PUBLIC DISCLOSURE

February 2, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

INTRUST Bank, National Association
Charter Number: 2782

105 N. Main
Wichita, KS 67202

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510
Wichita, KS 67226

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

Contents

Overall CRA Rating

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

The following table indicates the performance level of INTRUST Bank, National Association (INTRUST) with respect to the Lending, Investment, and Service Tests:

	INTRUST Bank, National Association Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on satisfactory performance in the Wichita assessment area (AA) and the State of Kansas. The Wichita AA and the State of Kansas received the greatest weight. The bank originated a substantial majority of loans within its AAs.

- The Investment Test rating is based on performance across all rating areas, however, the state rating area of Kansas received greater weight. The bank has a significant level of qualified community development (CD) investments and grants across the rating area, including broader statewide areas.

- The Service Test rating is based on the performance across all rating areas, however, the state rating area of Kansas received greater weight. Service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The bank is a leader in providing CD services.

Retail Banking Services

- The bank's retail banking services are accessible to geographies and individuals of different income levels in the institution's AAs.

Broader Statewide or Regional Area

- The bank has a significant level of qualified CD lending in the broader statewide area, most notably in Kansas.

Lending in Assessment Area

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

The bank originated and purchased 84.4 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.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	1,390	87.48	199	12.52	1,589	237,846	74.03	83,416	25.97	321,262
Small Business	1,570	82.81	326	17.19	1,896	382,164	77.65	109,978	22.35	492,142
Small Farm	94	70.15	40	29.85	134	13,298	71.18	5,385	28.82	18,683
Total	**3,054**	**84.39**	**565**	**15.61**	**3,619**	**633,308**	**76.11**	**198,779**	**23.89**	**832,087**
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*										

Description of Institution

INTRUST is a $7.1 billion financial institution headquartered in Wichita, Kansas. INTRUST operates one subsidiary, INTRUST Community Development Corporation, located in Wichita, Kansas. The bank is wholly owned by INTRUST Financial Corporation, a one-bank holding company located in Wichita, Kansas.

INTRUST is a multistate institution comprising 40 branches and 117 automated teller machines (ATM). INTRUST has 33 branches and 110 ATMs in Kansas, six branches and six ATMs in Oklahoma, and one branch and one ATM in Arkansas. The bank opened one additional branch in Oklahoma in the last six months of the evaluation period, but examiners did not consider it in the analysis given the short tenure during the evaluation period. INTRUST participates in the Allpoint ATM network to provide more surcharge-free ATM access to customers, including an additional 253 Allpoint ATMs within its AA—159 in Kansas, 84 in Oklahoma, and 10 in Arkansas. The bank primarily serves 12 counties within Kansas, Oklahoma, and Arkansas.

INTRUST offers a broad range of banking services, including trust, credit, and deposit services to commercial enterprises and consumers of all income levels and sizes. As of December 31, 2024, net loans and leases represented 57 percent of total assets. The loan portfolio had the following credit composition: 54 percent real estate loans (62 percent non-farm non-residential, 11 percent 1-4 family residential, 12 percent multifamily residential, 14 percent construction and development, and one percent farmland), 33 percent commercial and industrial loans, five percent agricultural loans, five percent consumer loans, and four percent other loans. The bank is a Small Business Administration (SBA) Preferred Lender Partner, participating in SBA 504 and SBA 7(a) programs. Among the 7(a) offerings are Express, Export Express, Export Working Capital, CapLines, and International Trade lending. The bank offers SBA 504 loans for larger, long-term purchases or renovations. Tier 1 capital totaled $723.5 million as of December 31, 2024.

The bank is not subject to any pending litigation or other factors impeding its ability to meet the credit needs in its AAs. The bank received an Outstanding rating in its previous Community Reinvestment Act evaluation dated January 17, 2023.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners evaluated INTRUST's CRA performance under the Large Bank examination procedures including Lending, Investment, and Service Tests with an evaluation period from January 1, 2022, through December 31, 2024. Examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA. Lending activity was evaluated against the 2020 American Community Survey (ACS) census data and the 2020 U.S. Census Demographic information.

To perform a meaningful analysis of lending performance, a minimum of 20 loans were needed in a loan product during the evaluation period. Refer to the Scope of Evaluation section under each Multistate Metropolitan Statistical Area (MMSA) and State Rating section for details on loan products that did not have a sufficient volume to perform a quantitative analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) 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), 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 section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings and, where applicable, multistate ratings.

Examiners placed the greatest weight on the bank's performance in the state of Kansas, where the bank's headquarters is located. The state of Kansas also had: the greatest number of AAs, with five in the state; the highest number of branches, with 33 full-service branches out of 40; 94.3 percent of bank loans; and 93.1 percent of bank deposits.

The MMSA 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 combination of conclusions in those AAs. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Kansas

CRA rating for the State of Kansas[1]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The distribution of loans in low- and moderate-income (LMI) geographies is good.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is good.
- The bank made a relatively high level of CD loans.
- The bank had a significant level of qualified investments.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank was a leader in providing CD services.

Description of Institution's Operations in Kansas

INTRUST delineated five AAs in Kansas. The Kansas AAs include the Wichita AA (Sedgwick, Butler, and Harvey Counties) which is part of the larger Wichita, KS MSA (#48620); the Manhattan AA (Geary and Riley Counties) which is part of the larger Manhattan, KS MSA (#31740); the Kansas City AA (Johnson County) which is part of the larger Kansas City, MO-KS MSA (#28140); the Lawrence AA (Douglas County) which is part of the Lawrence, KS MSA (#29940); and the Topeka AA (Shawnee County) which is part of the larger Topeka, KS MSA (#45820).

As of June 30, 2024, the bank had approximately $6.1 billion in deposits in Kansas, representing 93.1 percent of INTRUST's total deposits. The bank operated 33 branches in Kansas, representing 82.5 percent of the bank's total branches. In Kansas, the bank originated and purchased approximately $650.3 million in reportable loans, which was 92.3 percent of the total number of reportable loans that INTRUST originated and purchased during the evaluation period. The primary product types in Kansas are home mortgage and small business loans.

[1] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Wichita AA

INTRUST operated 23 bank branches and 97 ATMs (including 16 multi-service ATMs) in the Wichita AA. As of June 30, 2024, deposits within the AA totaled $5.1 billion, or 77.8 percent of the bank's total deposits. During the evaluation period, the bank made 2,368 loans totaling $483.6 million within the AA, or about 81.5 percent of the total number of rating area loans by volume.

Assessment Area(s) - Wichita AA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	161	4.97	27.33	40.99	25.47	1.24
Population by Geography	625,228	3.20	24.06	41.77	30.41	0.56
Housing Units by Geography	262,547	3.95	26.97	41.81	26.32	0.95
Owner-Occupied Housing by Geography	152,183	1.69	18.32	45.95	33.87	0.17
Occupied Rental Units by Geography	85,366	6.61	38.75	36.93	15.68	2.02
Vacant Units by Geography	24,998	8.56	39.41	33.31	16.67	2.06
Businesses by Geography	19,402	2.44	22.45	37.11	35.75	2.25
Farms by Geography	924	0.76	13.10	46.54	38.64	0.97
Family Distribution by Income Level	153,420	19.37	18.49	21.58	40.55	0.00
Household Distribution by Income Level	237,549	23.00	17.38	17.94	41.68	0.00
Unemployment rate (%)	4.95	10.66	7.01	4.44	3.41	6.36
Households Below Poverty Level (%)	12.77	36.66	20.43	10.59	5.06	41.44
Median Family Income (48620 - Wichita, KS MSA)		$74,120			**Median Housing Value**	$130,100
Median Family Income (48620 - Wichita, KS MSA) for 2024		$91,200			**Median Gross Rent**	$846
					Families Below Poverty Level	8.70

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The Wichita AA consists of 161 census tracts among the three counties. During the evaluation period, the AA had eight low-, 44 moderate-, 66 middle-, and 41 upper-income census tracts. The table reflects that LMI tracts total 32.3 percent of the AA. According to the 2020 U.S. Census and 2024 D&B Data, the population of the AA is 625,228 and the median family income is $91,200. The income distribution for families within the AA is 19.4 percent low-income, 18.5 percent moderate-income, 21.6 percent middle-income, and 40.6 percent upper-income.

Demographic data as of 2024 reflects that among the 237,549 households within the AA, approximately 30 percent receive social security, 21 percent are retired, and 13 percent are below the poverty level. Approximately 15 percent of the population are over the age 65, while 26 percent of the population consists of civilians not in the work force. The median housing value is $130,100 and 58 percent of the housing units are owner-occupied. The demographic data also reflects a relatively low percentage of home ownership in low-income geographies, with 24.8 percent of 10,371 housing units in low-income census tracts being owner-occupied. Rental housing units represent a significant level of units in LMI census tracts at 54.4 percent and 46.7 percent, respectively.

Economic Data

According to the October 2025 Moody's Analytics report, Wichita's economy is making little headway, and the business cycle status is at risk. The labor market has been subdued in 2025, leaving total payrolls up only slightly on a year-ago basis. The low costs of living and doing business and the large aerospace industry are strengths in the Wichita economy. The report further notes that below-average income and educational attainment, overreliance on manufacturing, and the aerospace industry's exposure to volatility in trade policy are weaknesses.

