



PUBLIC DISCLOSURE

July 6, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Shamrock Bank, National Association
Charter Number 12529

101 N. Main Street
Coalgate, Oklahoma 74538

Office of the Comptroller of the Currency

8282 South Memorial Drive
Suite 300
Tulsa, Oklahoma 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: Shamrock Bank, National Association (SBNA) is rated **Satisfactory**. The lending test is rated **Satisfactory**. The lending test rating is based on our review of two assessment areas (AA) in the state of Oklahoma. These include Southern Oklahoma (full-scope review) and Oklahoma County (limited-scope review). For additional information regarding these reviews please refer to the "Scope of the Evaluation" section of this report. The major factors that support this overall rating include:

- The loan-to-deposit (LTD) ratio is *reasonable* considering SBNA's size, financial condition, and credit needs of the AAs.
- A *substantial majority* of SBNA's first lien residential real estate loans, consumer automobile purchase loans, and commercial real estate (CRE) loans originated during the evaluation period are inside of SBNA's AAs.
- SBNA's distribution of first lien residential real estate loans and consumer automobile purchase loans reflects a *reasonable distribution* of loan originations among borrowers of different income levels and businesses with different levels of gross annual revenues.
- SBNA's geographic distribution of first lien residential real estate loans and consumer automobile purchase loans reflects a *reasonable distribution* of loans throughout the AAs.
- Our limited-scope review of SBNA's CRE lending activities within the Oklahoma County AA disclosed performance that is *consistent with* lending activities in the Southern Oklahoma AA.

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	27	90.0	3	10.0	30	3,077	87.4	443	12.6	3,520
CRE	27	90.0	3	10.0	30	15,543	89.0	1,915	11.0	17,458
Consumer - Automobile	29	96.7	1	3.3	30	451	96.8	15	3.2	466
Total	83	92.2	7	7.8	90	19,071	88.9	2,373	11.1	21,444

Source: 01/02/2018-12/31/2020 Loan Sample

Description of Institution

SBNA is a \$379 million national bank headquartered in Coalgate, Oklahoma, and a subsidiary of Shamrock Bancshares, Inc., a single bank holding company. SBNA's AAs comprise all of Oklahoma County (Oklahoma County AA) and six counties in Southern Oklahoma (Southern Oklahoma AA). Within Southern Oklahoma, SBNA provides banking services inside the AA with a main banking facility at 101 N. Main Street, Coalgate, Oklahoma, and six full-service branch locations, including automated teller machines throughout the AAs. The main bank in Coalgate is located in a middle-income census tract (CT), as are the branches in Bryan, Caddo, Coal, and Kiowa counties.

The branch in Pushmataha County is in a moderate-income CT, and the branch in Jackson County is located in an upper-income CT. There are no low-income CTs within the Southern Oklahoma AA. Within Oklahoma County, SBNA provides banking services inside the AA with a full-service branch facility in northern Oklahoma City.

Despite strong competition for banking services, to meet the credit and deposit needs of the AAs SBNA offers a diverse line of loan and deposit products and services during reasonable hours Monday through Saturday. SBNA 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. SBNA's strategic lending focus remains consumer real estate purchase, consumer installment, agriculture, general commercial, and CRE. The following table describes the composition of SBNA's loan portfolio as of December 31, 2020, which represents 56 percent of total assets. Bank management does not anticipate significant changes to the composition of the loan portfolio in the near future.

Loan Distribution Shamrock Bank, N.A. as of December 31, 2020		
Loan Category	\$ (000)	% of Gross Loans
Consumer Loans	13,290	6.3%
Commercial Loans	20,719	9.8%
Construction	27,948	13.2%
Residential Real Estate Loans	54,045	25.5%
Commercial Real Estate Loans	55,568	26.3%
Farmland/Agriculture Loans	39,718	18.7%
Other Loans	375	00.2%
Total	211,663	100.00%

Source: 12/31/2020 Call Report Data

Based on the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Market Share Report, SBNA's presence within both AAs is low, as they have only nine percent of the deposit market share within the Southern Oklahoma AA, and less than one percent of the deposit market share within the Oklahoma County AA. Competition for deposits within each AA is strong and highly competitive, and many of the competitors within the Oklahoma County AA are large or midsize banks with significantly greater branch and marketing resources than SBNA. One competitor within the Southern Oklahoma AA is more than three times the size of SBNA. A CRA Performance Evaluation (PE) was last prepared May 7, 2018 and a "Satisfactory" rating was assigned. There are no known legal, financial, or other factors impeding SBNA's ability to meet the credit needs of its AAs.

