

## CRA PUBLIC COMMENTS

No CRA public comments have been received.

# CRA PERFORMANCE EVALUATION

# **PUBLIC DISCLOSURE**

July 31, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Bank & Trust Co.  
Certificate Number: 27394

923 West Main Street  
Duncan, Oklahoma 73533

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Regional Office

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas (AAs), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit ratio (LTD) is reasonable (considering seasonal variations and taking into account lending-related activities), given the institution's size, financial condition, and AAs' credit needs.
- A majority of loans are in the institution's AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

**The Community Development Test is rated Outstanding.**

The institution's community development (CD) performance demonstrates excellent responsiveness to CD needs in its AAs through CD loans, qualified investments (QIs), and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the institution's AAs.

## DESCRIPTION OF INSTITUTION

First Bank & Trust Co. (FBT) maintains its headquarters in Duncan, Oklahoma, and is privately owned. The bank received a Satisfactory rating at its June 8, 2020 FDIC Performance Evaluation based on Intermediate Small Bank Procedures.

FBT functions as a retail bank operating 12 full-service branches and 1 limited-service, drive-thru location in Oklahoma. Since the previous evaluation, the bank converted a loan production office located in an upper-income census tract in Edmond into a full-service branch. The bank also acquired Stroud National Bank, Stroud, Oklahoma, on June 29, 2021. This acquisition added a full-service branch (Wellston) located in a moderate-income census tract and two full-service branches (Stroud and Perkins) located in middle-income census tracts.

The bank offers various loan products including commercial, home mortgage, agricultural, and consumer loans, primarily focusing on commercial and home mortgage lending. The institution also offered loans through the Small Business Administration (SBA) Paycheck Protection Program (PPP) and originated 726 PPP loans totaling approximately \$16.1 million during the evaluation period. The SBA, with support from the Department of the Treasury, implemented the PPP, which provides loans to encourage qualified businesses that meet certain standards established by the SBA to retain employees through the COVID-19 pandemic. The program includes loan forgiveness subject to certain conditions.

The bank provides a variety of deposit products including checking, savings, and certificate of deposit accounts. Alternative banking services include internet and mobile banking, electronic bill pay, and 13 bank-owned automated teller machines (ATMs).

As of March 31, 2023, the institution's assets totaled approximately \$838.8 million, total loans equaled \$690.3 million, and total deposits equaled \$726.9 million. Since the prior evaluation, total assets increased by 45.3 percent, total loans increased by 47.3 percent, and total deposits increased by 50.9 percent primarily due to the acquisition noted previously.

The following table illustrates the outstanding loan portfolio as of March 31, 2023, reflecting a distribution supportive of the institution's business focus, with commercial loans and home mortgage loans representing the largest portions of the loan portfolio.

<b>Loan Portfolio Distribution as of 3/31/2023</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	88,221	12.8
Secured by Farmland	73,315	10.6
Secured by 1-4 Family Residential Properties	179,942	26.1
Secured by Multifamily (5 or more) Residential Properties	45,471	6.6
Secured by Nonfarm Nonresidential Properties	248,675	36.0
<b>Total Real Estate Loans</b>	<b>635,624</b>	<b>92.1</b>
Commercial and Industrial Loans	27,494	4.0
Agricultural Production and Other Loans to Farmers	5,272	0.8
Consumer Loans	19,580	2.8
Obligations of State and Political Subdivisions in the U.S.	2,300	0.3
Other Loans	1	<0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>690,271</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0.</i>		

Examiners did not identify any financial, legal, or other impediments that affect the institution’s ability to meet its AAs’ credit needs.

## **DESCRIPTION OF ASSESSMENT AREAS**

FBT delineated a portion of the Oklahoma City, Oklahoma Metropolitan Statistical Area (MSA) and portions of the Oklahoma Non-MSA as its AAs. The bank’s AAs meet the technical requirements of the CRA. The following table provides additional details regarding the AAs. Refer to the individual AAs’ sections for additional details.

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of CTs</b>	<b># of Branches</b>
Oklahoma City MSA	Cleveland, Lincoln, and Oklahoma	345	5
Oklahoma Non-MSA	Carter, Jefferson, Payne*, and Stephens	53	7
<i>Source: Bank Data; 2020 U.S. Census Data. *Non-contiguous county.</i>			

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated June 8, 2020, to the current evaluation dated July 31, 2023. Examiners used Intermediate Small Bank Procedures to evaluate FBT’s CRA performance. These procedures include two tests: the Lending Test and the Community Development Test. The appendix lists each tests’ criteria.

Examiners applied full-scope procedures to both AAs due to the addition of new branches and AA changes resulting from the acquisition. Based on the concentration of loans typically considered for CRA as well as volume of deposits and branches noted in the following table, examiners weighed performance more heavily in the Oklahoma Non-MSA AA when arriving at conclusions and the rating.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Oklahoma Non-MSA	76,238	58.3	563,435	81.0	7	58.3
Oklahoma City MSA	54,511	41.7	132,528	19.0	5	41.7
<b>Total</b>	<b>130,749</b>	<b>100.0</b>	<b>695,963</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>

*Source: 2022 Bank Data; FDIC Summary of Deposits (6/30/2022). Due to rounding, totals may not equal 100.0.*

### Activities Reviewed

Intermediate Small Bank Procedures require examiners to determine the bank’s major product lines from which to review. Examiners may select from the same loan categories used for Large Bank evaluations: home mortgage, small business, small farm, and consumer loans. The following table shows bank lending activity for 2022.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	87,633	26.5	132	8.6
Secured by Farmland	36,898	11.1	62	4.1
Secured by 1-4 Family Residential Properties	65,494	19.8	367	24.0
Multi-Family (5 or more) Residential Properties	12,754	3.9	9	0.6
Commercial Real Estate Loans	95,140	28.7	67	4.4
Commercial and Industrial Loans	19,681	5.9	237	15.5
Agricultural Loans	1,956	0.6	39	2.5
Consumer Loans	10,984	3.3	614	40.2
Other Loans	673	0.2	1	0.1
<b>Total Loans</b>	<b>331,213</b>	<b>100.0</b>	<b>1,528</b>	<b>100.0</b>

*Source: 2022 Bank Data. Due to rounding, totals may not equal 100.0.*

Considering the dollar volume and number of loans originated, as well as management’s stated business strategy, examiners determined the bank’s major product lines consist of commercial and home mortgage lending. Since the other categories typically reviewed for CRA do not represent major product lines, considering both number and dollar, they would not materially affect any conclusions or ratings. Therefore, this evaluation does not include a review of them. Bank records indicate that the lending focus and product mix remained generally consistent throughout the evaluation period.

FBT reports home mortgage loans pursuant to the Home Mortgage Disclosure Act (HMDA). Therefore, for the Lending Test this evaluation includes a review of all home mortgage loans reported on the bank’s 2020, 2021, and 2022 HMDA Loan Application Registers (LARs), as follows:

- 2020: 389 home mortgage loans totaling \$54.4 million,
- 2021: 300 home mortgage loans totaling \$47.8 million, and
- 2022: 317 home mortgage loans totaling \$63.1 million.

Available aggregate data served as the primary standard of comparison for home mortgage loans. Examiners did not identify any trends in performance between the years reviewed that would materially affect conclusions. Therefore, the geographic distribution and borrower profile analyses present home mortgage loan data for 2021, the most recent year for which aggregate data exists. However, the AA Concentration presents home mortgage loan data for all years reviewed.

This evaluation also includes a review of the following small business loans originated or purchased in 2022 for the noted performance factors, which represents the most recent completed calendar year of available data:

- Assessment Area Concentration – universe of 286 small business loans totaling \$31.9 million;
- Geographic Distribution – universe of 212 small business loans totaling \$21.6 million originated in the bank’s AAs; and
- Borrower Profile – sample of 143 small business loans totaling \$14.2 million taken from the universe of small business loans originated in the bank’s AAs.

D&B data for 2022 provided a standard comparison for small business loans.

Examiners considered the universe of small business and home mortgage loans when determining loan product weighting. The following table shows that home mortgage loans represent a majority by number and dollar of the loan categories reviewed. Therefore, home mortgage loans received slightly more weight when arriving at a conclusion for the AA concentration. However, upon further review when considering the distribution of loans in each AA, small business loans received more weight in the Oklahoma City MSA AA, while home mortgage loans received more weight in the Oklahoma Non-MSA AA.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Universe</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Mortgage	317	52.6	63,070	66.4
Small Business	286	47.4	31,924	33.6
<b>Total Loans</b>	<b>603</b>	<b>100.0</b>	<b>94,994</b>	<b>100.0</b>

*Source: 2022 HMDA LAR and 2022 Bank Data. Due to rounding, totals may not equal 100.0.*

While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans when arriving at conclusions for the performance factors because the number of loans better indicates the number of businesses and individuals served.

For the Community Development Test, the scope of the evaluation includes data provided by bank management on CD loans, QIs, and CD services since the prior evaluation. The evaluation of QIs also considers the book value of prior period QIs that remain outstanding as of this evaluation’s date.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

FBT demonstrated satisfactory performance regarding the Lending Test. A reasonable LTD ratio, reasonable records regarding geographic distribution and borrower profile, and a majority of loans originated inside the AAs support this conclusion.

#### Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution’s size, financial condition, and AAs’ credit needs. The LTD ratio, calculated from Call Report data averaged 86.6 percent over the past 12 calendar quarters from June 30, 2020, to March 31, 2023, which slightly decreased from the 87.1 percent average net LTD ratio reported at the previous evaluation. The ratio ranged from a low of 77.8 percent as of March 31, 2022 to a high of 93.7 percent as of March 31, 2023.

Examiners identified and listed in the following table comparable institutions operating in similar areas, with comparable asset sizes and lending emphases. As illustrated, FBT’s average net LTD ratio remains within a reasonable range of the comparable institutions.

<b>Loan-to-Deposit (LTD) Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 3/31/2023 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>First Bank &amp; Trust Co. – Duncan, OK</b>	<b>838,838</b>	<b>86.6</b>
First National Bank of Oklahoma – Oklahoma City, OK	767,028	83.3
F&M Bank – Edmond, OK	674,410	69.4
Frist National Bank and Trust – Ardmore, OK	674,492	68.8
<i>Source: Reports of Condition and Income 6/30/2020 – 3/31/2023.</i>		

**Assessment Area Concentration**

A majority of loans are in the institution’s AAs. The following table shows that FBT originated a majority of home mortgage and small business loans, by number and dollar volume, in the AAs.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		<b>Total</b>
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	<b>\$(000s)</b>
Home Mortgage										
2020	329	84.6	60	15.4	389	35,201	64.7	19,182	35.3	54,383
2021	238	79.3	62	20.7	300	28,968	60.6	18,872	39.4	47,840
2022	242	76.3	75	23.7	317	41,316	65.5	21,754	34.5	63,070
<b>Subtotal</b>	<b>809</b>	<b>80.4</b>	<b>197</b>	<b>19.6</b>	<b>1,006</b>	<b>105,485</b>	<b>63.8</b>	<b>59,808</b>	<b>36.2</b>	<b>165,293</b>
Small Business	212	74.1	74	25.9	286	21,619	67.7	10,305	32.3	31,924

*Source: HMDA Reported Data; 2022 Bank Data. Due to rounding, totals may not equal 100.0.*

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Reasonable performance in the Oklahoma Non-MSA AA outweighs poor performance in the Oklahoma City MSA AA to support this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts within the AAs when arriving at conclusions for this performance factor.

**Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among individuals of different income levels and businesses of different sizes. Reasonable records in the Oklahoma Non-MSA AA and the Oklahoma City MSA AA support this conclusion. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses with gross annual revenue of \$1 million or less within the AAs when arriving at conclusions for this performance factor.

**Response to Complaints**

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

**COMMUNITY DEVELOPMENT TEST**

FBT demonstrated an outstanding record regarding the Community Development Test. The institution’s CD performance demonstrates excellent responsiveness to CD needs in its AAs through CD loans, QIs, and CD services as appropriate, considering the institution’s capacity and the need and availability of such opportunities for CD in the institution’s AAs. Examiners also

considered CD activities within the broader statewide/regional area since the bank proved responsive to the needs of its AAs.

### **Community Development Loans**

The following table shows that since the prior evaluation, the bank originated 25 CD loans totaling \$90.8 million. This level equates to 12.1 percent of average total assets of \$749.8 million since the prior evaluation and 15.9 percent of average net loans of \$570.7 million for the same timeframe. These notable levels reflect an increase from the 9.2 percent of average total assets and 12.3 percent of average net loans reported at the previous evaluation.

The CD loans proved highly responsive to the areas’ needs given that a significant majority of activities supported economic development and community services, both of which represent significant identified CD needs in the AAs. The following tables illustrate the bank’s CD lending by AA, purpose, and year.

<b>Community Development Lending by Year</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2020*	1	618	0	0	1	7,365	1	7,715	3	15,698
2021	0	0	3	160	2	17,197	0	0	5	17,357
2022	3	8,106	3	1,163	3	29,004	1	1,135	10	39,408
YTD 2023	1	1,036	6	17,348	0	0	0	0	7	18,384
<b>Total</b>	<b>5</b>	<b>9,760</b>	<b>12</b>	<b>18,671</b>	<b>6</b>	<b>53,566</b>	<b>2</b>	<b>8,850</b>	<b>25</b>	<b>90,847</b>

*Source: Bank Data. \*Since prior evaluation.*

<b>Community Development Lending by Assessment Area</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Oklahoma City MSA	5	9,760	3	5,724	2	17,197	0	0	10	32,681
Oklahoma Non-MSA	0	0	9	12,947	3	34,009	0	0	12	46,956
Statewide Activities	0	0	0	0	1	2,360	2	8,850	3	11,210
<b>Total</b>	<b>5</b>	<b>9,760</b>	<b>12</b>	<b>18,671</b>	<b>6</b>	<b>53,566</b>	<b>2</b>	<b>8,850</b>	<b>25</b>	<b>90,847</b>

*Source: Bank Data.*

The following lists an example of a CD loan benefitting the broader statewide area.

- ***Economic Development*** – In 2022, the bank originated a loan for \$2.4 million to purchase and renovate a hotel resort property. The hotel’s purpose supports the community by providing jobs to low- and moderate-income individuals in the area. The activity promotes economic development by financing an entity that meets the size eligibility standards of the regulation and by supporting permanent job creation, retention, and improvement for low- and moderate-income persons in the hospitality industry.

## Qualified Investments

The bank made use of 92 QIs totaling approximately \$3.0 million. The total dollar volume equates to 0.4 percent of average total assets of \$749.8 million and 3.4 percent of average total securities of \$88.0 million. These levels reflect an increase from the 0.1 percent of average total assets and 0.8 percent of average total securities recorded at the prior evaluation.

As reflected in the following tables, the QIs primarily supported revitalization and stabilization efforts and community services. Community services represent an identified need of both AAs, and this shows the bank’s adequate responsiveness in addressing CD needs. The following tables illustrate the bank’s QIs by AA, purpose, and year.

Qualified Investments by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020*	0	0	0	0	0	0	0	0	0	0
2021	0	0	7	1,095	0	0	8	1,800	15	2,895
2022	0	0	0	0	0	0	0	0	0	0
YTD 2023	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>1,095</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>1,800</b>	<b>15</b>	<b>2,895</b>
Qualified Grants & Donations	0	0	49	69	28	17	0	0	77	86
<b>Total</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>1,164</b>	<b>28</b>	<b>17</b>	<b>8</b>	<b>1,800</b>	<b>92</b>	<b>2,981</b>

Source: Bank Data. \*Since prior evaluation.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oklahoma City MSA	0	0	6	7	7	4	3	905	16	916
Oklahoma Non-MSA	0	0	45	417	20	13	0	0	65	430
Statewide Activities	0	0	5	740	1	0	5	895	11	1,635
<b>Total</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>1,164</b>	<b>28</b>	<b>17</b>	<b>8</b>	<b>1,800</b>	<b>92</b>	<b>2,981</b>

Source: Bank Data.

The following lists an example of a QI benefitting the broader statewide area.

- **Community Services** – The bank made a \$350,000 investment in school bonds in a district in Oklahoma, where a majority of students received free or reduced lunches. The investment benefits an organization that provides community services, in the form of educational services, targeted to low- and moderate-income individuals.

**Community Development Services**

The following table shows FBT provided 53 CD services since the prior evaluation. This level reflects a decrease over the 126 CD services at the prior evaluation. The services involve bank personnel’s use of their technical expertise to benefit organizations or projects in the AAs with a primary purpose of CD, as defined by the CRA regulation. Nearly all of the CD services benefited community service organizations that provide services to low- and moderate-income individuals, which demonstrate the bank’s notable responsiveness to an identified CD need in both AAs. The following tables detail the bank’s CD services by AA, purpose, and year.

<b>Community Development Services by Year</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2020*	0	2	1	0	<b>3</b>
2021	0	9	1	0	<b>10</b>
2022	0	17	2	0	<b>19</b>
YTD 2023	0	19	2	0	<b>21</b>
<b>Total</b>	<b>0</b>	<b>47</b>	<b>6</b>	<b>0</b>	<b>53</b>

*Source: Bank Data. \*Since prior evaluation.*

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Oklahoma City MSA	0	10	0	0	<b>10</b>
Oklahoma Non-MSA	0	37	6	0	<b>43</b>
<b>Total</b>	<b>0</b>	<b>47</b>	<b>6</b>	<b>0</b>	<b>53</b>

*Source: Bank Data.*

Regarding the availability of services, the bank operates two branches and two ATMs in moderate-income census tracts. Additionally, the bank provides alternative delivery systems such as internet, mobile, and telephone banking as well as electronic bill pay that help avail the bank’s services to low- and moderate-income individuals and geographies across all portions of the AAs.

**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank’s compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## **OKLAHOMA NON-MSA AA – Full-Scope Review**

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN OKLAHOMA NON-MSA AA**

The combined Oklahoma Non-MSA AA includes all of Carter, Jefferson, Payne, and Stephens counties. The combined AA consists of two non-contiguous AAs: Carter, Jefferson, and Stephens counties located in southcentral Oklahoma and Payne County located in northcentral Oklahoma. This reflects a change since the previous evaluation with the designation of Payne County as an AA due to the acquisition of the Perkins branch of Stroud National Bank. Since examiners did not identify any anomalies in performance between the separate non-MSA AAs, this evaluation combines them for presentation purposes.