The largest employers in the Wichita economy are Spirit AeroSystems Inc., Textron Aviation, McConnell Air Force Base, and Wichita State University. The unemployment rate was 3.9 percent in 2024. Unemployment dropped to 3.1 percent in 2022 from 4.4 percent in 2021, after a high of 8.1 percent amid the COVID-19 pandemic. Population growth was stagnant at an average growth rate of about 0.9 percent during the evaluation period. According to Moody's Analytics, from 2022 to 2024, median household income increased from $65,200 to $71,800, and personal income growth averaged 2.9 percent per year.

Housing

Housing affordability ratios in the Wichita AA indicated generally reduced affordability during the assessment period while holding more affordable conditions compared to the State of Kansas. Median housing prices increased significantly from 2022 through 2024. The AA had 262,547 total housing units, 237,549 were occupied. Of the occupied housing units, 64.1 percent were owner-occupied and 35.9 percent were rental units. Median gross rent levels for all three counties in the AA were lower than those of the State of Kansas and the U.S., overall.

Community Contacts

Our review utilized three existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Wichita AA to address those needs. These contacts comprise three economic development organizations, all serving Sedgwick County and one also serving Harvey County. One community contact communicated that there is a need for housing within the AA, and noted there is a supply shortage in housing with properties selling as quickly as they are put on the market. Business expansion from both existing and new businesses in the local area also present some lending opportunities. The local economy has felt the impact of disruptions to the aerospace industry, as Spirit announced layoffs in 2024. Boeing has made an offer to buy Spirit Aerosystems, which may alleviate the stress from the layoffs. All contacts noted that local financial institutions are receptive to community needs and do a good job in meeting these credit needs. One contact indicated that there is an opportunity for local financial institutions to support and invest in local education for perspective and future business owners.

Manhattan AA

The bank operated three branches and six ATMs in the Manhattan AA. As of June 30, 2024, deposits within the AA totaled $155.7 million, or 2.4 percent of the bank's total deposits. During the evaluation period, the bank made 139 home mortgage and small business loans totaling $24.2 million, or 4.8 percent of the total number of rating area loans by volume.

Assessment Area(s) - Manhattan AA						
						2022 - 2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	28	10.71	21.43	35.71	25.00	7.14
Population by Geography	108,698	8.33	28.04	34.79	26.12	2.72
Housing Units by Geography	46,506	7.90	23.94	38.02	28.89	1.25
Owner-Occupied Housing by Geography	17,071	4.00	17.32	35.89	42.53	0.27
Occupied Rental Units by Geography	22,673	9.23	30.15	38.76	19.74	2.12
Vacant Units by Geography	6,762	13.34	19.82	40.93	25.11	0.80
Businesses by Geography	2,636	10.66	13.77	45.75	28.98	0.83
Farms by Geography	167	2.40	22.75	30.54	43.71	0.60
Family Distribution by Income Level	23,358	23.43	17.84	21.05	37.68	0.00
Household Distribution by Income Level	39,744	24.03	17.64	20.37	37.96	0.00
Unemployment rate (%)	3.97	7.81	4.15	3.40	2.90	8.83
Households Below Poverty Level (%)	18.46	35.87	21.63	18.32	10.49	49.72
Median Family Income (31740 - Manhattan, KS MSA)		$70,357			**Median Housing Value**	$151,500
Median Family Income (31740 - Manhattan, KS MSA) for 2024		$85,700			**Median Gross Rent**	$900
					Families Below Poverty Level	12.06

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The Manhattan AA consists of 28 census tracts between Riley and Geary Counties in Central Kansas. Within the MSA is the city of Manhattan which includes Kansas State University (KSU), Junction City, and the adjacent Fort Riley Military Base. During the evaluation period the AA had three low-, six moderate-, ten middle-, and seven upper-income census tracts. The AA also had two census tracts that were NA for income level designation. The table reflects that LMI tracts total 32.1 percent of the AA. According to the 2020 U.S. Census and 2024 D&B Data, the population of the AA is 108,698 and the median family income is $70,357. The income distribution for families within the AA is 23.4 percent low-income, 17.8 percent moderate-income, 21.1 percent middle-income, and 37.7 percent upper income.

Demographic data as of 2024 reflects that among the 39,744 households within the AA, 18 percent receive social security, 17 percent are retired, and 18 percent are below the poverty level. Approximately nine percent of the population are over the age 65, while 22 percent of the population consists of civilians not in the work force. The median housing value is $151,500 and 36.7 percent of the housing units are owner-occupied. Rental housing units represent a significant level of housing within the AA at 48.8 percent of the total housing units.

Economic Data

The October 2025 Moody's Analytics report for Manhattan shows the business cycle status as being at risk. The risk susceptibility stems from lower enrollment at Kansas State University (KSU) and weaker wage growth increasing out-migration of graduates. Despite the short-term forecast, Moody's presents a more optimistic long-term outlook for Manhattan's economy stemming the stabilizing presence of Fort Riley and KSU, an abundance of skilled labor, and the low costs of living and doing business are strengths for Manhattan's economy.

The largest employers in Manhattan are Fort Riley and KSU. The unemployment rate increased from 3 percent in 2021 to 3.3 percent in 2024. Population growth was static during the evaluation period with an average growth rate of approximately 0.2 percent. According to Moody's Analytics, between 2022 and 2024, the median household income increased from $59,900 to $70,300, and personal income growth averaged 2.8 percent per year.

Housing

Housing affordability in the Manhattan AA varies between counties. The Census' five-year (2019-2023) ACS statistics estimates an affordability index for Riley and Geary Counties at 141 and 190, respectively, compared to the State of Kansas at 195 times. The affordability index measures a household's ability to qualify for a conventional mortgage relative to income. The index assumes a 30-year mortgage on a median valued home assuming a 20 percent down payment, qualifying median household income of 25 percent of the expected monthly payment (excluding PMI and property taxes), and 5-year average of 30-year mortgage interest rates. An index value of 100 indicates a household has exactly enough income to qualify for a 30-year mortgage and an index value of 200 indicates a household's income is twice the amount needed to qualify for 80% of the value of the median-priced home. Median gross rent levels for the AA were higher than the State of Kansas, but below the national level.

Community Contacts

The OCC utilized two existing community contacts to assess the credit needs of the community, and opportunities for financial institutions in the Manhattan AA to address those needs. Both contacts worked in housing development organizations within their respective communities. The contacts communicated that there is a need for residential housing lending. The contacts noted that the local housing economy is becoming untenable for lower- and moderate-income households.

Scope of Evaluation in Kansas

The Wichita and Manhattan AAs were selected for full-scope reviews with the Topeka, Lawrence, and Kansas City AAs receiving limited-scope reviews. Examiners placed the greatest weight on the Wichita AA as the bank headquarters, 23 of the 33 Kansas branches, 83.6 percent of Kansas deposits, and 81.5 percent of the bank's Kansas loans are located there.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita and Manhattan AAs was good.

Lending Activity

Lending levels reflected adequate responsiveness to AAs credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Kansas City AA	97	168	3	1	0	269	9.26	7.17
Lawrence AA	35	49	2	2	0	88	3.03	5.01
Manhattan AA	54	85	4	0	0	143	4.92	2.56
Topeka AA	8	28	0	1	0	37	1.27	1.72
Wichita AA	1,108	1,160	83	17	0	2,368	81.51	83.55
Total	**1,302**	**1,490**	**92**	**21**	**0**	**2,905**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Kansas City AA	39,595	45,669	636	1,600	0	87,500	13.45	7.17
Lawrence AA	8,524	15,128	900	14,686	0	39,238	6.03	5.01
Manhattan AA	7,627	16,534	878	0	0	25,039	3.85	2.56
Topeka AA	2,329	11,462	0	1,208	0	14,999	2.31	1.72
Wichita AA	164,381	269,706	10,414	39,111	0	483,612	74.36	83.55
Total	**222,457**	**358,499**	**12,828**	**56,605**	**0**	**650,388**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

Wichita AA

As of June 30, 2024, INTRUST ranked first out of 41 depository institutions with a deposit market share of 23.9 percent. For home mortgage loans in 2024, the bank's market share was 2.1 percent ranking INTRUST 11th out of 337 lenders. The top three lenders were PennyMac Loan Services, LLC with a 5.4 percent market share, Meritrust Federal Credit Union with a 5.1 percent market share, and Credit Union of America with a 5 percent market share. For small loans to businesses in 2023, INTRUST's market share of 3.5 percent ranked eighth out of 103 lenders. The top three lenders were American Express National Bank with a 20.1 percent market share, JP Morgan Chase Bank, NA with a 15.3 percent market share, and Capital One, N.A. with a 9.1 percent market share.

