Family Income (Non-MSAs - OK)		\$58,565			Median Housing Value	\$107,600
Median Family Income (Non-MSAs - OK) for 2024		\$69,000			Median Gross Rent	\$714
					Families Below Poverty Level	12.18
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

The Oklahoma City Partial MSA and the Oklahoma Non-MSA will both be evaluated under full-scope procedures. Loan products reviewed in both full-scope AAs were all HMDA loans originated in 2022, 2023, and 2024 and a random sample of small business loans for the same time-period. There are no low-income geographies in the Oklahoma Non-MSA, so performance in low-income geographies was not considered for this AA. Aggregate peer lending data for small businesses was not available for the year 2024, so separate tables and analysis was performed for the time-period of 2022-2023 and the year 2024. More weight was given to performance during the time-period of 2022-2023 in instances where 2024 data was unavailable.

## 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 Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s lending performance in the state of Oklahoma was reasonable.

### Distribution of Loans by Income Level of the Geography

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

## **Oklahoma City Partial MSA**

### ***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.

For the time-period 2022-2023 and the year 2024, the bank originated no home mortgage loans in low-income tracts in the AA. Only 8.3 percent of CTs in the Oklahoma City Partial MSA are low-income. Furthermore, 7.3 percent of housing units in the AA are in low-income tracts and homeownership in the AA is 4.4 percent in low-income tracts, demonstrating limited opportunity to lend in the low-income CTs.

In both 2022-2023 and 2024 the percentage of bank loans to moderate-income tracts exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA.

### ***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.

For the time-period of 2022-2023, the distribution to LMI tracts is near to the percentage of businesses located in the geography and exceeds the aggregate lending level.

For the time-period of 2024, there were no bank loans to businesses in low-income tracts. The percentage of small businesses located in low-income tracts in the AA is 5.7 percent, indicating limited opportunity to lend in low-income CTs. The percentage of bank loans to moderate-income tracts in 2024 was slightly lower than the percentage of small businesses located in moderate-income tracts. There was no peer aggregate data available for the year 2024 at the time of this report.

## **Oklahoma Non-MSA**

### ***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.

For the time-period 2022-2023 and the year 2024, there were no low-income tracts in the AA, thus the bank originated no home mortgage loans in low-income tracts in the AA.

The percentage of bank loans to moderate-income tracts exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA for the period of 2022-2023 and 2024.

### ***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.

For the time-period 2022-2023 and the year 2024, there were no low-income tracts in the AA, thus the bank originated no small business loans in low-income tracts in the AA.

Bank loans to moderate- income tracts during the 2022-2023 period exceeded the percentage of businesses located in the geography and the aggregate lending level. In 2024, the percentage of loans to moderate-income tracts exceeded the percentage of businesses located in the geography. There was no peer aggregate data available for the year 2024 at the time of this report.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibited 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.

### **Oklahoma City Partial MSA**

#### ***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.

For the time periods of 2022-2023 and 2024, the percentage of bank loans to both low- and moderate-income borrowers was lower than the percentage of low-and moderate-income families and aggregate lending level of peer institutions. Of the 43 home mortgages loans originated within the AA, income information was not available for 22 of these borrowers, which may have skewed lending percentages.

#### ***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.

For the time period of 2022-2023, the percentage of bank loans to small businesses was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for these businesses.

For the year 2024, the percentage of bank loans to small businesses was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million. There was no peer aggregate data available for the year 2024 at the time of this report.

## **Oklahoma Non-MSA**

### ***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.

For the time period 2022-2023, the percentage of bank loans to low-income borrowers was lower than the percentage of low-income families in the AA but exceeded the aggregate lending level. The percentage of bank loans to moderate-income borrowers was lower than the percentage of moderate-income families and the aggregate lending level.

For the year 2024, the percentage of loans to both low- and moderate-income borrowers was lower than the percentage of both low- and moderate-income families and the aggregate lending level.

### ***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.

For the time period of 2022-2023, the percentage of bank loans to small businesses was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for these businesses.

For the year 2024, the percentage of bank loans to small businesses exceeded the percentage of businesses identified as having revenues of less than or equal to \$1 million. There was no peer aggregate data available for the year 2024 at the time of this report.

### **Responses to Complaints**

The bank did not have any 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 Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank exhibited adequate 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 AA.

## Number and Amount of Community Development Loans

The following Community Development Loans Table 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.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Oklahoma City Partial MSA	3	11.54	13,717	48.63
Oklahoma Non-MSA	23	88.46	14,489	51.37
<b>Total</b>	<b>26</b>	<b>100.00</b>	<b>28,206</b>	<b>100.00</b>

### Oklahoma City Partial MSA

The level of community development loans in this AA indicates adequate responsiveness to the needs of the AA. During the evaluation period, the bank originated or renewed three CD loans totaling \$13.7 million. The three loans were made for economic development purposes. The following are examples of CD loans made in this AA:

- A \$13 million loan for the purchase of a hotel located in a moderate-income tract in Oklahoma County expected to create or retain 45 LMI jobs.
- A \$567,000 loan to purchase and renovate a convenience store in a moderate-income tract within the AA expected to create or retain four LMI jobs.