The AA also includes 11 additional census tracts, 5 of which are designated moderate-income census tracts, since the prior evaluation due to changes resulting from the 2020 U.S. Census Data. The bank operates seven full-service locations, eight ATMs, and a limited-service, drive-thru location in the AA. The branches maintain hours consistent with the area and the industry. The delivery systems and range of products and services remain consistent with those reflected in the overall Description of Institution Section of this performance evaluation.

#### **Economic and Demographic Data**

Based on 2020 U.S. Census Data, the AA’s 53 census tracts include the following income designations: 2 low-, 13 moderate-, 21 middle-, and 15 upper-income census tracts, as well as 2 census tracts without an income designation. The following table provides select demographic characteristics for this AA.

Demographic Information of the Assessment Area Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	3.8	24.5	39.6	28.3	3.8
Population by Geography	177,834	1.8	20.6	39.8	35.1	2.7
Housing Units by Geography	82,469	2.3	20.7	41.9	32.9	2.2
Owner-Occupied Units by Geography	42,750	0.0	14.4	43.6	41.7	0.3
Occupied Rental Units by Geography	26,059	5.5	27.5	38.5	24.0	4.5
Vacant Units by Geography	13,660	3.4	27.5	43.0	22.3	3.7
Businesses by Geography	18,439	2.6	16.5	39.8	40.0	1.0
Farms by Geography	925	1.0	12.3	41.3	45.1	0.3
Family Distribution by Income Level	41,071	19.1	16.7	18.5	45.7	0.0
Household Distribution by Income Level	68,809	25.0	16.4	16.4	42.2	0.0
Median Family Income – OK Non-MSA	\$58,565		Median Housing Value			\$129,085
			Median Gross Rent			\$795
			Families Below Poverty Level			12.0%

*Source: 2020 U.S. Census Data and 2022 D&B Data. Due to rounding, totals may not equal 100.0.  
(\*) The NA category consists of geographies that have not been assigned an income classification.*

FEMA made disaster declarations affecting all AA counties on December 21, 2020, due to severe ice storms and on February 24, 2021, due to severe winter storms. According to the Duncan Area Economic Development Foundation, major employers in the area include Duncan Regional Hospital, Halliburton, Family Dollar, Walmart, and Duncan Public Schools. The following table shows annual unemployment rates over the evaluation period for the AA, State of Oklahoma, and nationwide, which show a decline since the onset of the COVID-19 pandemic in 2020.

Unemployment Rates			
Area	2020	2021	2022
	%	%	%
Carter County	5.4	3.0	3.0
Jefferson County	5.6	2.4	2.9
Payne County	4.2	2.1	2.3
Stephens County	6.8	2.8	2.9
State of Oklahoma	5.1	2.5	2.6
National Average	6.7	3.9	3.5

*Source: Bureau of Labor Statistics.*

Examiners used the applicable FFIEC-updated median family income levels to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle-, and upper-income ranges based on the 2021 FFIEC-updated median family income of \$58,100 for the Oklahoma Non-MSA.

<b>Median Family Income Ranges – Oklahoma Non-MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2021 (\$58,100)	<\$29,050	\$29,050 to <\$46,480	\$46,480 to <\$69,720	≥\$69,720
<i>Source: FFIEC.</i>				

### **Competition**

The AA reflects a moderate level of competition for financial services based on the AA’s population. According to the FDIC Deposit Market Share report as of June 30, 2022, 27 institutions operate 78 offices within the bank’s AA. Of these institutions, FBT ranked third with an 11.0 percent market share.

### **Credit and Community Development Needs and Opportunities**

Considering information obtained from bank management, as well as demographic and economic data, examiners concluded the primary credit needs of the AA include home mortgage and small business loans.

Regarding the area’s CD needs, demographic data shows 35.8 percent of the area’s families reported low or moderate incomes, which suggests a need for activities that provide community services to these families. Additionally, demographic data reflecting only 19.1 percent of the AA’s businesses operate in low- or moderate- income census tracts suggests a CD need for economic development in these areas of the AA.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA NON-MSA AA**

### **LENDING TEST**

FBT demonstrated a satisfactory record regarding the Lending Test in the Oklahoma Non-MSA AA. Reasonable records regarding geographic distribution and borrower profile support this conclusion.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the Oklahoma Non-MSA AA. Reasonable performance regarding home mortgage lending outweighs poor performance regarding small business lending to support this conclusion.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Reasonable performance in low- and moderate-income census tracts supports this conclusion. The following table shows that the bank did not originate loans in low-income census tracts; however, this falls only slightly below aggregate performance of 0.6 percent and evidences reasonable performance. The bank’s level of lending in moderate-income census tracts falls below aggregate performance by 3.8 percentage points, yet remains within a reasonable range.

Geographic Distribution of Home Mortgage Loans Oklahoma Non-MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	0.2	0.6	0	0.0	0	0.0
Moderate	12.5	12.0	15	8.2	1,996	12.0
Middle	53.9	46.4	120	65.6	9,135	55.0
Upper	33.4	41.1	48	26.2	5,474	33.0
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>16,605</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2021 HMDA LAR and Aggregate Data. Due to rounding, totals may not equal 100.0.*

### ***Small Business Loans***

The geographic distribution of small business loans reflects poor dispersion throughout the AA. Poor performance in moderate-income census tracts outweighs reasonable performance in low-income census tracts to support this conclusion. The following table shows that the bank did not originate loans in low-income census tracts. However, this reflects reasonable performance when considering the demographic data shows only 2.6 percent of businesses are located in these tracts. The bank's level of lending in moderate-income census tracts falls 9.0 percentage points below demographic data, reflecting poor performance. Examiners placed more weight on performance in moderate-income census tracts due to the increased opportunity to lend given the larger percentage of businesses located in these tracts.

Geographic Distribution of Small Business Loans Oklahoma Non-MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	2.6	0	0.0	0	0.0
Moderate	16.5	10	7.5	474	5.4
Middle	39.8	68	51.1	6,220	70.2
Upper	40.0	55	41.4	2,163	24.4
Not Available	1.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>133</b>	<b>100.0</b>	<b>8,857</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data. Due to rounding, totals may not equal 100.0.*

### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes. Reasonable home mortgage and small business lending performance supports this conclusion.

### ***Home Mortgage Loans***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. Reasonable records to low- and moderate-income borrowers support this conclusion. The following table shows the bank's level of lending to low-income borrowers rises above aggregate

performance by 7.9 percentage points, reflecting reasonable performance. The bank’s level of lending in moderate-income census tracts rises above aggregate performance by 9.0 percentage points, yet remains within a reasonable range.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Oklahoma Non-MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	19.2	3.0	20	10.9	1,052	6.3
Moderate	17.3	11.2	37	20.2	2,414	14.5
Middle	19.3	15.6	36	19.7	2,485	15.0
Upper	44.2	43.3	72	39.3	7,985	48.1
Income Not Available	0.0	26.9	18	9.9	2,669	16.1
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>183</b>	<b>100.0</b>	<b>16,605</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2021 HMDA LAR and Aggregate Data. Due to rounding, totals may not equal 100.0.</i>						

***Small Business Loans***

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank originated more than seven out of every ten small business loans to businesses with gross annual revenue of \$1 million or less, evidencing reasonable performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Oklahoma Non-MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
< \$100,000	64.7	35	36.8	2,153	33.6
\$100,000 - \$249,999	15.4	24	25.3	831	13.0
\$250,000 - \$499,999	4.7	8	8.4	195	3.0
\$500,000 - \$1,000,000	2.4	4	4.2	505	7.9
<b>Subtotal ≤ \$1,000,000</b>	<b>87.2</b>	<b>71</b>	<b>74.7</b>	<b>3,684</b>	<b>57.5</b>
> \$1,000,000	3.2	7	7.4	1,641	25.6
Revenue Not Available	9.5	17	17.9	1,080	16.9
<b>Total</b>	<b>100.0</b>	<b>95</b>	<b>100.0</b>	<b>6,405</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data; 2022 Bank Data. Due to rounding, totals may not equal 100.0.</i>					

**COMMUNITY DEVELOPMENT TEST**

FBT demonstrated a satisfactory record regarding the Community Development Test in the Oklahoma Non-MSA AA. The institution’s CD performance demonstrates adequate responsiveness to CD needs in the AA through CD loans, CD services, and QIs, as appropriate considering the institution’s capacity and the need and availability of such opportunities for CD in the institution’s AA.

### **Community Development Loans**

As reflected in the table at the institution level, the bank originated 12 CD loans totaling \$47.0 million in the Oklahoma Non-MSA AA. This reflects a significant increase in dollar volume from the 22 CD loans totaling approximately \$2.4 million at the previous evaluation. The current dollar amount equates to 51.7 percent of the institution's total CD loans compared to this area generating 58.3 percent of total loans.

The following lists an example of a CD loan in the Oklahoma Non-MSA AA.

- ***Economic Development*** – In 2022, the bank originated a \$14.2 million loan for the construction of a shopping center complex in a moderate-income census tract. The shopping center supports the community by providing jobs to low- and moderate-income individuals in the area.

### **Qualified Investments**

As reflected previously at the institution level, the bank made use of 65 QIs totaling \$430,000 in the Oklahoma Non-MSA AA. This reflects a slight increase in number, but a decrease in dollar volume from the 58 QIs totaling \$602,000 reported in the prior evaluation. The total dollar amount represents 31.9 percent of the bank's QIs inside its AAs and 14.4 percent of the bank's total QIs. As noted, this AA contained 81.0 percent of the bank's total deposits.

The following lists an example of a QI in the Oklahoma Non-MSA AA.