Manhattan AA

As of June 30, 2024, INTRUST ranked seventh out of 18 depository institutions with a deposit market share of 4.7 percent. For home mortgage loans in 2024, the bank's market share was 0.8 percent ranking INTRUST 28th out of 176 lenders. The top three lenders were PennyMac Loan Services, LLC with a 9.3 percent market share, Mortgage Research Center with an 8.5 percent market share and, 21st Mortgage with a 5.7 percent market share. For small loans to businesses in 2023, INTRUST's market share of 3.2 percent ranked eighth out of 43 lenders. The top three lenders were JP Morgan Chase Bank, NA with a 21.7 percent market share, American Express National Bank with a 20.3 percent market share, and Capital One, N.A. with a 13.7 percent market share. Market share information for mortgage loans shows INTRUST operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Wichita AA

The percentage of home mortgage loans in low-income tracts was near the percentage of owner-occupied housing units and equal to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income tracts was below both the percentage of owner-occupied housing units and the aggregate distribution of loans. The bank faces significant competition for home mortgage loans in the AA competing against mortgage companies and credit unions with the top competitors having 37 percent of the market share. Additionally, rental units and vacant units had a significant impact on the bank's opportunities to lend. Rental units comprised 6.6 percent of housing in low-income tracts and 38.8 percent in moderate-income tracts. Vacant units in moderate-income tracts was significant at 39.4 percent, along with 8.6 percent in low-income tracts. The AA was made up of less than 5 percent low-income tracts and 27.3 percent moderate-income tracts limiting lending opportunities in LMI tracts.

Manhattan AA

The percentage of home mortgage loans to borrowers in low-income tracts significantly exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans. Home mortgages loans in moderate-income tracts were significantly below both the percentage of owner-occupied housing units and the aggregate distribution of loans. The AA had strong market competition. Only 17.3 percent of housing units in moderate-income tracts were owner-occupied with rental units representing 30.2 percent of housing units. Vacant units represented 19.8 percent of housing units in moderate-income tracts.

Small Loans to Businesses

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

Wichita AA

The percentage of small loans to businesses exceeded both the percentage of businesses in and the aggregate distribution of loans in both LMI tracts.

Manhattan AA

The percentage of small loans to businesses significantly exceeded the percentage of businesses and the aggregate distribution of loans in low-income tracts. The percentage of loans to small businesses was below both the percentage of businesses and the aggregate distribution of loans in moderate-income tracts; however, only 13.8 percent of small businesses were located in moderate-income tracts and market competition was strong.

Small Loans to Farms

Refer to Table 11 in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Wichita AA

The bank originated no small loans to farms in LMI tracts. Only 0.8 percent of farms were located in low-income tracts and there was no aggregate lending in low-income tracts. Only 13.1 percent of farms were located in moderate-income tracts with aggregate lending at 3.4 percent presenting less opportunity to lend. Competition in the AA was strong with much of the AA comprised of urban and suburban development.

Manhattan AA

The bank originated an insufficient number of small loans to farms to perform a meaningful analysis.

Lending Gap Analysis

Examiners analyzed INTRUST's lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in the AAs. Examiners focused on clusters of LMI census tracts with no lending in the AAs and evaluated those clusters to determine if demographic information or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Wichita AA

The percentage of home loans to low-income borrowers was very near to the aggregate but significantly below the demographic. The bank exceeded both the demographic and the aggregate in lending to moderate-income borrowers. With the median house sales price for 2024 at $225 thousand, sales prices exceeded the affordability for low-income borrowers.

Manhattan AA

The percentage of home loans was significantly below both the demographic and the aggregate for both LMI borrowers. The overall median sales price for homes affects the affordability for both LMI borrowers. Prices exceeded the affordability for low-income borrowers and was near to the affordability of moderate-income borrowers with sales prices steadily climbing year-over-year for the evaluation period.

Small Loans to Businesses

Refer to Table 10 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Wichita AA

The percentage of loans to small businesses with revenues of $1 million or less was significantly below the percentage of businesses with gross annual revenues of $1 million or less and below the aggregate distribution of small loans to businesses.

Manhattan AA

The percentage of loans to small businesses with revenues of $1 million or less was near the percentage of businesses with gross annual revenues of $1 million or less and significantly exceeded the aggregate distribution of small loans to businesses.

Small Loans to Farms

Refer to Table 12 in the state of Kansas 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 farms.

Wichita AA

The percentage of small loans to farms with revenues of $1 million or less was near the percentage of farms with gross annual revenues of $1 million or less and significantly exceeded the aggregate distribution of small loans to farms.

Manhattan AA

The bank originated an insufficient number of small loans to farms to perform a meaningful analysis.

Community Development Lending

The bank made a relatively high level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Wichita AA

During the evaluation period, the bank originated 17 loans totaling $39.1 million in the Wichita AA, representing 7.1 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on the lending test rating. The bank's CD lending supported revitalization and stabilization of LMI areas, economic development, and community services for LMI individuals and families. In addition, the bank's CD lending supported several affordable housing efforts across the state. CD loans exhibited a good level of responsiveness to the credit and community needs in the AA.

Examples of CD loans originated during this evaluation period:

- Two construction loans totaling $23.5 million to finance two buildings in an industrial park. The borrower developed the industrial park on a previously abandoned site that now houses several businesses that provide jobs for LMI individuals.
- A $3.5 million construction loan to a nonprofit affordable housing developer. The loan will create 18 units of permanent affordable housing for low-income disabled persons in a Low-Income Housing Tax Credit (LIHTC) development. A LIHTC is a federal incentive for developing affordable rental housing in the country which offers tax reductions to developers and investors.
- A $2.5 renewable line of credit to a nonprofit which provides an array of community services targeted at LMI individuals and families.

Manhattan AA

During the evaluation period, the bank did not originate any CD loans in the Manhattan AA.

Statewide

In addition to the CD loans that benefited the Wichita AA, the bank originated nine CD loans totaling $43.8 million in the state of Kansas. The loans consisted of: five loans totaling $35.6 million that focused on expanding access to high-speed internet to revitalize distressed and underserved communities; and four loans totaling $8.2 million that supported affordable housing efforts, including renewing a $3.0 million line of credit to a Community Development Financial Institution (CDFI) supporting LIHTC projects in the state, and two loans totaling $2.2 million that supported a LIHTC property and the construction of an affordable housing complex.

Product Innovation and Flexibility

INTRUST made little use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers home mortgage loans through the Fannie Mae HomeReady Mortgage and Freddie Mac HomePossible programs. Both programs are only available to LMI borrowers and have lower downpayment requirements and offer favorable Private Mortgage Insurance schedules. Of the 27 HomePossible loans INTRUST originated during the evaluation period, 22 were in the Wichita AA, totaling $2.9 million. All six HomeReady loans originated during the evaluation period were made within the Wichita AA, totaling $808,750. These originations comprise 2 percent of all home mortgage loans made in the Wichita AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Kansas section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Topeka, Kansas City, and Lawrence AAs was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Kansas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, INTRUST's performance was good in the Wichita AA and was adequate in the Manhattan AA.

The bank had a significant level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited good responsiveness to credit and community development needs. The bank made significant use of innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										2022-2024
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Kansas City AA	6	6,282	7	528	13	8.8	6,810	11.0	1	481
Lawrence AA	5	1,478	11	514	16	10.9	1,992	3.2	1	465
Manhattan AA	7	1,169	7	539	14	9.5	1,708	2.7	1	495
Topeka AA	3	1,006	3	503	6	4.1	1,508	2.4	1	465
Wichita AA	17	26,556	60	3,320	77	52.4	29,876	48.1	2	2,445
Broader Statewide or Regional Area	11	19,695	10	575	21	14.3	20,270	32.6	1	465
Total	**49**	**56,185**	**98**	**5,979**	**147**	**100.0**	**62,164**	**100.0**	**7**	**4,817**

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

Wichita AA

During the current evaluation period, INTRUST had 60 qualified CD investments and grants totaling $3.3 million, which was equivalent to 0.6 percent of allocated tier 1 capital. The bank made two CD investments that totaled $2.5 million and 58 qualified grants that totaled $820,079. Additionally, the AA benefitted from the ongoing impact of 17 prior period CD investments with an outstanding balance of $26.6 million. The bank's CD investments were responsive to affordable housing needs in the AA and consisted of $2.5 million in LIHTC. The bank had $2.4 million in unfunded commitments from LIHTC.

The following are examples of qualified investments in the AA:

- Two donations totaling $60,000 to a nonprofit organization supporting affordable homeownership programs for LMI families.

- Three donations totaling $55,250 to a nonprofit community center program providing free and reduced cost early childhood education programs for LMI families.
- A $50,000 donation to a nonprofit small business technical assistance organization. The nonprofit provides microloans and business development training to emerging entrepreneurs.

INTRUST collaborated in the creation of a Bank On coalition in Wichita in partnership with the United Way of the Plains. The coalition includes INTRUST Bank and other local experts who are actively working to decrease the number of unbanked and underbanked households and improve the financial health of LMI households in the AA. During the evaluation, the bank made a $304,818 donation to United Way of the Plains.