### Oklahoma Non-MSA

The level of community development loans in this AA indicates adequate responsiveness to the needs of the AA. During the evaluation period, the bank originated or renewed 23 CD loans totaling \$14.5 million. This included 15 loans totaling \$4.7 million for economic development, four loans totaling \$1.2 million for revitalization and stabilization, and four loans totaling \$8.6 million for community services. The following are examples of CD loans made in this AA:

- A \$4 million loan to a non-profit behavioral wellness center that provides behavioral health services to families, children, and adults, including those without any ability to repay.
- A \$275,000 loan to the City of Madill, Oklahoma to purchase a sewer cleaning machine for the city located in a moderate-income tract.
- A \$1.1 million loan to construct a convenience store in Sulphur, Oklahoma as part of disaster recovery in a moderate-income tract after a tornado.

## Number and Amount of Qualified Investments

The following Community Development Investments Table sets forth the information and data used to evaluate the bank's level of CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date and qualifying donations.

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City Partial MSA	1	535	6	39	7	18.42	574	12.16	--	--
Oklahoma Non-MSA	5	1,870	20	2,276	25	81.58	4,146	87.84	--	--
Total	6	2,405	26	2,315	32	100.00	4,720	100.00	--	--

## Oklahoma City Partial MSA

The level of community development investments in this AA indicates adequate responsiveness to the needs of the AA. During the evaluation period, the bank had one investment totaling \$535,000 made in a prior period. The investment was part of a larger city bond, the proceeds of which were used for repairing infrastructure after a natural disaster. The bank made six donations totaling \$39,000 during the evaluation period. Donations were made to local economic development organizations and community services targeted towards LMI residents.

## Oklahoma Non-MSA

The level of community development investments in this AA indicates adequate responsiveness to the needs of the AA. During the evaluation period, the bank made three new CD investments and 23 donations totaling \$2.3 million. The bank also had five investments totaling \$1.9 million made in a prior period. Investments made during this evaluation period include three local school bonds to schools with majority LMI students.

## Extent to Which the Bank Provides Community Development Services

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

## Oklahoma City Partial MSA

The level of qualified CD services in this AA indicates adequate responsiveness to the needs of the AA. Three bank officers volunteer their time and serve in leadership positions in 10 different organizations. Bank officers serve in organizations that are involved in economic and small business development activities, community services to LMI families, and revitalization and stabilization. They provide technical expertise and financial assistance to these organizations and generally devote several hours each month to these organizations. Notable organizations served include the Norman Chamber of Commerce, Bethesda, Inc., and the Norman Rotary Club.

## Oklahoma Non-MSA

The level of qualified CD services in this AA indicates adequate responsiveness to the needs of the AA. 17 bank officers volunteer their time and serve in leadership positions in 35 different organizations. Bank officers serve in organizations that are involved in economic and small business development activities, affordable housing, community services to LMI families, and revitalization and stabilization.

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

They provide technical expertise and financial assistance to these organizations and generally devote several hours each month to these organizations. Notable organizations served include several local chambers of commerce, United Way, and the Salvation Army.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Oklahoma		
Oklahoma City Partial MSA	Full-scope	
Oklahoma Non-MSA	Full-scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank & Trust Co.	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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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

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### 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 30<sup>th</sup> 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.

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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total 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		
Oklahoma Non-MSA	196	25,214	87.11	6,018	--	--	--	12.96	16.33	11.40	59.37	48.98	57.68	27.67	34.69	30.82	--	--	--		
Partial OKC MSA	29	7,590	12.89	56,199	4.42	--	3.92	20.50	27.59	18.56	37.94	41.38	36.86	35.99	31.03	39.72	1.14	--	0.93		
<b>Total</b>	<b>225</b>	<b>32,804</b>	<b>100.00</b>	<b>62,217</b>	<b>3.84</b>	<b>--</b>	<b>3.54</b>	<b>19.52</b>	<b>17.78</b>	<b>17.87</b>	<b>40.74</b>	<b>48.00</b>	<b>38.87</b>	<b>34.91</b>	<b>34.22</b>	<b>38.86</b>	<b>1.00</b>	<b>--</b>	<b>0.84</b>		