- ***Community Services*** – The bank made an \$185,000 investment in school bonds in a Payne County school district primarily serving low- or moderate-income individuals since a majority of students receive free and/or reduced lunches.

### **Community Development Services**

As reflected previously at the institution level, the bank provided 43 CD services in the Oklahoma Non-MSA AA. This reflects a decrease from the 90 CD services in this AA noted at the prior evaluation. This current level represents 81.1 percent of the bank's total CD services, while this AA contains 58.3 percent of the bank's total branches.

The following lists an example of a CD service in the Oklahoma Non-MSA AA.

- ***Economic Development*** – A bank employee serves on the Board of a local economic development organization that benefits low- and moderate-income areas of the city.

FBT operates one branch and one ATM in a moderate-income census tract in this AA. The alternative delivery systems in the Oklahoma Non-MSA AA remain consistent with that discussed at the institution level.

## OKLAHOMA CITY MSA AA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN OKLAHOMA CITY MSA AA

The Oklahoma City MSA AA includes all of Cleveland, Lincoln, and Oklahoma counties, which represent three of the seven counties that comprise the Oklahoma City MSA in central Oklahoma. This reflects a change since the previous evaluation with the addition of Lincoln County to the AA due to the acquisition of the Wellston and Stroud branches of Stroud National Bank. This AA also includes 35 additional census tracts, which includes a decrease of two moderate-income census tracts, since the prior evaluation due to changes resulting from the 2020 U.S. Census Data. The bank operates five full-service locations and five ATMs in this AA. The branches maintain hours consistent with the area and the industry. The delivery systems and range of products and services remain consistent with those reflected in the overall Description of Institution Section of this performance evaluation.

#### Economic and Demographic Data

Based on 2020 U.S. Census Data, the AA’s 345 census tracts include the following income designations: 28 low-, 95 moderate-, 116 middle-, and 87 upper-income census tracts, as well as 19 census tracts without an income designation. The following table provides select demographic characteristics for this AA.

<b>Demographic Information of the Assessment Area Oklahoma City MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	345	8.1	27.5	33.6	25.2	5.5
Population by Geography	1,125,278	6.8	25.6	36.9	28.7	1.9
Housing Units by Geography	472,954	7.0	27.5	37.7	26.1	1.7
Owner-Occupied Units by Geography	261,642	4.2	21.2	39.0	34.5	1.1
Occupied Rental Units by Geography	165,230	10.3	35.5	36.5	15.2	2.5
Vacant Units by Geography	46,092	11.1	35.2	34.2	16.9	2.5
Businesses by Geography	168,884	5.1	23.3	33.2	35.6	2.7
Farms by Geography	4,453	4.0	23.8	34.6	36.3	1.3
Family Distribution by Income Level	266,026	22.4	17.9	20.2	39.5	0.0
Household Distribution by Income Level	426,872	24.8	17.0	18.4	39.8	0.0
Median Family Income – OK Non-MSA	\$75,170		Median Housing Value			\$160,866
			Median Gross Rent			\$911
			Families Below Poverty Level			10.5%

*Source: 2020 U.S. Census Data and 2022 D&B Data. Due to rounding, totals may not equal 100.0.  
(\*) The NA category consists of geographies that have not been assigned an income classification.*

FEMA made disaster declarations affecting all AA counties on December 21, 2020, due to severe ice storms and on February 24, 2021, due to severe winter storms. According to Moody’s Analytics, the Oklahoma City MSA AA’s largest employers include Tinker Air Force Base, University of Oklahoma – Norman, Integris Health, University of Oklahoma Health Sciences Center, and FAA Mike Monroney Aeronautical Center. The following table shows annual unemployment rates over the evaluation period for the AA, State of Oklahoma, and nationwide, which show a decline since to COVID-19 pandemic in 2020.

<b>Unemployment Rates</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
	<b>%</b>	<b>%</b>	<b>%</b>
Cleveland County	4.2	2.0	2.1
Lincoln County	4.8	2.3	2.7
Oklahoma County	5.2	2.4	2.6
State of Oklahoma	5.1	2.5	2.6
National Average	6.7	3.9	3.5

*Source: Bureau of Labor Statistics.*

Examiners used the applicable FFIEC-updated median family income levels to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle-, and upper-income ranges based on the 2021 FFIEC-updated median family income of \$73,100 for the Oklahoma City MSA.

<b>Median Family Income Ranges – Oklahoma City, OK MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2021 (\$73,100)	<\$36,550	\$36,550 to <\$58,480	\$58,480 to <\$87,720	≥\$87,720

*Source: FFIEC.*

**Competition**

The AA reflects a relatively low level of competition for financial services based on the AA’s population. According to the FDIC Deposit Market Share report as of June 30, 2022, 67 institutions operate 314 offices within the bank’s AA. Of these institutions, FBT ranked 41<sup>st</sup> with a 0.3 percent deposit market share. However, mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level.

**Community Contact**

As part of the evaluation process, examiners obtain information from third parties knowledgeable of the AA to assist in identifying needs of the area. This information helps determine financial institutions’ responsiveness to these needs and shows available credit and CD opportunities. Examiners utilized a community contact from an economic development organization knowledgeable of the area’s business environment to help assess the area’s current economic conditions, community credit needs, and potential opportunities for bank involvement. The contact stated loans for housing, small businesses, and start-ups represent the main credit needs in the area. The contact also stated that high interest rates affect borrowers’ abilities to obtain

financing. The contact indicated financial institutions remain actively involved and willing to work with small businesses and other borrowers throughout the area.

### **Credit and Community Development Needs and Opportunities**

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners concluded the primary credit needs of the AA include small business and home mortgage loans.

Regarding the area's CD needs, demographic data shows 40.3 percent of the area's families reported low or moderate incomes, which suggests a significant need for activities that provide community services to these families. Additionally, demographic data reflecting only 28.4 percent of the AA's businesses operate in low- or moderate-income census tracts suggests a CD need for economic development in these areas.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA CITY MSA AA**

### **LENDING TEST**

The bank demonstrated a satisfactory record regarding the Lending Test in the Oklahoma City MSA AA. A reasonable borrower profile outweighs a poor geographic distribution to support this conclusion.

### **Geographic Distribution**

The geographic distribution of loans reflects poor dispersion throughout the Oklahoma City MSA AA. Poor performance regarding small business lending outweighs reasonable performance regarding home mortgage lending to support this conclusion.

### ***Small Business Loans***

The geographic distribution of small business loans reflects poor dispersion throughout the AA. Poor performance in moderate-income census tracts outweighs reasonable performance in low-income census tracts to support this conclusion. The following table shows that the bank's lending in low-income census tracts is comparable to demographic data, reflecting reasonable performance. However, the bank's level of lending in moderate-income census tracts falls 14.4 percentage points below demographic data, reflecting poor performance. Examiners placed more weight on performance in moderate-income census tracts given the greater opportunity to lend due to the larger percentage of businesses located in these tracts.

<b>Geographic Distribution of Small Business Loans Oklahoma City MSA AA</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	5.1	4	5.1	440	3.4
Moderate	23.3	7	8.9	450	3.5
Middle	33.2	47	59.5	5,369	42.1
Upper	35.6	21	26.5	6,503	51.0
Not Available	2.7	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>79</b>	<b>100.0</b>	<b>12,762</b>	<b>100.0</b>
<i>Source: 2022 D&amp;B Data; 2022 Bank Data. Due to rounding, totals may not equal 100.0.</i>					

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Reasonable performance in low- and moderate-income census tracts supports this conclusion. The following table shows that the bank’s level of lending in low-income census tracts only slightly trails aggregate performance by 0.6 percentage points, reflecting reasonable performance. The bank’s level of lending in moderate-income census tracts falls below aggregate performance by 2.6 percentage points, also reflecting reasonable performance.

<b>Geographic Distribution of Home Mortgage Loans Oklahoma City MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	4.2	2.4	1	1.8	128	1.0
Moderate	20.9	15.3	7	12.7	1,190	9.6
Middle	39.4	34.1	21	38.2	2,369	19.2
Upper	35.4	48.0	26	47.3	8,676	70.2
Not Available	0.1	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>12,363</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2021 HMDA LAR and Aggregate Data. Due to rounding, totals may not equal 100.0.</i>						

### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes. Reasonable home mortgage and small business lending performance supports this conclusion.