Manhattan AA

During the current evaluation period, INTRUST had seven qualified CD investments and grants totaling $539,240, which was equivalent to 2.6 percent of allocated tier 1 capital. The bank made one CD investment that totaled $500,000 and six qualified grants that totaled $39,240. Additionally, the AA benefitted from the ongoing impact of seven prior period CD investments with an outstanding balance of $1.2 million. The bank's CD investments were responsive to affordable housing needs in the AA and consisted of $500,000 in LIHTC. The bank had $495,000 in unfunded commitments from the LIHTC.

The following are examples of qualified investments in the AA:

- A donation of $25,000 to a community service organization providing access to healthy food for LMI households.
- Two donations totaling $6,000 to a community service nonprofit, which provides health, education, and financial stability programming to LMI clients.
- Two donations totaling $5,000 to a community service organization that provides youth mentorship services to LMI children.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Kansas City MSA, Lawrence MSA, and Topeka MSA was weaker than the bank's overall performance under the Investment Test in the full-scope areas. The performance is based on the bank's adequate level of responsiveness to CD investments, which had a neutral impact on the bank's overall Investment Test performance rating for the state.

SERVICE TEST

The bank's performance under the Service Test in state of Kansas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita AA and Manhattan AA was good.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AAs.

Table 5: Distribution of Branch Delivery Systems*													2022 - 2024
	Deposits	Branches							Population				
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Kansas City AA	7.17	4	12.12	0.00	0.00	0.00	75.00	25.00	1.00	6.81	35.76	56.42	0.00
Lawrence AA	5.01	2	6.06	0.00	0.00	50.00	0.00	50.00	0.00	20.76	48.24	23.13	7.87
Manhattan AA	2.56	3	9.09	0.00	33.33	66.67	0.00	0.00	8.33	28.04	34.79	26.12	2.72
Topeka AA	1.72	1	3.03	0.00	100.00		0.00	0.00	6.96	21.88	43.85	27.31	0.00
Wichita AA	83.55	23	69.70	0.00	13.04	60.87	26.09	0.00	3.20	24.06	41.77	30.41	0.56
Total	**100.00**	**33**	**100.0**	**0.00**	**12.12**	**54.55**	**27.27**	**6.06**	**2.90**	**17.44**	**39.77**	**38.92**	**0.96**
Source: FFIEC File - 2020, 2024 Census													
1/1/2022 - 12/31/2024 Bank Data													
Due to rounding, totals may not equal 100.0%													

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

The bank did not open or close branches in Kansas during the evaluation period.

Wichita AA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

INTRUST operated 23 branches in the AA, comprising zero branches in low-income geographies, three branches in moderate-income geographies, 14 branches in middle-income geographies, and six branches in upper-income geographies. The distribution of branches in low-income geographies was below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was also below the distribution of the population in moderate-income geographies.

While the bank did not move any branch locations during the evaluation period, three branches were previously in moderate-income geographies, but the 2022 demographic data (based on the 2020 U.S. Census information) changed the geographies to middle-income or upper-income. Additionally, four branches in middle- and upper-income geographies were within close proximity to moderate-income geographies. Internal customer data for these branches demonstrated a reasonable level of service to customers in these moderate-income areas. These adjacent branches contributed positively to the service delivery systems conclusion. No branches were in close proximity to low-income geographies.

INTRUST also provided additional access to its retail banking services through alternative delivery systems (ADS), including ATMs and digital banking platforms (e.g., online banking, mobile banking, and telephone banking). Deposit-taking ATMs were generally located at or in close proximity to a branch. The bank had 97 ATMs in the AA, of which 16 were deposit-taking. Three of the bank's 97 ATMs in the AA were located within low-income geographies, comprising 3.1 percent of the bank's ATMs in the AA. The bank had 27 ATMs in moderate-income geographies within the AA, comprising 27.8 percent of the bank's ATMs in the AA. Additionally, the bank offered customers access to the

Allpoint ATM network, which provides surcharge-free ATM services. ADS contributed positively to the service delivery systems conclusion.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. The bank offered traditional products and services at its branches, including personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, home equity, lines of credit, and other personal, commercial, agri-business, and small business loans. Branches were generally open for business 9:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday. INTRUST had two branches with reduced business hours in retirement communities offering services to residents.

Manhattan AA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

INTRUST operated three branches in the AA. The bank does not have any branches in low-income or upper-income geographies, one branch in a moderate-income geography, and two branches in middle-income geographies. The distribution of branches in low-income geographies was below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies exceeded the distribution of the population in moderate-income geographies.

The bank provided additional access to its retail banking services through ADS, including ATMs and digital banking platforms (e.g., online banking, mobile banking, and telephone banking). INTRUST had six ATMs in the AA, with one ATM or 16.7 percent of the bank's ATMs in the AA being in a low-income geography. The bank had two ATMs in moderate-income geographies within the AA, comprising 33.3 percent of the bank's ATMS in the AA. Additionally, the bank offered customers access to the Allpoint ATM network, which provides surcharge-free ATM services. ADS contributed positively to the service delivery systems conclusion.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. The bank offered traditional products and services at its branches, including personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, home equity, lines of credit, and other personal, commercial, agri-business, and small business loans. INTRUST's hours of operation within the AA are uniform: branches were open for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m to 12:00 p.m. Saturday.

Community Development Services

The bank was a leader in providing CD services.

Wichita AA

The bank was a leader in providing CD services in the AA.

During the evaluation period, 71 bank employees provided 2,645 hours of service to 29 different organizations. The CD services were responsive in helping the bank address community needs. Bank staff actively participated on various boards and committees.

The following are examples of qualified services in the AA:

- A bank employee served 154 hours on the Board of Directors and Treasurer for a nonprofit organization, which provides services to LMI individuals and families. Programs offered by the organization include youth mentorship, employment and job training, self-sufficiency programming, and basic needs like food and shelter.
- A bank officer served 160 hours on the Board of Directors for a community organization. This role included serving two sub-committees and providing financial expertise on budget, finance, and human resources. The organization provides critical supportive services for LMI families, including housing stability, workforce training, and mental health services.
- A bank officer served 80 hours on the Board of Directors for a community health organization, which provides access to health services for LMI households, including medical, dental, and behavioral healthcare.

Through a partnership with The Pando Initiative, the bank supported the Reality U program, which provides personalized financial scenario in a classroom. Students practice financial decision-making by managing expenses for housing, transportation, childcare, and insurance. During the evaluation period, 13 bank employees provided 273 hours of volunteer efforts towards this program in the AA. The majority of the students participating in the program are from LMI households.

INTRUST created a Bank On certified checking account named "Safeguard Spending", that offers account holders with access to a low-cost deposit account. These accounts offer benefits such as no overdraft or non-sufficient funds fees, the ability to open an account with any amount, and no monthly maintenance fees. During the evaluation period, INTRUST opened 122 Safeguard Spending accounts in the Wichita AA.

Manhattan AA

The bank provided an adequate level of CD services.

During the evaluation period, three bank employees provided 117 hours of service to nine different organizations.

The following are examples of qualified services in the AA:

- A bank employee served 96 hours on the Board of Directors for a community organization, which provides services for homeless individuals and families.
- A bank employee served six hours on a committee for an organization that serves LMI households. The organization provides access to financial stability, food, and shelter programs.
- A bank employee served 15 hours on the Board of Directors to a social services organization, which provides access to food, financial wellbeing, and workforce development programming to LMI households.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Kansas City AA, Lawrence AA, and Topeka AA was weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is based on the branch distribution in LMI CTs. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma[2]: Satisfactory
The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- An adequate level of lending in LMI tracts.
- An adequate level of lending to borrowers of different income levels.
- The bank made an adequate level of CD loans.
- The bank had an adequate level of qualified investments.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Oklahoma

INTRUST delineated one AA in Oklahoma. The Oklahoma City AA (Canadian, Cleveland, and Oklahoma Counties) is part of the larger Oklahoma City, OK MSA (#36420). INTRUST operates seven branches and six cash dispensing ATMs within the state of Oklahoma. INTRUST opened the seventh branch in the AA in September 2024, but we did not consider it in our analysis given the short tenure during the evaluation period. The primary product types in Oklahoma are home mortgage and small business loans.

The bank operated six branches within the AA, representing 15 percent of the bank's total branches. As of June 30, 2024, the bank had approximately $421.5 million in deposits in Oklahoma, representing 6.4 percent of INTRUST's total deposits. Within the AA, the bank originated and purchased approximately $26.1 billion in reportable loans during the evaluation period. Due to the limited size and business generation in the Oklahoma City AA, less weight will be given to the state of Oklahoma rating within the overall CRA rating.