The OCC contacted two community leaders within the AAs to get a better understanding of the general community credit and development needs and discuss local economic conditions. One contact stated that rental housing and utility payment assistance for low- and moderate-income residents are critical as many families remain adversely affected by COVID-19. The contact also stated that financial education such as budgeting and credit counseling is needed. Other community development needs within the AA continue to be affordable housing. The other contact emphasized the need for banks to not only provide flexible loan programs for start-up businesses, but also increase partnerships with the Oklahoma Small Business Development Center for small business technical assistance.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Southern Oklahoma AA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	25.6	64.1	10.3	0.0
Population by Geography	139,800	0.0	24.0	66.8	9.2	0.0
Housing Units by Geography	65,591	0.0	24.7	66.1	9.2	0.0
Owner-Occupied Units by Geography	35,674	0.0	19.2	69.3	11.5	0.0
Occupied Rental Units by Geography	17,614	0.0	35.5	58.6	6.0	0.0
Vacant Units by Geography	12,303	0.0	25.4	67.7	6.9	0.0
Businesses by Geography	8,403	0.0	28.7	62.7	8.6	0.0
Farms by Geography	723	0.0	12.0	71.5	16.5	0.0
Family Distribution by Income Level	35,157	23.5	18.6	19.9	38.0	0.0
Household Distribution by Income Level	53,288	27.0	16.6	18.0	38.5	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$84,600
			Median Gross Rent			\$638
			Families Below Poverty Level			15.2%
<i>Source: 2015 ACS and 2020 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 County AA 2020						
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	86,009	6.2	25.2	29.8	34.2	4.5
Farms by Geography	1,932	5.7	23.6	29.5	39.8	1.5
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 2020 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>						

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated SBNA using the Small Bank standards for assessing performance. Within the Oklahoma County AA, SBNA's primary loan product is CRE; therefore, we assessed lending performance under the CRA using a sample of 30 CRE loans originated from the Oklahoma City branch location from January 2, 2018 through December 31, 2020. Within the Southern Oklahoma AA, SBNA's primary loan products include first lien residential real estate loans and consumer loans for automobile purchase. We assessed lending performance under the CRA using a sample of 30 real estate loans and 30 consumer auto loans originated from January 2, 2018 through December 31, 2020. SBNA is not subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA), and the comprehensive sample is representative of SBNA's business strategy since the last CRA PE.

Selection of Areas for Full-Scope Review

SBNA's AAs consist of Oklahoma County (Oklahoma County AA) and six counties in Southern Oklahoma (Southern Oklahoma AA). The AAs meet the requirements of the regulation and do not arbitrarily exclude low- and moderate-income (LMI) geographies. The Southern Oklahoma AA was designated for a full-scope review as it represents where the bank currently has a substantial share of its deposit and loan business. For additional information regarding these AAs, please refer to Appendix A of this evaluation report.

Ratings

Within the Oklahoma County AA, SBNA only has one branch location and is primarily a CRE lender; therefore, we placed more weight on the bank's lending performance with this product. Within the Southern Oklahoma AA, SBNA is primarily a first lien residential real estate and consumer automobile purchase lender; therefore, we place more weight on the bank's lending performance with these products.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Bureau of Consumer Financial Protection, as applicable.

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

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Loan-to-Deposit Ratio

SBNA has a *reasonable* LTD ratio relative to its financial condition, local banking competition, and credit needs of the AAs. Since the previous CRA PE, SBNA's quarterly average LTD within the Southern Oklahoma AA was 74 percent compared to a 73 percent aggregate average by eight competing banks during the same period. The aggregate quarterly average LTD ratio among three competing banks within the Oklahoma County AA was 92 percent. The significant difference is primarily due to two factors. First, SBNA did not establish their Oklahoma City branch until February 2020. Second, the competitors for loans within the Oklahoma County AA collectively had many more branch and main bank resources available during the evaluation period.