### ***Small Business Loans***

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. As shown in the following table, the bank originated more than six out of every ten small business loans to businesses with gross annual revenue of \$1 million or less, reflecting reasonable performance.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category Oklahoma City MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
< \$100,000	72.3	11	22.9	154	2.0
\$100,000 - \$249,999	13.8	7	14.6	967	12.4
\$250,000 - \$499,999	3.3	5	10.4	1,674	21.5
\$500,000 - \$1,000,000	1.8	7	14.6	1,841	23.7
<b>Subtotal ≤ \$1,000,000</b>	<b>91.2</b>	<b>30</b>	<b>62.5</b>	<b>4,636</b>	<b>59.6</b>
> \$1,000,000	2.5	14	29.2	1,764	22.7
Revenue Not Available	6.2	4	8.3	1,373	17.7
<b>Total</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>7,773</b>	<b>100.0</b>

*Source: 2022 D&B Data; 2022 Bank Data. Due to rounding, totals may not equal 100.0.*

### **Home Mortgage Loans**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. Reasonable performance to low-income borrowers outweighs poor performance to moderate-income borrowers to support this conclusion. The following table shows the bank’s level of lending to low-income borrowers slightly exceeds aggregate performance by 0.6 percentage points, reflecting reasonable performance. The bank’s level of lending to moderate-income borrowers falls below aggregate performance by 12.2 percent, reflecting poor performance. Given the slightly larger percentage of families considered low-income as represented by the demographic data, the analysis placed more weight on lending to low-income borrowers when arriving at an overall conclusion.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Oklahoma City MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	22.8	4.9	3	5.5	369	3.0
Moderate	17.5	14.0	1	1.8	28	0.2
Middle	20.0	16.7	10	18.2	1,076	8.7
Upper	39.8	33.4	23	41.8	5,479	44.3
Income Not Available	0.0	31.0	18	32.7	5,411	43.8
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>12,363</b>	<b>100.0</b>

*Source: 2015 ACS Data; 2021 HMDA LAR and Aggregate Data. Due to rounding, totals may not equal 100.0.*

### **COMMUNITY DEVELOPMENT TEST**

FBT demonstrated a satisfactory record regarding the Community Development Test in the Oklahoma City MSA AA. The institution’s CD performance demonstrates adequate responsiveness to CD needs in the Oklahoma City MSA AA through CD loans, CD services, and QIs, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for CD in the institution’s AA.

## **Community Development Loans**

As reflected in the table at the institution level, the bank originated 10 CD loans totaling \$32.7 million in the Oklahoma City MSA AA. This reflects a decrease from the 19 CD loans totaling approximately \$43.6 million at the previous evaluation. The current dollar amount equates to 36.0 percent of the institution's total CD loans compared to this area generating 41.7 percent of total loans.

The following lists an example of a CD loan in the Oklahoma City MSA AA.

- ***Economic Development*** – In 2023, the bank originated a \$2.6 million loan to construct a convenience store in a low-income census tract. The store supports the community by providing jobs to low- and moderate-income individuals in the area.

## **Qualified Investments**

As reflected previously at the institution level, the bank made use of 16 QIs totaling \$916,000 in this AA. This reflects a significant increase in dollar volume from the 16 QIs totaling \$10,000 reported in the prior evaluation. The total dollar amount represents 68.1 percent of the bank's QIs inside its AAs and 30.7 percent of the bank's total QIs. As noted, this AA contained 19.0 percent of the bank's total deposits.

The following lists an example of a QI in the Oklahoma City MSA AA.

- ***Community Services*** – The bank made a \$75,000 investment in bonds for a Cleveland County emergency medical services district, where the community is comprised of approximately 60 percent low- and moderate-income individuals.

## **Community Development Services**

As reflected previously at the institution level, the bank provided 10 CD services in the Oklahoma City MSA AA. This reflects a decrease from the 36 CD services in this AA noted at the prior evaluation. This current level represents 18.9 percent of the bank's total CD services, while this AA contains 41.7 percent of the bank's total branches.

The following lists an example of a CD service in the Oklahoma City MSA AA.

- ***Community Service*** – Bank employees taught financial literacy classes at a school that primarily benefits low- or moderate-income individuals since a majority of students receive free or reduced lunches.

FBT operates one branch and one ATM in a moderate-income census tract in the AA. The alternative delivery systems in the Oklahoma City MSA AA remain consistent with that discussed at the institution level.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is 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.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

**Rated Area:** A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

## BRANCHES

## Banking Center and ATM Locations with Hours of Operation

<u>Location/Hours</u>	<u>Address/County</u>	<u>Census Tract</u>
<b><i>Duncan Main Banking Center</i></b>		
923 W. Main St, Duncan, Stephens, OK Hours Lobby: M-F 9AM - 4PM		0003.00
<b><i>Plato Banking Center</i></b>		
1521 W. Plato Rd, Duncan, Stephens, OK (Branch and ATM) Hours Lobby: M-F 9AM- 5PM Drive-Thru: M-F 8AM- 6PM, Sat 8AM-12PM ATM 24 hours a day/7 days a week (Deposit taking)		0002.00
<b><i>Duncan Motor Bank</i></b>		
1001 Oak, Duncan, Stephens, OK (Drive In and ATM) Hours: M-F 8AM- 6PM, Sat 8AM-12PM ATM 24 hours a day/7 days a week (Deposit taking)		0003.00
<b><i>Ardmore Main Banking Center</i></b>		
301 W. Main, Ardmore, Carter, OK (Branch and ATM) Hours Lobby: M-F 9AM-4PM Drive-Thru: M-F 8AM- 6PM ATM 24 hours a day/7 days a week (Deposit taking)		8929.00
<b><i>Ardmore West Banking Center</i></b>		
1720 McLish, Ardmore, Carter, OK (Branch and ATM) Hours Lobby: M-F 9AM-4PM Drive-Thru: M-F 8AM- 6PM, Sat 8 AM-12PM ATM 24 hours a day/7 days a week (Deposit taking)		8930.02
<b><i>Healdton Banking Center</i></b>		
11098 Hwy 76, Healdton, Carter, OK (Branch and ATM) Hours Lobby: M-Th 9AM - 3PM, F 9AM-4PM Drive Thru: M-F 8AM-6PM, Sat 8AM-12PM ATM 24 hours a day/7 days a week (Deposit taking)		8923.02
<b><i>Norman Banking Center</i></b>		
2330 36th Ave NW, Norman, Cleveland, OK (Branch and ATM) Hours Lobby: M-F 9AM-5PM Drive-Thru: M-F 9AM- 5PM ATM 24 hours a day/7 days a week (Deposit taking)		2015.05

<b>Norman East Banking Center</b>	
2400 Alameda, Norman, Cleveland, OK (Branch and ATM)	2014.05
Hours Lobby: M-F 9AM-5PM	
Drive-Thru: M-F 9AM- 5PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Waurika Banking Center</b>	
101 N Main, Waurika, Jefferson, OK (Branch and ATM)	3718.00
Hours Lobby: M-Th 9AM-3PM, F 9:00AM-6PM	
Drive Thru: M-Th 8AM-4:30PM, F 8AM-6PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Duncan ATM</b>	
1206 N Highway 81, Duncan, Stephens, OK (ATM)	0002.00
Hours 24 hours a day/7 days a week (Deposit taking)	
<b>OKC/Edmond Banking Center</b>	
3805 W. Memorial Rd, Oklahoma City, Oklahoma, OK (Branch and ATM)	1085.34
Hours Lobby: M-F 9AM-5PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Stroud Banking Center</b>	
300 W. Main, Stroud, Lincoln, OK (Branch and ATM)	9611.00
Hours Lobby: M-F 9AM-4PM	
Drive Thru: M-F 8AM-5:30PM, Sat 8AM-12PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Wellston Banking Center</b>	
215 Second St, Wellston, Lincoln, OK (Branch and ATM)	9613.00
Hours Lobby: M-F 9AM-4PM	
Drive Thru: M-Th 8AM-4PM, F 8AM-5:30PM, Sat 8AM-12PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Perkins Banking Center</b>	
830 N. Main St, Perkins, Payne, OK (Branch and ATM)	0111.04
Hours Lobby: M-F 9AM-4PM	
Drive Thru: M-F 8AM-5:30PM, Sat 8AM-12PM	
ATM 24 hours a day/7 days a week (Deposit taking)	
<b>Lindsay Banking Center</b>	
101 S. Main St. Lindsay, Garvin, OK (Branch and ATM)	6818.00
Hours Lobby: M-F 9AM-3PM, F 9AM-5:30PM	
Drive Thru: M-Th 8AM-5PM, F 8AM-5:30PM	
ATM 24 hours a day/7 days a week (Deposit taking)	

## BRANCHES OPENED OR CLOSED

## LIST OF BRANCH OPENING & CLOSING

<b>YUKON LIMITED</b> 11221 W Reno Ave. Suite 100, Yukon OK 73099	<b>OPENED FEBRUARY 2015</b> 36420/40/017/3010.03
<b>EDMOND LIMITED</b> 2216 NW 164th St, Edmond, OK 73013	<b>OPENED JANUARY 2016</b> 36420/40/109/1083.16
<b>ARDMORE EAST</b> 1321 Sam Noble Pkwy, Ardmore, OK 73401	<b>CLOSED MAY 2015</b> NA/40/019/8926.00
<b>YUKON LIMITED</b> 11221 W Reno Ave. Suite 100, Yukon OK 73099	<b>CLOSED NOVEMBER 2018</b> 36420/40/017/3010.03
<b>STROUD</b> 300 W Main St, Stroud, Lincoln, OK 74079	<b>OPENED JUNE 2021</b> 36420/40/081/9611.00
<b>WELLSTON</b> 215 Second St, Wellston, Lincoln, OK 74881	<b>OPENED JUNE 2021</b> 36420/40/081/9613.00
<b>PERKINS</b> 830 N. Main St, Perkins, Payne, OK 74059	<b>OPENED JUNE 2021</b> NA/40/119/0111.04
<b>EDMOND LIMITED</b> 2216 NW 164th St, Edmond, OK 73013	<b>CLOSED JANUARY 2022</b> 36420/40/109/1083.16
<b>EDMOND/OKC BANKING CENTER</b> 3805 W. Memorial Rd, Edmond, OK 73134	<b>OPENED JANUARY 2022</b> 36420/40/109/1085.34
<b>LINDSAY</b> 101 S. Main St. Lindsay, OK 73052	<b>OPENED OCTOBER 2024</b> NA/40/049/6818.00