[2] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Oklahoma City AA

Assessment Area(s) - Oklahoma City AA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	374	7.75	25.94	32.89	28.34	5.08
Population by Geography	1,246,225	6.26	23.54	35.68	32.77	1.74
Housing Units by Geography	506,533	6.68	25.80	36.74	29.17	1.61
Owner-Occupied Housing by Geography	286,019	3.94	19.04	37.49	38.52	1.00
Occupied Rental Units by Geography	173,555	10.01	34.49	36.58	16.56	2.37
Vacant Units by Geography	46,959	11.04	34.92	32.68	18.87	2.50
Businesses by Geography	56,885	5.24	22.90	32.71	36.49	2.66
Farms by Geography	2,202	4.31	21.75	32.83	40.01	1.09
Family Distribution by Income Level	290,675	21.28	17.71	20.36	40.65	0.00
Household Distribution by Income Level	459,574	23.71	16.83	18.46	41.00	0.00
Unemployment rate (%)	4.56	7.84	5.93	4.13	3.12	12.67
Households Below Poverty Level (%)	13.28	31.36	19.88	11.08	5.91	31.27
Median Family Income (36420 - Oklahoma City, OK MSA)		$75,170			Median Housing Value	$146,800
Median Family Income (36420 - Oklahoma City, OK MSA) for 2024		$89,100			Median Gross Rent	$890
					Families Below Poverty Level	9.76

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The Oklahoma City AA consists of 374 census tracts among Canadian, Cleveland, and Oklahoma Counties in Central Oklahoma. During the evaluation period, the AA had 29 low-, 97 moderate-, 123 middle-, and 106 upper-income census tracts. The AA also had 19 census tracts that were NA for income level designation. The table reflects that 29.8 percent of the AA population lives in LMI tracts. According to the 2020 U.S. Census and 2024 D&B Data, the population of the AA is 1,246,225 and the median family income is $75,170. The income distribution for families within the AA is 21.3 percent low-income, 17.7 percent moderate-income, 20.4 percent middle-income, and 40.7 percent upper income.

Demographic data as of 2024 reflects that among the 459,574 households within the AA, approximately 27 percent receive social security, 21 percent are retired, and 13.3 percent are below the poverty level. Approximately 13 percent of the population are over the age 65, while 26 percent of the population consists of civilians not in the work force. The median housing value is $146,800 and 56.5 percent of the housing units are owner-occupied.

Economic Data

The January 2026 Moody's Analytics report for Oklahoma City shows a negative short-term forecast, followed by long-term growth. Oklahoma City employment growth is slowing but still outperforming the state average. The area has a concentration of energy businesses, which is a weak spot due to oil prices trending lower. The price per barrel is near the break-even level for local producers. The report notes strengths for Oklahoma City's economy include diversity among a set of non-energy drivers, the low-cost structure, and the high concentration of prime-age workers. Moody's states that exposure to a volatile energy sector, below-average worker productivity, and few high-tech jobs present weaknesses to the economy. The largest employers within Oklahoma City are Tinker Air Force Base, University of Oklahoma – Norman, and Integris Health.

The unemployment rate increased from 2.8 percent in 2022 to 3.1 percent in 2024. Oklahoma City saw little population growth during the evaluation period, with an average growth rate of 1.2 percent. According to Moody's Analytics, the median household income increased from $66,000 to $72,900 during the evaluation period, with personal income growth averaging 6.4 percent per year.

Housing

Housing affordability ratios in the Oklahoma City AA indicated generally reduced affordability during the assessment period while holding more affordable conditions compared to the U.S. average. Median housing prices increased significantly from 2022 through 2024. The AA had 506,533 total housing units, 459,574 were occupied. Owner-occupied housing represented 62.2 percent of the occupied housing units and occupied rental units totaled 37.8 percent. Median gross rent levels for the three counties in the AA were slightly above that of the State of Oklahoma and lower than the U.S., overall.

Community Contacts

Examiners utilized three existing community contacts to assess the community credit needs of the community, and opportunities for financial institutions in the Oklahoma City AA to address those needs. The contacts comprise two local housing assistance organizations and one local chamber of commerce. The contacts noted that the AA economy is generally stable, while also indicating a vital need for affordable housing. Two of the contacts noted that they have been involved with several banks and the majority of the interactions have been positive. Local institutions have been proactive in developing relationships and offering assistance. One contact noted that some of the small banks in town are risk adverse.

Scope of Evaluation in Oklahoma

Oklahoma has only one AA which received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Oklahoma City AA was adequate.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Oklahoma City AA	48	65	1	6	0	120	100.00	100.00
Total	**48**	**65**	**1**	**6**	**0**	**120**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Oklahoma City AA	7,331	18,375	400	14,685	0	40,791	100.00	100.00
Total	**7,331**	**18,375**	**400**	**14,685**	**0**	**40,791**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

As of June 30, 2024, INTRUST ranked 20th out of 68 depository institutions in the AA with a deposit market share of 0.80 percent. For home mortgage loans in 2024, the bank's market share was 0.03 percent ranking INTRUST 198th out of 499 lenders. The top three lenders were PennyMac Loan Services, LLC with a 4.5 percent market share, First United Bank and Trust Co with a 4.4 percent market share, and Amerihome Mortgage Company, LLC with a 4.1 percent market share. For small loans to businesses in 2023, INTRUST's market share of 0.07 percent ranked 57th out of 143 lenders. The top three lenders were JP Morgan Chase Bank N.A. with a 23.6 percent market share, American Express National Bank with a 22.7 percent market share, and Capital One, N.A. with a 7.1 percent market share. Market information for mortgage loans shows INTRUST operates in a highly competitive lending environment that includes specialized mortgage lending companies and larger state and nationwide banks.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

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.

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

During the evaluation period, the bank's percentage of home mortgage loans in low-income tracts was below both the percentage of owner-occupied homes and the aggregate distribution of home mortgage loans in low-income tracts by all lenders. The bank's percentage of home mortgage loans in moderate-income tracts was significantly below both the percentage of owner-occupied homes and the aggregate distribution of home mortgage loans in moderate-income tracts by all lenders. Owner-occupied housing made up only 3.9 percent of low-income tract housing units and 19 percent of moderate-income tract units with rental housing being 10 percent and 34.5 percent of low- and moderate-income tracts, respectively. Within the AA, 13.3 percent of households were below the poverty level. INTRUST faced very strong competition in the AA with a very small deposit market share and mortgage lending share.

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.

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

During the evaluation period, the bank's percentages of small loans to businesses in LMI tracts significantly exceeded both the percentage of businesses and the aggregate distributions of small loans to businesses in LMI tracts by all lenders.

Small Loans to Farms

Refer to Table 11 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 farms.

There was not a sufficient number of loans to perform a meaningful geographic distribution analysis.

Lending Gap Analysis

Examiners analyzed INTRUST's lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of LMI census tracts with no lending in the AA and evaluated those clusters to determine if demographic information or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home loans to low-income borrowers exceeded aggregate lending but was below the demographic. Lending to moderate-income borrowers exceeded both the aggregate and the demographic.

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 origination and purchase of small loans to businesses.

Loans to small businesses with revenues of less than $1 million was below the aggregate and significantly below the demographic. INTRUST faced very strong competition in the AA with a very small deposit market share and small business lending share competing against large national lenders.

Small Loans to Farms

Refer to Table 12 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.

There was not a sufficient number of loans to perform a meaningful analysis.

Community Development Lending

The bank was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, the bank originated six loans totaling $14.7 million in the Oklahoma City AA representing 33.8 percent of allocated tier 1 capital. The bank's CD lending supported affordable housing and community services for LMI individuals and families.

Examples of CD loans originated during this evaluation period:

- Four loans totaling $8.7 million to a nonprofit organization providing access to health services for LMI Native Americans residing in the AA. The proceeds of the loans will be used to purchase two buildings and refinance two others to build medical facilities which will offer medical, dental, optometry, behavioral health, fitness, nutrition, and other family programs.
- A loan for $3.1 million to refinance an affordable housing complex. The housing complex has a total of 132 affordable housing units that are rent restricted for LMI individuals and families.

Product Innovation and Flexibility

The institution made no use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank did not originate any loans through the HomeReady or HomePossible programs in the Oklahoma City AA during the evaluation period. The bank did not have any other innovative or flexible lending opportunities in the Oklahoma City AA.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Oklahoma is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Oklahoma City AA was adequate.

The bank had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited adequate responsiveness to credit and community development needs. The bank did not use innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										2022-2024
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Oklahoma City AA	8	5,851	6	2,016	14	82.4	7,867	99.9	2	1,948
Broader Statewide or Regional Area	0	0	3	8	3	17.6	8	0.1	0	0
Total	**8**	**5,851**	**9**	**2,024**	**17**	**100.0**	**7,874**	**100.0**	**2**	**1,948**

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

During the current evaluation period, INTRUST had six qualified CD investments and grants totaling $2 million, which was equivalent to 4.6 percent of allocated tier 1 capital. The bank made two CD investments that totaled $2 million and four qualified grants that totaled $16,000. Additionally, the AA benefitted from the ongoing impact of eight prior period CD investments with an outstanding balance of $5.8 million. The bank's CD investments were responsive to affordable housing needs in the AA and consisted of $2 million in LIHTC. The bank had $1.9 million in unfunded commitments from the LIHTC.

The following are examples of qualified investments in the AA:

- Two donations totaling $12,000 for organizations supporting access to health, vision, and dental services to LMI Native American households.
- A $2,000 donation to a community organization providing services for victims of domestic violence and sexual assault survivors.