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			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		
Oklahoma Non-MSA	83	13,480	85.57	2,816	--	--	--	12.96	14.46	11.01	59.37	54.22	58.24	27.67	31.33	30.54	--	--	--		
Partial OKC MSA	14	3,660	14.43	25,872	4.42	--	4.05	20.50	21.43	19.51	37.94	28.57	36.92	35.99	50.00	38.64	1.14	--	0.84		
<b>Total</b>	<b>97</b>	<b>17,140</b>	<b>100.00</b>	<b>28,688</b>	<b>3.84</b>	<b>--</b>	<b>3.66</b>	<b>19.52</b>	<b>15.46</b>	<b>18.68</b>	<b>40.74</b>	<b>50.52</b>	<b>39.02</b>	<b>34.91</b>	<b>34.02</b>	<b>37.85</b>	<b>1.00</b>	<b>--</b>	<b>0.76</b>		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 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 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	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	196	25,214	87.11	6,018	19.87	8.67	5.55	16.78	9.69	14.59	20.80	17.86	19.79	42.55	52.04	40.93	--	11.73	19.14		
Partial OKC MSA	29	7,590	12.89	56,199	22.25	3.45	7.11	17.87	10.34	16.32	20.06	13.79	17.75	39.81	24.14	31.73	--	48.28	27.09		
<b>Total</b>	<b>225</b>	<b>32,804</b>	<b>100.00</b>	<b>62,217</b>	<b>21.97</b>	<b>8.00</b>	<b>6.95</b>	<b>17.74</b>	<b>9.78</b>	<b>16.15</b>	<b>20.15</b>	<b>17.33</b>	<b>17.95</b>	<b>40.14</b>	<b>48.44</b>	<b>32.62</b>	<b>--</b>	<b>16.44</b>	<b>26.32</b>		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 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																			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		
Oklahoma Non-MSA	83	13,480	85.57	2,816	19.87	2.41	3.98	16.78	9.64	13.60	20.80	13.25	19.57	42.55	57.83	41.48	--	16.87	21.38		
Partial OKC MSA	14	3,660	14.43	25,872	22.25	--	6.00	17.87	--	16.18	20.06	--	18.31	39.81	42.86	31.30	--	57.14	28.21		
<b>Total</b>	<b>97</b>	<b>17,140</b>	<b>100.00</b>	<b>28,688</b>	<b>21.97</b>	<b>2.06</b>	<b>5.80</b>	<b>17.74</b>	<b>8.25</b>	<b>15.93</b>	<b>20.15</b>	<b>11.34</b>	<b>18.43</b>	<b>40.14</b>	<b>55.67</b>	<b>32.30</b>	<b>--</b>	<b>22.68</b>	<b>27.54</b>		

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	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	20	1,425	50.00	4,907	--	--	--	16.21	25.00	10.07	54.95	40.00	55.61	28.83	35.00	34.32	--	--	--		
Partial OKC MSA	20	2,106	50.00	49,452	5.81	5.00	4.75	25.23	25.00	21.57	33.47	35.00	31.36	32.44	35.00	40.29	3.06	--	2.03		
<b>Total</b>	<b>40</b>	<b>3,531</b>	<b>100.00</b>	<b>54,359</b>	<b>5.35</b>	<b>2.50</b>	<b>4.32</b>	<b>24.53</b>	<b>25.00</b>	<b>20.53</b>	<b>35.15</b>	<b>37.50</b>	<b>33.55</b>	<b>32.16</b>	<b>35.00</b>	<b>39.75</b>	<b>2.82</b>	<b>--</b>	<b>1.85</b>		

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024		
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		
Oklahoma Non-MSA	20	929	50.00	--	--	--	--	14.92	20.00	--	54.34	55.00	--	30.74	25.00	--	--	--	--		
Partial OKC MSA	20	6,645	50.00	--	5.70	--	--	24.14	20.00	--	32.83	45.00	--	34.41	35.00	--	2.92	--	--		
<b>Total</b>	<b>40</b>	<b>7,574</b>	<b>100.00</b>	<b>--</b>	<b>5.21</b>	<b>--</b>	<b>--</b>	<b>23.36</b>	<b>20.00</b>	<b>--</b>	<b>34.65</b>	<b>50.00</b>	<b>--</b>	<b>34.10</b>	<b>30.00</b>	<b>--</b>	<b>2.67</b>	<b>--</b>	<b>--</b>		

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Oklahoma Non-MSA	20	1,425	50.00	4,907	77.20	75.00	60.10	9.97	25.00	12.83	--
Partial OKC MSA	20	2,106	50.00	49,452	83.70	80.00	53.19	8.06	20.00	8.25	--
<b>Total</b>	<b>40</b>	<b>3,531</b>	<b>100.00</b>	<b>54,359</b>	<b>83.16</b>	<b>77.50</b>	<b>53.81</b>	<b>8.22</b>	<b>22.50</b>	<b>8.63</b>	<b>--</b>

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
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
Oklahoma Non-MSA	20	929	0.00	--	76.65	85.00	--	9.82	15.00	13.53	--
Partial OKC MSA	20	6,646	0.00	--	82.59	80.00	--	7.97	20.00	9.44	--
<b>Total</b>	<b>40</b>	<b>7,574</b>	<b>0.00</b>	<b>--</b>	<b>82.09</b>	<b>82.50</b>	<b>--</b>	<b>8.13</b>	<b>17.50</b>	<b>9.78</b>	<b>--</b>

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