### Current location Listings

Facility Address	Type of Branch	Census Tract	Lobby Hours	Drive Thru Hours
923 W. Main St, Duncan, Stephens, OK	Main Branch	0003.00	9-4 M-F	N/A
1001 W. Oak, Duncan, Stephens, OK	Drive in and ATM	0003.00	N/A	8-6 M-F, 8-12 Sat
1206 N Highway 81, Duncan, Stephens, OK	ATM Only	0002.00	24- 7	N/A
1521 W. Plato Rd, Duncan, Stephens, OK	Branch and ATM	0002.00	9-5 M-F	8-6 M-F, 8-12 Sat
11098 Hwy 76, Healdton, Carter, OK	Branch and ATM	8923.02	9-3 M-TH, 9-4 F	8-6 M-F, 8-12 Sat
301 W. Main, Ardmore, Carter, OK	Branch and ATM	8929.00	9-4 M-F	8-6 M-F
1720 McLish, Ardmore, Carter, OK	Branch and ATM	8930.02	9-4 M-F	8-6 M-F, 8-12 Sat
2330 36 <sup>th</sup> Ave NW, Norman, Cleveland, OK	Branch and ATM	2015.05	9-5 M-F	9-5 M-F
2400 Alameda, Norman, Cleveland, OK	Branch and ATM	2014.05	9-5 M-F	9-5 M-F
101 N Main, Waurika, Jefferson, OK	Branch and ATM	3718.00	9-3 M-Th, 9-6 F	8-4:30 M-Th, 8-6 F
3805 W. Memorial Rd. Oklahoma City, Oklahoma, OK	Branch and ATM	1085.34	9-5 M-F	N/A
300 W Main St, Stroud, Lincoln, OK	Branch and ATM	9611.00	9-4 M-F	8-5:30 M-F, 8-12 Sat
215 Second St, Wellston, Lincoln, OK	Branch and ATM	9613.00	9-4 M-F	8-4 M-Th, 8-5:30 Fri, 8-12 Sat
830 N. Main St, Perkins, Payne, OK	Branch and ATM	0111.04	9-4 M-F	8-5:30 M-F, 8-12 Sat
101 S. Main St. Lindsay, Garvin, OK	Branch and ATM	6818.00	9-3 M-Th, 9-5:30 F	8-5 M-Th, 8-5:30 F

## SERVICES AND FEES



## PRODUCTS AND SERVICES

### Introduction

The welfare and growth of each team member is in direct proportion to the welfare and growth of the Bank. How successful we are in this depends on how serious we are in accepting responsibility for attracting new business and extending a kind of personal attention that encourages present and prospective customers to increase their business with the bank.

Remember personal growth and welfare can come only after we have been successful in obtaining new business and improving our service to our present customers. Be enthusiastic about your bank! *Know what you have to offer and how it serves the customer and be proud to ask for business.*

The purpose of this information is to provide each team member with the knowledge of each First Bank product and service to continue to provide exceptional customer service to each of our existing and potential customers.

## Deposit Products

### Types of Deposit Accounts

First Bank & Trust Co. offers both personal and commercial, or business, deposit accounts. The differences between these are the purpose of the account, the attributes of the account and the stipulations of the account, all of which will determine the disclosures that are required to be given on each account.

Deposit accounts may consist of non-interest bearing (demand deposit) checking accounts, and interest bearing (NOW) checking accounts, savings accounts, MMDA (money market) accounts, CD (certificate of deposit) accounts, and IRA (individual retirement) accounts.

**Note:** Anytime interest rates are discussed with at a customer or potential customer, the annual percentage yield (APY) must be disclosed in conjunction with the rate.

## Checking Accounts

### Personal/Consumer Checking Accounts

#### 1. *First Freedom*

- \$100 deposit to open account
- No monthly service charge
- No minimum balance required
- Unlimited check writing ability
- Customer purchases checks
- Free electronic statements or paper statements available for \$2 monthly fee
  - Fronts of check images duplex printed 18 to each page included in monthly statements
- Overdraft Privilege – Limit \$500
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

#### 2. *First Class*

- \$100 deposit to open account
- \$8.00 monthly service charge
- First Bank's custom image wallet checks at no charge
- No minimum balance required
- Unlimited check writing ability
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page are included in each monthly statement
- Overdraft Privilege – Limit \$800
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

3. *First Class Plus*

- **For Customers age 62 or older**
- \$100 deposit to open account
- No monthly service charge
- First Bank’s custom image wallet checks at no charge
- No minimum balance required
- Unlimited check writing ability
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page are included in each monthly statement
- Overdraft Privilege – Limit \$800
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

4. *First Rate – NOW*

**Only consumers may have this type of account, due to Reg D –NOW account eligibility requirements.**

- \$100 deposit to open account
  - Interest bearing – tiered rates and different in each market
- |           |           | <u>SE</u> | <u>Metro</u> | <u>SW</u> | <u>NE</u> |
|-----------|-----------|-----------|--------------|-----------|-----------|
| < \$10 K  | Rate Code | 600       | 700          | 800       | 399       |
| < \$25 K  | Rate Code | 601       | 701          | 801       | 401       |
| < \$250 K | Rate Code | 602       | 702          | 802       | 402       |
| < \$1 M   | Rate Code | 603       | 703          | 803       | 403       |
| > \$1 M   | Rate Code | 604       | 704          | 804       | 404       |
- Service charge is calculated based on the actual daily balance:
 

\$1,500 maintained	No monthly service charge
\$1,499 - \$0	\$9.00 monthly service charge
  - Unlimited check writing ability
  - Customer purchases checks
  - Free electronic statements or paper statements with images
    - Fronts of check images duplex printed 18 to each page included in monthly statements
  - Overdraft Privilege – Limit \$1,000
  - Overdraft Accrual Charge -- \$1.00 per business day
    - After being overdrawn 5 days by more than \$10.00

5. *First Advantage – NOW*

**Only consumers may have this type of account, due to Reg D –NOW account eligibility requirements.**

- \$100 deposit to open account
  - Interest bearing – tiered rates and different in each market
- |           |           | <u>SE</u> | <u>Metro</u> | <u>SW</u> | <u>NE</u> |
|-----------|-----------|-----------|--------------|-----------|-----------|
| < \$10 K  | Rate Code | 605       | 705          | 805       | 405       |
| < \$25 K  | Rate Code | 606       | 706          | 806       | 406       |
| < \$250 K | Rate Code | 607       | 707          | 807       | 407       |
| < \$1 M   | Rate Code | 608       | 708          | 808       | 408       |
| > \$1 M   | Rate Code | 609       | 709          | 809       | 409       |

- Service charge is calculated based on the actual daily balance of all of the customer's deposit accounts:
  - Must maintain \$10,000 total deposit relationship
  - If the total aggregate balance of their checking, savings and certificates of deposit falls below \$10,000 on any day of the statement cycle, \$12.00 will be imposed as a "charge based on the minimum balance"
- Unlimited check writing ability
- First Bank's custom image wallet checks at no charge
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements
- Overdraft Privilege – Limit \$1,000
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

#### 6. *First Hero*

**For Active and Retired: Military Personnel, Certified Law Enforcement, Firefighters, Licensed Educators, Licensed Healthcare Professionals and Registered Farmers and Ranchers.**

- \$100 deposit to open account
- No monthly service charge
- No minimum balance required
- Unlimited check writing ability
- First Bank's Forever Free checks wallet at no charge
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page are included in each monthly statement
- Overdraft Privilege – Limit \$1000
- No Foreign ATM fee (FB&T co. will not charge a fee for any ATM transactions, however a surcharge fee may apply from the owner of the ATM)
- Free Cashier's Checks
- Free Stop Payment Orders (including Electronic)
- Free 3x5 Safe Deposit Box for 1 year (upon availability)
- Free Consulting on Estate, Retirement, and Financial Planning through FB&T Co.'s Wealth Management Department
- Free Photocopy and Fax services
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

#### 7. *Group Plan Checking*

Restricted to employees of businesses that are participating in the Group Plan Checking program **THIS ACCOUNT IS NOT OFFERED TO EVERYONE.**

- \$100 deposit to open account
- No minimum balance required
- No monthly service charge
- Unlimited check writing ability
- Direct deposit of payroll checks required
- First Bank's custom image wallet checks at no charge

- Free electronic statements or paper statements available for \$2 monthly fee
- Fronts of check images duplex printed 18 to each page included in monthly statements
- \$15 Discount on stop payment fees
- Free 3x5 Safe Deposit Box for 1 year (upon availability)
- Overdraft Privilege – Limit \$800
- Overdraft Accrual Charge -- \$1.00 per business day
  - After being overdrawn 5 days by more than \$10.00

8. *HSA Checking (Health Savings Account)*

A Health Savings Account (HSA) is a special account owned by an individual where contributions to the account are to pay for current and future medical expenses.

HSA's are used in conjunction with a "High Deductible Health Plan"(HDHP).

- Service charge is calculated based on the actual daily balance:
 

\$3,000 maintained	No monthly service charge
\$2,999 - \$0	\$2.50 monthly service charge
- Interest bearing – tiered rates
 

Less than	\$ 5,000	Rate Code 40
Greater than	\$ 5,000	Rate Code 41
Greater than	\$10,000	Rate Code 42
- Unlimited check writing ability
  - 1<sup>st</sup> box (50) of Deluxe HSA checks provided at no charge

**Non-profit Organization Checking Account**

*Non-profit Checking*

(Group or business must have own tax ID number. Individual tax ID numbers cannot be used)

- \$100 deposit to open account
- No monthly service charge
- Customer purchases checks
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements

**Commercial Checking Accounts**

1. *Commercial Checking*

This account is designed for Corporations, Partnerships, and Limited Liability Companies. Sole Proprietorships may also have this type of account.