SERVICE TEST

The bank's performance under the Service Test in state of Oklahoma is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Oklahoma City was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Table 5: Distribution of Branch Delivery Systems														2022 - 2024
Assessment Area	Deposits	Branches								Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)						% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA		Low	Mod	Mid	Upp	NA
Oklahoma City AA	100.00	6	100.00	0.00	16.67	83.33	0.00	0.00		6.26	23.54	35.68	32.77	1.74
Total	**100.00**	**6**	**100.00**	**0.00**	**16.67**	**83.33**	**00.00**	**0.00**		**6.26**	**23.54**	**35.68**	**32.77**	**1.74**
Source: FFIEC File - 2020, 2024 Census 1/1/2022 - 12/31/2024 Bank Data Due to rounding, totals may not equal 100.0%														

INTRUST operated six branches in the AA, comprising zero branches in low-income geographies, one branch in a moderate-income geography, five branches in middle-income geographies, and one branch in upper-income geographies. The bank opened the new branch in an upper-income geography on September 3, 2024; however, the branch was not in operation for a long enough period to be considered within the bank's service performance. The distribution of branches in low-income geographies was below the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. While the bank did not move or change any of their branch locations during the evaluation period, the 2020 U.S. Census information drove a change in the 2022 demographic data. Two branches were previously in LMI geographies.

The bank also provided additional access to its retail banking services through ADS, including ATMs and digital banking platforms (e.g., online banking, mobile banking, telephone banking). The bank had six ATMs in the AA, with one ATM being in a moderate-income tract. Additionally, the bank offers customers access to the Allpoint ATM network, which provides surcharge-free ATM services.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Oklahoma City AA	1	0	0	0	0	1	0
Total	**1**	**0**	**0**	**0**	**0**	**1**	**0**
1/1/2022 - 12/31/2024 Bank Data.							

To the extent changes have been made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened one new branch in the AA and did not close any branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. The bank offered traditional products and services at its branches, including personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, home equity, lines of credit, and other personal, commercial, agri-business, and small business loans. Most branches were open for business 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided an adequate level of CD services.

During the evaluation period, six bank employees provide 314 hours of service to four different organizations.

The following are examples of qualified services in the AA:

- Three bank employees provided 214 hours in a leadership capacity to a revitalization and stabilization district coalition with a to support and retain businesses in the community.
- A bank employee provided 60 hours on the Board of Directors for a nonprofit organization supporting victims of domestic violence.

State Rating

State of Arkansas

CRA rating for the State of Arkansas[3]: Needs to Improve
The Lending Test is rated: Needs to Improve
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibited an adequate distribution of loans to LMI borrowers.
- The bank made a poor level of loans to borrowers of different incomes.
- The bank had made few, if any, CD loans.
- The bank had an adequate level of qualified investments.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

Description of Institution's Operations in Arkansas

INTRUST delineated one AA in Arkansas. The AA is Benton County, which is part of the larger Fayetteville-Springdale-Rogers, AR MSA (#22220). As of June 30, 2024, INTRUST's only branch within the AA held $32.5 million of deposits, representing 0.5 percent of the bank's total deposits and 2.5 percent of the bank's total branches. INTRUST had one ATM in the Arkansas AA.

The Rogers banking center began as a loan production office but is now a full banking center. INTRUST's primary focus within the AA is commercial lending and residential lending. The bank originated and purchased $13.3 million within the AA. Within the AA, home mortgage loans comprised 60.1 percent and small business loans comprised 39.4 percent of lending activity. The bank made no CD loans in the AA during the evaluation period.

[3] For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Benton County AA

Assessment Area(s) - Benton County AA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.00	15.79	47.37	36.84	0.00
Population by Geography	284,333	0.00	15.73	40.89	43.38	0.00
Housing Units by Geography	108,836	0.00	15.48	41.74	42.78	0.00
Owner-Occupied Housing by Geography	65,702	0.00	13.53	41.46	45.01	0.00
Occupied Rental Units by Geography	33,959	0.00	20.17	39.12	40.72	0.00
Vacant Units by Geography	9,175	0.00	12.05	53.45	34.50	0.00
Businesses by Geography	9,174	0.00	13.13	38.39	48.47	0.00
Farms by Geography	380	0.00	22.89	37.89	39.21	0.00
Family Distribution by Income Level	73,075	17.15	16.22	21.94	44.69	0.00
Household Distribution by Income Level	99,661	17.83	14.06	19.27	48.84	0.00
Unemployment rate (%)	2.57	0.00	3.15	2.56	2.36	0.00
Households Below Poverty Level (%)	8.76	0.00	16.78	9.67	4.99	0.00
Median Family Income (22220 - Fayetteville-Springdale-Rogers, AR MSA)		$75,899			Median Housing Value	$184,000
Median Family Income (22220 - Fayetteville-Springdale-Rogers, AR MSA) for 2024		$94,400			Median Gross Rent	$881
					Families Below Poverty Level	6.73

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

The Benton County AA consists of 57 census tracts. During the evaluation period, the AA had zero low-, nine moderate-, 27 middle-, and 21 upper-income census tracts. The table reflects that LMI tracts total 15.8 percent of the AA. According to the 2020 U.S. Census and 2024 D&B Data, the population of the AA is 284,333 and the median family income is $75,899. The income distribution for families within the AA is 17.2 percent low-income; 16.2 percent moderate-income; 21.9 percent middle-income; and 44.7 percent upper income.

Demographic data as of 2024 reflects that among the 99,661 households within the AA, approximately 28 percent receive social security, 17 percent are retired, and 9 percent are below the poverty level. Approximately 13 percent of the population are over the age 65, while 26 percent of the population consists of civilians not in the work force. The median housing value is $184,000 with 60.4 percent of the housing units being owner-occupied. The population in LMI census tracts is low at 15.8 percent. The demographic data also reflects a relatively low percentage of home ownership in LMI geographies, with no owner-occupied housing units in low-income tracts and 13.5 percent owner-occupied housing units in moderate-income tracts. Comparatively, rental housing units and vacant units represent a significant level in moderate-income census tracts at 20.2 percent and 12.1 percent, respectively, of all units.

Economic Data

According to the January 2026 Moody's Analytics report, the Fayetteville-Springdale-Rogers' (FYT) economy is doing well with job growth in 2025 and ranked higher than the state. FYT's strengths include a large concentration of high-wage management jobs, high educational attainment, and favorable age structure. Professional and business services, along with state government and hospitality, are having the greatest growth. Both single- and multi-family housing is growing and near all-time highs. The area's long-term outlook is bright and advancing faster than the state and the U.S. The largest employers in Fayetteville, and specifically Benton County, are Walmart Inc., the University of Arkansas, Tyson Foods, and J.B. Hunt Transport Services. Per capita income for FYT is much higher than the rest of the state of Arkansas and higher than the rest of the U.S. The unemployment rate increased from 2.3 percent in 2022 to 2.7 percent in 2024. Population growth is strong and steady at an average growth rate of about 2.3 percent during the evaluation period. According to Moody's Analytics, median household income has increased from $74,300 to $81,200, and personal income growth has averaged 7.0 percent per year.

Housing

Housing affordability in the Benton County AA is comparable to the U.S. average. Median housing prices increased significantly from 2022 through 2024. The AA had 108,836 total housing units, and 99,661 of the units were occupied. Owner-occupied housing represented 65.9 percent of the occupied housing units and 34.1 percent of housing units were renter-occupied. Median gross rent levels for the AA increased substantially during the evaluation period and were less affordable than the State of Arkansas and relatively even with the U.S.

Community Contacts

We reviewed one existing community contact to determine the credit needs of the community, and opportunities for financial institutions within the AA to address those needs. The contact works in a regional economic development organization. The contact communicated that the primary lending needs of the area are business and home mortgage loans. The contact noted that the area has continued to see significant population growth, which has led to the opening of new businesses. The population increase has also caused a housing shortage causing an increase in home prices and rental costs, leading to a need for affordable housing in the area. The contact stated that several area banks seem to serve their local communities adequately and business owners and borrowers in the area benefit from these banks competing for their business.

Scope of Evaluation in Arkansas

The bank has only one AA in the State of Arkansas which consists of the entirety of Benton County and received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arkansas

LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Benton County AA was poor.

Lending Activity

Lending levels reflected poor responsiveness to AA credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Benton County AA	40	15	1	0	0	56	100.00	100.00
Total	**40**	**15**	**1**	**0**	**0**	**56**	**100.00**	**100.00**
Dollar Volume of Loans ($000s)								
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Consumer**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Benton County AA	8,058	5,290	70	0	0	13,418	100.00	100.00
Total	**8,058**	**5,290**	**70**	**0**	**0**	**13,418**	**100.00**	**100.00**
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

As of June 30, 2024, INTRUST ranked 26th out of 32 depository institutions in the AA with a deposit market share of 0.3 percent. For home mortgage loans in 2024, the bank's market share was 0.13 percent ranking INTRUST 101st out of 370 lenders. The top three lenders were Arvest Bank with a 15.03 percent market share, PennyMac Loan Services with a 5.71 percent market share, and Rocket Mortgage with a 5.09 percent market share. For small loans to businesses in 2023, INTRUST's market share of 0.07 percent ranked 53rd out of 93 lenders. The top three lenders were American Express National Bank with a 22.52 percent market share, JP Morgan Chase Bank, NA with a 16.4 percent market share, and Arvest Bank with a 12.41 percent market share. Market share information for mortgage loans shows INTRUST operates in a highly competitive banking environment that includes specialized mortgage lending companies and larger state and nationwide banks.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the state of Arkansas 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.