Southern Oklahoma AA

Institution	Total Assets (as of December 31, 2020)	Average LTD Ratio
SBNA	\$379 Million	74%
First Texoma National Bank	\$210 Million	88%
Vision Bank, National Association	\$827 Million	84%
Ameristate Bank	\$314 Million	84%
Security First National Bank of Hugo	\$127 Million	91%
First State Bank	\$110 Million	33%
Spiro State Bank	\$57 Million	27%
Farmers Bank, The	\$77 Million	83%
Bank of Commerce	\$358 Million	90%

Source: December 31, 2020 Consolidated Reports of Condition and Income; Uniform Bank Performance Report

Oklahoma County AA

Institution	Total Assets (as of December 31, 2020)	Average LTD Ratio
SBNA	\$379 Million	74%
Valliance Bank	\$564 Million	99%
Quail Creek Bank, National Association	\$767 Million	82%
Legacy Bank	\$793 Million	96%

Source: December 31, 2020 Consolidated Reports of Condition and Income; Uniform Bank Performance Report

Distribution of Loans by Income Level of the Geography

Lending patterns during the evaluation period indicate a *reasonable distribution* of loans throughout SBNA's AAs, including CTs designated as low-income and moderate-income. There are no low-income CTs within the Southern Oklahoma AA. The geographic distribution of loans strongly represents the income demographics of each CT in which the residents and businesses function. Please refer to Tables O, Q, and U in Appendix D for a more specific identification of residential, CRE, and consumer loan distribution activity.

Distribution of Loans by Income Level of the Borrower

Lending patterns during the evaluation period indicate a *reasonable distribution* of loan originations throughout SBNA's AAs given the product lines offered by the bank, and reasonably represent the income demographics of residents and businesses within each CT. Within the Southern Oklahoma AA is a large regional hospital in Altus, Oklahoma which draws a large number of medical professionals to the area. The low percentage of first lien, residential mortgage loans originated to low-income borrowers (relative to the percentage of families within the AA), is primarily the result of the general inability of low-income borrowers to afford reasonable housing and meet SBNA's reasonable credit standards, consistent with safe and sound lending. According to the 2020 United States Census data (Table A – “Description of Institution” section), within the Southern Oklahoma AA a low-income resident earned less than \$25,746. Additionally, 15 percent of the families within the AA are below the poverty level and 27 percent of the housing units within the AA are rental properties. Please refer to Tables P, R, and V in Appendix D for a more specific identification of residential, CRE, and consumer loan distribution activity.

Responses to Complaints

SBNA did not receive any consumer complaints regarding their performance under the CRA during the evaluation period.

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 metropolitan statistical areas (MSAs) and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

Time Period Reviewed:	(01/02/2018 to 12/31/20)	
Bank Products Reviewed:	Home mortgage loans Small business / CRE loans Consumer loans – Auto Purchase	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Areas	Type of Exam	Other Information
• Southern Oklahoma AA	Full-Scope	
• Oklahoma County AA	Limited Scope	

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.

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

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

Table 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.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2018-2020	
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	\$	% of Total	% 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
Southern Oklahoma AA	--	--	--	2,374	0.0	0/0	0.0	19.2	17.0	17.5	69.3	70.0	68.0	11.5	13.0	14.5	0.0	0.0
Total	--	--	--	2,374	0.0	0.0	0.0	19.2	17.0	17.5	69.3	70.0	68.0	11.5	13.0	14.5	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2018-2020	
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area	#	\$	% of Tot	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Southern Oklahoma AA	--	--	--	2,310	23.5	--	3.5	18.6	--	12.6	19.9	--	17.2	38.0	--	34.1	0.0	--
Total	--	--	--	2,310	23.5	--	3.5	18.6	--	12.6	19.9	--	17.2	38.0	--	34.1	0.0	--

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data., "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2018-2020		
Assessment Area: Oklahoma County	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CRE	--	--	17,990	6.2	10.0	6.5	25.2	20.0	23.5	29.8	37.0	37.1	34.2	33.0	36.2	4.5	--	3.6
Total	--	--	17,990	6.2	10.0	6.5	25.2	20.0	23.5	29.8	37.0	37.1	34.2	33.0	36.2	4.5	--	3.6

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-2020	
Assessment Area: Oklahoma County	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank	Aggregate	% Businesses	% Bank	% Businesses	% Bank		
CRE	--	--	--	17,990	87.3	70.0	44.5	4.3	30.0	8.4	--		
Total	--	--	--	17,990	87.3	70.0	44.5	4.3	30.0	8.4	--		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2018-20	
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	
Southern Oklahoma AA	--	--	--	0.0	0.0	24.6	27.0	65.7	66.0	9.7	7.0	0.0	0.0	
Total	--	--	--	0.0	0.0	24.6	27.0	65.7	66.0	9.7	7.0	0.0	0/0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 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													2018-20	
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	
Southern Oklahoma AA	--	--	--	27.0	16.0	16.6	37.0	18.0	17.0	38.5	30.0	0.0	0.0	
Total	--	--	--	27.0	16.0	16.6	37.0	18.0	17.0	38.5	30.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%*