- \$100 deposit to open account
- \$6 monthly service charge
- \$.15 per debit item
- \$.025 per "On Us Item" deposited
- \$.056 per "Transit Item" deposited
- "Earned Credit Per \$100 Average Daily Balance", this credit can offset any

monthly service charges and fees

- **NOTE:** Credits earned cannot exceed service charges
- Overdrawn balances accrue a fee of \$4.00 per day they are overdrawn during the cycle, and are charged 18% APR on the overdrawn amount
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements

## 2. *Interest Commercial Checking - NOW*

**Only Sole Proprietorships may have this type of account, due to Reg D -NOW account eligibility requirements.**

- \$100 deposit to open account
- \$6 monthly service charge
- \$.15 per debit item
- \$.025 per “On Us Item” deposited
- \$.056 per “Transit Item” deposited
- Interest bearing – tiered rates
  - < \$10 K Rate Code 800
  - < \$25 K Rate Code 801
  - < \$250 K Rate Code 802
  - < \$1 M Rate Code 803
  - > \$1 M Rate Code 804
- Overdrawn balances accrue a fee of \$4.00 per day they are overdrawn during the cycle, and are charged 18% APR on the overdrawn amount
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements
- Overdraft Privilege – Limit \$1500

## 3. *Interest Commercial Checking - DDA*

This account is designed for Corporations, Partnerships, and Limited Liability Companies. **(No ODP on this account.)**

- \$100 deposit to open account
- \$6 monthly service charge
- \$.15 per debit item
- \$.025 per “On Us Item” deposited
- \$.056 per “Transit Item” deposited
- Interest bearing – tiered rates
  - < \$10 K Rate Code 800
  - < \$25 K Rate Code 801
  - < \$250 K Rate Code 802
  - < \$1 M Rate Code 803
  - > \$1 M Rate Code 804
- Overdrawn balances accrue a fee of \$4.00 per day they are overdrawn during the cycle, and are charged 18% APR on the overdrawn amount
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements

4. *Free Business Checking*

Any type of entity may have this type of account, but it is designed for smaller businesses with a low volume of transactions.

- \$100 deposit to open account
- No monthly service charge
- 200 “items” processed for free
- A charge of \$.25 per item will be imposed, if more than 200 items are processed during the statement cycle
  - This includes all debits, credits and deposited items
- Overdrawn balances accrue a fee of \$4.00 per day they are overdrawn during the cycle, and are charged 18% APR on the overdrawn amount
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements

5. *IOLTA (Interest On Lawyer Trust Account)*

This account is designed for attorneys to put their client’s funds in as required by the Oklahoma Bar Association. All interest earned on this account is forwarded to the Oklahoma Bar Foundation.

**Note:** The attorney/law firm must be a customer in order to have this account.

- No minimum balance
- Interest bearing – tiered rates
  - < \$10 K    Rate Code    50
  - < \$25 K    Rate Code    51
  - < \$250 K   Rate Code    52
  - < \$1 M     Rate Code    53
  - > \$1 M     Rate Code    54
  - Interest rates will match the highest rate offered for checking accounts
  - Interest is forwarded to Oklahoma Bar Foundation
- No monthly service charge
- Customer purchases checks
- Free electronic statements or paper statements with images
  - Fronts of check images duplex printed 18 to each page included in monthly statements

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## Savings Accounts

### Personal Savings Accounts

#### 1. *First Money Market (MMDA)*

- \$100 deposit to open account
  - Interest bearing – tiered rates and different in each market
- |           |           | <u>SE</u> | <u>Metro</u> | <u>SW</u> | <u>NE</u> |
|-----------|-----------|-----------|--------------|-----------|-----------|
| < \$10 K  | Rate Code | 615       | 715          | 815       | 415       |
| < \$25 K  | Rate Code | 616       | 716          | 816       | 416       |
| < \$250 K | Rate Code | 617       | 717          | 817       | 417       |
| < \$1 M   | Rate Code | 618       | 718          | 818       | 418       |
| > \$1 M   | Rate Code | 619       | 719          | 819       | 419       |
- Service charge is calculated based on the actual daily balance:
    - \$2,500 maintained No monthly service charge
    - \$2,499 - \$0 \$10.00 monthly service charge
  - Six (6) free debits per month, then \$10.00 for each additional debit
  - Free electronic statements or paper statements

#### 2. *First Savings*

- \$100 deposit to open account
- Interest bearing – tiered rates and different in each market

		<u>SE</u>	<u>Metro</u>	<u>SW</u>	<u>NE</u>
< \$10 K	Rate Code	610	710	810	410
< \$25 K	Rate Code	611	711	811	411
< \$250 K	Rate Code	612	712	812	412
< \$1 M	Rate Code	613	713	813	413
> \$1 M	Rate Code	614	714	814	414

- Three (3) free withdrawals per month then \$2 for each additional withdrawal, these fees will be assessed on a monthly basis
- Interest is compounded monthly and paid monthly
- Statements cycles on a quarterly basis
- Free electronic statements or paper statements

#### 3. *Education Club Savings*

- \$100 deposit to open account
- Account styled under the OK Uniform Transfers to Minor Act (UTMA)
- Once the account holder turns 18 the account needs to be restyled
- Interest bearing (Rate #108)
- Three (3) free withdrawals per month then \$2 for each additional withdrawal, these fees will be assessed on a monthly basis
- Interest is compounded monthly and paid monthly
- Statements cycles on a quarterly basis
- Free electronic statements or paper statements

#### 4. *Firststar Savers*

- Must be school age
- Must be styled two signatures required Minor Joint with Adult, and an

Indemnification & Guaranty Agreement must be signed

- No initial deposit required; First Bank & Trust will make first deposit of \$1; students have the ability to give a deposit to a School Volunteer each week during the school year on the school’s designated day, and the School Volunteer makes the deposit at the Bank. Students and parents may make deposits at any bank location as well.
- Child’s social security number is required
- Interest bearing (Rate #124)
- Three (3) free withdrawals per month then \$1 for each additional withdrawal, these fees will be assessed on a monthly basis
- Interest is compounded monthly and paid monthly
- Statements cycles on an annual basis
- Free electronic statements or paper statements

5. *First Investors*

This account has the same features as the Firststar Savers account. It just has a different name to distinguish the older students that are in middle school from the elementary students.

**Commercial Savings Accounts**

1. *Commercial Money Market (MMDA)*

This account has the same features and rates, as the consumer/personal MMDA (First MMDA).

- \$2,500 deposit to open account
  - Interest bearing – tiered rates and different in each market
- |           |           | <u>SE</u> | <u>Metro</u> | <u>SW</u> | <u>NE</u> |
|-----------|-----------|-----------|--------------|-----------|-----------|
| < \$10 K  | Rate Code | 615       | 715          | 815       | 415       |
| < \$25 K  | Rate Code | 616       | 716          | 816       | 416       |
| < \$250 K | Rate Code | 617       | 717          | 817       | 417       |
| < \$1 M   | Rate Code | 618       | 718          | 818       | 418       |
| > \$1 M   | Rate Code | 619       | 719          | 819       | 419       |
- Service charge is calculated based on the actual daily balance:
 

\$2,500 maintained	No monthly service charge
\$2,499 - \$0	\$10.00 monthly service charge
  - Six (6) free debits per month, then \$10.00 for each additional debit
  - Free electronic statements or paper statements

2. *Commercial Savings*

- \$250 deposit to open account
  - Interest bearing – tiered rates and different in each market
- |           |           | <u>SE</u> | <u>Metro</u> | <u>SW</u> | <u>NE</u> |
|-----------|-----------|-----------|--------------|-----------|-----------|
| < \$10 K  | Rate Code | 610       | 710          | 810       | 410       |
| < \$25 K  | Rate Code | 611       | 711          | 811       | 411       |
| < \$250 K | Rate Code | 612       | 712          | 812       | 412       |
| < \$1 M   | Rate Code | 613       | 713          | 813       | 413       |
| > \$1 M   | Rate Code | 614       | 714          | 814       | 414       |
- Service charge is calculated based on the actual daily balance:
 

\$250 maintained	No monthly service charge
\$249 - \$0	\$5.00 monthly service charge

- Three (3) free withdrawals per month then \$2 for each additional withdrawal
- Interest is compounded/paid monthly, service charges assessed monthly with quarterly statements
- Free electronic statements or paper statements

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## Certificates of Deposit & Individual Retirement Accounts

**Note:** Reg D requires early withdrawal penalties of at least seven days' interest, if the depositor makes a withdrawal from a CD "within six days after the date of deposit". The penalties used in this situation are mandatory and cannot be waived.