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

There were no low-income tracts in the AA. The bank's percentage of home mortgage loans in moderate-income tracts was below the percentage of owner-occupied homes in moderate-income tracts and was below the aggregate distribution of home mortgage loans in moderate-income tracts by all lenders. Competition in the AA was significant with only 13.5 percent of the owner-occupied units being in moderate-income tracts. Rental units and vacant units represented 20.2 percent and 12.1 percent, respectively. The bank had both a very small market and home mortgage lending share in the AA.

Small Loans to Businesses

Refer to Table 9 in the state of Arkansas 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.

There was not a sufficient number of small loans to businesses to perform a meaningful geographic distribution analysis.

Small Loans to Farms

Refer to Table 11 in the state of Arkansas 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 farms.

There was not a sufficient number of small loans to farms to perform a meaningful geographic distribution analysis.

Lending Gap Analysis

Examiners analyzed INTRUST's lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in the AA. Examiners focused on clusters of LMI census tracts with no lending in the AA and evaluated those clusters to determine if demographic information or other performance context data reflected lending opportunities within those clusters. Examiners did not identify any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Arkansas 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 loans to LMI borrowers was significantly below both the aggregate and demographics. At the end of 2024, the average sales price for a home in Benton County was $458,000, exceeding affordability for LMI borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Arkansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

There was not a sufficient number of loans to perform a meaningful analysis.

Small Loans to Farms

Refer to Table 12 in the state of Arkansas 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.

There was not a sufficient number of loans to perform a meaningful analysis.

Community Development Lending

The bank had made few, if any, CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period the bank did not originate any CD loans in the Benton County AA.

Product Innovation and Flexibility

The institution made little use of innovative and/or flexible lending practices in order to serve AA credit needs. Of the 27 HomePossible loans INTRUST Bank originated during the evaluation period, one was in the Benton County AA, totaling $180,500. INTRUST did not originate any HomeReady mortgages in the AA. The HomePossible loan comprises 2.1 percent of total home mortgage originations made in the Benton County AA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in state of Arkansas is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Benton County AA was adequate.

The bank had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibited adequate responsiveness to credit and community development needs. The bank did not use innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*											**2022-2024**
Assessment Area	**Prior Period**		**Current Period**		**Total**				**Unfunded Commitments**	
	#	**$(000's)**	**#**	**$(000's)**	**#**	**% of Total #**	**$(000's)**	**% of Total $**	**#**	**$(000's)**
Benton County AA	5	1,333	2	1,005	7	77.8	2,338	99.9	1	976
Broader Statewide or Regional Area	0	0	2	3	2	22.2	3	0.1	0	0
Total	**5**	**1,333**	**4**	**1,008**	**9**	**100.0**	**2,341**	**100.0**	**1**	**976**

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

During the current evaluation period, INTRUST had two qualified CD investments and grants totaling $1 million, which was equivalent to 32.2 percent of allocated tier 1 capital. The bank made one CD investment that totaled $1 million and a qualified grant that totaled $5,000. Additionally, the AA benefitted from the ongoing impact of prior period CD investments with an outstanding balance of $1.3 million. The bank's CD investments were responsive to affordable housing in the AA and consisted of $1 million in LIHTC and a donation totaling $5,000 to an organization that provides services to homeless individuals. The bank had $976,478 in unfunded commitments from the LIHTC.

SERVICE TEST

The bank's performance under the Service Test in state of Arkansas is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Benton County AA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Table 5: Distribution of Branch Delivery Systems												2022-2024
Assessment Area	Deposits	Branches							Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography			
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp
Benton County AA	100.00	1	100.00	0.00	0.00	0.00	100.00	0.00	0.00	15.73	40.89	43.38
Total	**100.00**	**1**	**100.00**	**0.00**	**0.00**	**0.00**	**100.00**	**0.00**	**0.00**	**15.73**	**40.89**	**43.38**

Source: FFIEC File - 2020, 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

INTRUST operated one branch in the AA, with the lone branch and ATM located in an upper-income geography. The distribution of branches in low-income geographies was equal to the distribution of the population in low-income geographies and the distribution of branches in moderate-income geographies was below the distribution of the population in moderate-income geographies. In addition to the bank's ATM, INTRUST offers customers access to the Allpoint ATM network, which provides surcharge-free ATM services.

The bank did not open or close any branches in the AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. The bank offered traditional products and services at its branch, including personal and business deposit accounts, deposit and withdrawal services, loan payments, wire transfer and money order sales, and loan applications for mortgage, home equity, lines of credit, and other personal, commercial, agri-business, and small business loans. The branch was open for business 8:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 12:00 p.m. Saturday.

Community Development Services

The bank provided an adequate level of CD services.

During the evaluation period, a bank employee provided 53 hours of service to two different organizations. The bank employee served on the Board of Directors and volunteered providing financial counseling to LMI households, which included education on budgeting and savings.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
INTRUST Community Development Corporation	N/A	Home mortgage, small business, small farm Community development loans, qualified investments, community development services
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Kansas		
Wichita AA	Full-Scope	Sedgwick, Butler, and Harvey Counties Part of the larger Wichita, KS MSA (#48620)
Manhattan AA	Full-Scope	Geary and Riley Counties Part of the larger Manhattan, KS MSA (#31740)
Kansas City AA	Limited-Scope	Johnson County Part of the larger Kansas City, MO-KS MSA (#28140)
Lawrence AA	Limited-Scope	Douglas County Part of the Lawrence, KS MSA (#29940)
Topeka AA	Limited-Scope	Shawnee County Part of the larger Topeka, KS MSA (#45820)
Oklahoma		
Oklahoma City AA	Full-Scope	Canadian, Cleveland, and Oklahoma Counties Part of the larger Oklahoma City, OK MSA (#36420)
Arkansas		
Benton County AA	Full-Scope	Benton County Part of the larger Fayetteville-Springdale-Rogers, AR MSA (#22220)

Appendix B: Summary of State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
INTRUST Bank, NA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Kansas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Arkansas	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table 8. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

Table 9. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares the percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's AA.

Table 10. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: (1) the percentage distribution of businesses with revenues of greater than $1 million; and (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - Compares the percentage distribution of the number of small loans (less than or equal to $500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to $500,000) originated and purchased by the bank to farms with revenues of $1 million or less to: (1) the percentage distribution of farms with revenues of greater than $1 million; and (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Kansas

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Kansas City AA	97	39,595	7.45	50,229	0.32	--	0.18	4.69	1.03	4.69	34.25	26.80	34.30	60.74	72.16	60.82	--	--	--
Lawrence AA	35	8,524	2.69	7,030	--	--	--	17.93	20.00	21.00	53.99	42.86	51.61	27.93	34.29	25.97	0.14	2.86	1.42
Manhattan AA	54	7,627	4.15	7,540	4.00	22.22	5.57	17.32	1.85	18.30	35.89	42.59	43.05	42.53	31.48	32.48	0.27	1.85	0.60
Topeka AA	8	2,329	0.61	12,714	4.11	12.50	3.30	16.18	25.00	16.71	47.43	37.50	48.33	32.28	25.00	31.65	--	--	--
Wichita AA	1,108	164,381	85.10	49,084	1.69	1.44	1.45	18.32	13.09	18.69	45.95	47.29	44.02	33.87	37.91	35.64	0.17	0.27	0.19
Total	**1,302**	**222,457**	**100.00**	**126,597**	**1.43**	**2.23**	**1.30**	**12.55**	**11.98**	**13.04**	**41.51**	**45.39**	**40.96**	**44.43**	**40.02**	**44.51**	**0.08**	**0.38**	**0.19**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Kansas City AA	97	39,595	7.45	50,229	11.53	5.15	4.16	13.15	7.22	12.79	20.38	8.25	19.69	54.93	58.76	48.84	--	20.62	14.52
Lawrence AA	35	8,524	2.69	7,030	19.64	8.57	8.08	18.85	5.71	19.20	22.60	20.00	20.33	38.90	45.71	36.97	--	20.00	15.42
Manhattan AA	54	7,627	4.15	7,540	23.43	1.85	5.50	17.84	11.11	17.90	21.05	9.26	20.24	37.68	22.22	27.14	--	55.56	29.22
Topeka AA	8	2,329	0.61	12,714	18.60	--	9.56	18.45	25.00	21.90	23.70	12.50	21.83	39.26	37.50	29.15	--	25.00	17.56
Wichita AA	1,108	164,381	85.10	49,084	19.37	8.48	8.81	18.49	19.86	19.42	21.58	19.22	20.15	40.55	34.66	28.23	--	17.78	23.39
Total	**1,302**	**222,457**	**100.00**	**126,597**	**16.48**	**7.91**	**6.80**	**16.40**	**18.20**	**16.94**	**21.38**	**17.97**	**20.15**	**45.74**	**36.25**	**36.92**	**--**	**19.66**	**19.19**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 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
Kansas City AA	168	45,669	11.28	52,194	0.62	--	0.65	5.02	5.95	4.66	30.61	19.64	27.19	60.32	65.48	64.02	3.43	8.93	3.47
Lawrence AA	49	15,128	3.29	5,824	--	--	--	24.07	16.33	24.38	47.78	26.53	46.45	23.91	53.06	26.39	4.24	4.08	2.78
Manhattan AA	85	16,534	5.70	2,988	10.66	17.65	6.53	13.77	8.24	13.92	45.75	57.65	46.42	28.98	16.47	32.97	0.83	--	0.17
Topeka AA	28	11,462	1.88	6,284	6.35	10.71	4.44	27.22	10.71	19.96	41.72	39.29	44.97	24.70	39.29	30.63	--	--	--
Wichita AA	1,160	269,706	77.85	32,105	2.44	2.76	2.30	22.45	23.02	19.96	37.11	37.24	35.71	35.75	33.45	39.49	2.25	3.53	2.53
Total	**1,490**	**358,499**	**100.00**	**99,395**	**2.17**	**3.36**	**1.56**	**14.42**	**19.80**	**12.00**	**35.53**	**36.11**	**32.77**	**45.22**	**36.85**	**50.85**	**2.65**	**3.89**	**2.81**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 - 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
Kansas City AA	168	45,669	11.28	52,194	84.54	34.52	51.74	5.17	65.48	10.29	--
Lawrence AA	49	15,128	3.29	5,824	85.01	67.35	55.07	4.46	30.61	10.53	2.04
Manhattan AA	85	16,534	5.70	2,988	80.01	70.59	52.88	4.40	29.41	15.59	--
Topeka AA	28	11,462	1.88	6,284	79.66	39.29	47.96	5.51	60.71	14.83	--
Wichita AA	1,160	269,706	77.85	32,105	82.86	44.31	52.86	5.39	55.17	11.76	0.52
Total	**1,490**	**358,499**	**100.00**	**99,395**	**83.35**	**45.37**	**52.09**	**5.20**	**54.16**	**11.45**	**0.47**

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

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Kansas City AA	3	636	3.26	316	0.71	--	1.58	4.27	--	0.63	32.62	--	27.22	61.68	100.00	69.30	0.71	--	1.27
Lawrence AA	2	900	2.17	158	--	--	--	18.92	100.00	10.76	57.30	--	72.78	23.78	--	16.46	--	--	--
Manhattan AA	4	878	4.35	188	2.40	--	--	22.75	50.00	29.79	30.54	50.00	27.13	43.71	--	43.09	0.60	--	--
Topeka AA	0	0	0.00	99	2.01	--	5.05	11.65	--	5.05	46.99	--	36.36	39.36	--	53.54	--	--	--
Wichita AA	83	10,414	90.22	1,363	0.76	--	--	13.10	--	3.37	46.54	87.95	65.96	38.64	12.05	30.45	0.97	--	0.22
Total	**92**	**12,828**	**100.00**	**2,124**	**0.93**	**--**	**0.47**	**10.94**	**4.35**	**5.93**	**41.34**	**81.52**	**55.89**	**46.11**	**14.13**	**37.38**	**0.68**	**--**	**0.33**

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

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City AA	3	636	3.26	316	96.20	100.00	65.82	2.37	--	1.42	--
Lawrence AA	2	900	2.17	158	96.22	--	53.16	2.70	100.00	1.08	--
Manhattan AA	4	878	4.35	188	95.81	100.00	48.94	1.80	--	2.40	--
Topeka AA	0	0	0.00	99	98.80	--	44.44	1.20	--	--	--
Wichita AA	83	10,414	90.22	1,363	98.16	90.36	59.06	0.97	9.64	0.87	--
Total	**92**	**12,828**	**100.00**	**2,124**	**97.21**	**89.13**	**58.05**	**1.69**	**10.87**	**1.10**	**--**

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

Oklahoma

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography — 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Oklahoma City AA	48	7,331	100.00	103,224	3.94	2.08	3.20	19.04	2.08	16.82	37.49	50.00	35.45	38.52	45.83	43.80	1.00	--	0.72
Total	**48**	**7,331**	**100.00**	**103,224**	**3.94**	**2.08**	**3.20**	**19.04**	**2.08**	**16.82**	**37.49**	**50.00**	**35.45**	**38.52**	**45.83**	**43.80**	**1.00**	**--**	**0.72**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower — 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Oklahoma City AA	48	7,331	100.00	103,224	21.28	10.42	6.31	17.71	22.92	16.26	20.36	6.25	18.60	40.65	33.33	31.22	--	27.08	27.61
Total	**48**	**7,331**	**100.00**	**103,224**	**21.28**	**10.42**	**6.31**	**17.71**	**22.92**	**16.26**	**20.36**	**6.25**	**18.60**	**40.65**	**33.33**	**31.22**	**--**	**27.08**	**27.61**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography — 2022 - 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 City AA-2024	65	18,375	100.00	84,850	5.24	10.77	4.22	22.90	44.62	19.60	32.71	20.00	30.82	36.49	23.08	43.48	2.66	1.54	1.77
Total	**65**	**18,375**	**100.00**	**84,850**	**5.24**	**10.77**	**4.22**	**22.90**	**44.62**	**19.60**	**32.71**	**20.00**	**30.82**	**36.49**	**23.08**	**43.48**	**2.66**	**1.54**	**1.77**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 - 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 City AA	65	18,375	100.00	84,850	87.31	43.08	53.63	3.34	55.38	9.35	1.54
Total	**65**	**18,375**	**100.00**	**84,850**	**87.31**	**43.08**	**53.63**	**3.34**	**55.38**	**9.35**	**1.54**

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

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2022 - 2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	
Oklahoma City AA	1	400	100.00	1,216	4.31	--	0.66	21.75	--	16.28	32.83	--	24.84	40.01	100.00	57.65	1.09	--	0.58	
Total	**1**	**400**	**100.00**	**1,216**	**4.31**	**--**	**0.66**	**21.75**	**--**	**16.28**	**32.83**	**--**	**24.84**	**40.01**	**100.00**	**57.65**	**1.09**	**--**	**0.58**	

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

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Oklahoma City AA	1	400	100.00	1,216	98.23	100.00	73.27	0.77	--	1.00	--
Total	**1**	**400**	**100.00**	**1,216**	**98.23**	**100.00**	**73.27**	**0.77**	**--**	**1.00**	**--**

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

Arkansas

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																					2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Benton County AA	40	8,058	100.00	35,694	--	--	--	13.53	7.50	10.92	41.46	20.00	36.69	45.01	72.50	52.34	--	--	--		
Total	**40**	**8,058**	**100.00**	**35,694**	**--**	**--**	**--**	**13.53**	**7.50**	**10.92**	**41.46**	**20.00**	**36.69**	**45.01**	**72.50**	**52.34**	**--**	**--**	**--**		

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Benton County AA	40	8,058	100.00	35,694	17.15	2.50	4.69	16.22	5.00	12.99	21.94	15.00	19.02	44.69	57.50	41.97	--	20.00	21.33
Total	**40**	**8,058**	**100.00**	**35,694**	**17.15**	**2.50**	**4.69**	**16.22**	**5.00**	**12.99**	**21.94**	**15.00**	**19.02**	**44.69**	**57.50**	**41.97**	**--**	**20.00**	**21.33**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 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
Benton County AA	15	5,290	100.00	21,318	--	--	--	13.13	--	13.05	38.39	40.00	36.05	48.47	60.00	50.90	--	--	--
Total	**15**	**5,290**	**100.00**	**21,318**	**--**	**--**	**--**	**13.13**	**--**	**13.05**	**38.39**	**40.00**	**36.05**	**48.47**	**60.00**	**50.90**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 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 - 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**
Benton County AA	15	5,290	100.00	21,318	83.81	66.67	53.98	3.59	33.33	12.60	--
Total	**15**	**5,290**	**100.00**	**21,318**	**83.81**	**66.67**	**53.98**	**3.59**	**33.33**	**12.60**	**--**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Farm**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Aggregate**
Benton County AA	1	70	100.00	1,052	--	--	--	22.89	--	35.27	37.89	100.00	49.24	39.21	--	15.49	--	--	--
Total	**1**	**70**	**100.00**	**1,052**	**--**	**--**	**--**	**22.89**	**--**	**35.27**	**37.89**	**100.00**	**49.24**	**39.21**	**--**	**15.49**	**--**	**--**	**--**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	**Total Loans to Farms**				**Farms with Revenues <= 1MM**			**Farms with Revenues > 1MM**		**Farms with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Farms**	**% Bank Loans**	**% Aggregate**	**% Farms**	**% Bank Loans**	**% Farms**	**% Bank Loans**
Benton County AA	1	70	100.00	1,052	96.84	100.00	76.43	0.53	--	2.63	--
Total	**1**	**70**	**100.00**	**1,052**	**96.84**	**100.00**	**76.43**	**0.53**	**--**	**2.63**	**--**
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											