Exceptions to the six-day period early withdrawal penalties are:

- Death of the owner
- Judicial determination that the owner is incompetent
- Withdrawal of an automatically renewable CD within 10 days after its automatic renewal date

### Certificates of Deposit (CDs)

#### 1. Regular CDs

- \$1,000 minimum deposit
- Cannot add to until maturity
- Interest paid by check, deposited to checking or savings account or compounded
- Terms available:
 

1 Month	3 Month	6 Month	12 Month	18 Month
24 Month	30 Month	36 Month	48 Month	60 Month
- Auto-renewable
- Early withdrawal penalties:
 

90 day interest penalty	1 month – 12 month terms
180 day interest penalty	18 month – 30 month terms
365 day interest penalty	36 month – 60 month terms

#### 2. 24 Month First Choice CD

- \$2,500 minimum deposit
- Can add to at anytime (\$500 minimum), cannot more than double the original face value of the CD
- APY is tied to the regular 24 Month CD rate
- APY can be adjusted 1 time during the 2 year term
- Interest paid by check, deposited to checking or savings account or compounded
- Auto-renewable
- 180 day interest penalty for early withdrawal

## **Individual Retirement Accounts (IRAs)**

The IRA is funded at First Bank & Trust Co. by investing into one of the following IRA Certificates of Deposits:

### *1. Regular, ROTH, SEP or CESA IRA's*

- \$1,000 minimum deposit
- Cannot add to until maturity
- Terms available:
  - 12 Month
  - 24 Month
  - 36 Month
  - 48 Month
  - 60 Month
- APY is tied to the corresponding regular CD APY
- Interest paid by check, deposited to checking or savings account or compounded
- Auto-renewable
- Early withdrawal penalties (same as regular CD's):

90 day interest penalty	12 month term
180 day interest penalty	24 month term
365 day interest penalty	36 month – 60 month terms

### *2. 18 Month Variable IRA*

- Any IRA plan may have this product:
  - Regular
  - ROTH
  - SEP
  - CESA
- \$100 minimum deposit
- Can add to at anytime
- APY changes monthly
- APY is tied to FB&T's previous 6 Month CD rate plus 25 basis points
- Interest paid by check, deposited to checking or savings account or compounded
- Auto-renewable
- 180 day interest penalty for early withdrawal

### *3. 24 Month First Choice IRA*

- Any IRA plan may have this product:
  - Regular
  - ROTH
  - SEP
  - CESA
- \$2,000 minimum deposit
- Can add to at any time (\$500 minimum), cannot more than double the original face value of the CD
- APY is tied to the regular 24 Month CD rate
- APY can be adjusted 1 time during the 2 year term

- Interest paid by check, deposited to checking or savings account or compounded
- Auto-renewable
- 180 day interest penalty for early withdrawal

4. *60 Month Roth IRA*

- \$500 minimum deposit
- Can add to at anytime during the 5 year term (\$100 minimum)
- APY is tied to the FB&T 60 Month CD rate
- APY can be adjusted 2 times during the 5 year term
- Interest paid by check, deposited to checking or savings account or compounded
- Auto-renewable
- 365 day interest penalty for early withdrawal

## Loan Products and Services

### Types of Loans

There are three types of loans. They are consumer loans, real estate loans and commercial loans. Within these three types, First Bank & Trust offers a wide variety of products, as you will see in the following list.

#### **Consumer Loans**

Auto  
Boat  
R.V.  
Motorcycle  
Personal  
Dealer Paper  
Visa/MasterCard  
Overdraft Protection

#### **Real Estate Loans**

First Mortgage  
Additional Mortgage  
Raw Land  
Equi-Check (HELOC)

#### **Commercial Loans**

Equipment  
Commercial Real Estate  
Cattle/Livestock  
Accounts Receivable

### **Consumer Loans**

#### *1. Auto, Boat, R.V. and Motorcycle Loans*

- Rates vary based on credit history, banking relationship with FB&T, down payment, income, length of the loan, year of the vehicle.
- Term of these loans vary according to year model.

#### *2. Personal Loans*

- Basically for any reason - medical expenses, vacation, school, taxes..
- Personal loans can be secured or unsecured (signature loan)
- Secured loans can be secured by a CD or savings account
- Unsecured loans may require a co-maker or co-signer
- Rates vary by collateral and length of the loan

#### *2. Dealer (Paper) Program*

- The car is financed at the car dealership. These contracts are purchased by First Bank & Trust Co. The dealership faxes an application and a contract to the Bank. Then, a credit decision is made by the Bank.

4. *Overdraft Protection (ODP)*

- Coincides with a checking account
- Will advance in \$100 increments to cover insufficient checks to a depleted checking account balance
- The APR is variable (Prime plus 2.00%)

Example:      Check Balance \$ 75  
                  Check            \$130  
  \$(55)  
                  ODP Advance \$100  
                  New Balance \$ 45

**Real Estate Loans**

1. *First Mortgage Primary Residence*

- Purchase of home
- Refinance home
- Policy dictates at least 10% down, however, exceptions can be made

2. *Additional Mortgage*

- Loan can be made for any purpose
- Interest may be tax deductible
- Sometimes termed “Home Equity Loan”

3. *Equi-Check (HELOC)*

- Revolving Line of Credit
- Secured by home
- “Credit card” on the house
- Loan may be advanced, paid down and advanced again
- Sometimes called Home Equity Line of Credit (HELOC)

5. *Raw Land*

- Loan may be made for up to 65% of purchase or appraisal

**Fixed Rate Mortgage Loans**

VA, FHA and Conventional mortgage loans available. Please call Fixed Rate Mortgage Department for details.

## **Commercial Loans**

1. *Equipment*
2. *Commercial Real Estate Loans*
  - 80% of purchase or appraisal
  - Includes office building and rental property
3. *Cattle/Livestock*
  - Terms depend on type of cattle operation

## Commercial Services

### Cash Management

- Direct Deposit payroll – enter the employee financial information once and just change the dollar amount each time
- If their payroll software creates a NACHA file, no entry is necessary, just upload the file each time
- Initiate debits/credits from any of their accounts at other institutions
- Enter and submit domestic wire transfers
- Enter recurring ACH batches and wires so only minimal entry is needed
- Allows for dual security if needed
- Appoint multiple users each with unique login credentials
- Ability to designate each user’s capabilities such as accounts accessed, dollar amount, and time frame of access
- Setup Free of Charge
- ACH Origination Charges

Description	Charge Type	Fee
ACH Monthly Maintenance Fee	Monthly	\$25.00
ACH Initial Set-up Fee	One Time	<del>\$100</del> – WAIVED
ACH Per Entry Fee (Includes Pre-notes)	Per Occurrence	\$0.25
ACH Corrections/Reversals – Per Item	Per Occurrence	\$5.00
ACH Return Item Fee	Per Occurrence	\$5.00
EFTPS Monthly Maintenance Fee	Monthly	None
EFTPS Per Entry Fee	Per Occurrence	\$1.00
ACH Rules, Corporate edition	Annual	No Charge

- Domestic Wire Transfers - \$5.00 each

### Merchant Credit Card Services

- Allows business to process credit/debit cards in store or mobile with multiple methods of processing
- Processing Rate is based on customer’s average ticket amount and annual sales volume
- Allows merchants to accept and process Visa, MasterCard, Discover, and American Express transactions from their customers

### Remote Deposit

- Free of charge
- Allows business to process any type of check including corporate checks, consumer checks, cashier’s checks, third-party checks and money orders
- Checks deposited directly into your account from your office. No more daily trips to the bank or waiting in line. Simply scan the checks, review and approve the information, then click send!
- No charge for remote capture scanner
- Check scanner captures the front and back for the check, including the MICR line

information and dollar amount

- Checks are summarized and an electronic deposit ticket is prepared for review and approval
- Speeds up the availability of funds, improving cash flow
- Automates the process of creating deposit tickets

## Electronic Banking Services

### **Online banking (Internet Banking) (\*Requires internet access)**

Online banking free of charge [www.fb247.com](http://www.fb247.com)

- Can view recent history, transfer funds, make loan payments, check balances, view and print images and place stop pays

Online Banking Auto Enroll

- Gives customers the ability to enroll themselves in Electronic Banking for accounts to which they are an owner

Online Bill Pay free of charge for the first 15 items per statement cycle

- Set up one time or recurring payments
- Set up payees only once
- Pay a Person
- Online Bill Pay Items in excess of 15 per statement cycle - 50¢ per item

### **E-Statements**

- Free of charge
- Available within Online banking – no separate login
- Receive email notices when statements are ready
- Set up additional recipients

### **Mobile Banking (\*Requires internet access)**

- Bank online using your cell phone or mobile device
- Available for iPhone and Android
- Can view recent history transfer funds, make loan payments, check balances, view images, Online Bill Pay, view E-Statements

### **Mobile Deposit (\*Requires FB&T Co. Mobile App)**

Mobile Deposit is a mobile application that allows you to make a deposit by taking a picture of the front and back of the check with your mobile device.

- Free of charge (Message and Data rates may apply)
- Customer must meet qualifications to be enrolled
  - 1 month of Banking History
  - Account has had a monthly deposit and no returned items
  - No NSF History in the last 30 days
- Mobile Deposits can be made to any Checking, Savings or Money Market account with FB&T Co. in which the customer is an owner.
- Checks must be properly endorsed, including endorsing with “For Mobile Deposit Only”.
- Items NOT applicable for deposit may include but are not limited to:
  - 3rd party checks (i.e., checks not made payable to the owner(s) of the account)
  - Foreign checks
  - Bonds Returned or re-deposited items
  - Rebate checks
  - Money Orders
  - Checks requiring two signatures

### **Text Banking & Mobile Alerts**

Allows customers to receive alerts for specific accounts at designated times

- Daily and Monthly Balance Alerts
- Balance Threshold Alerts
- Transaction Alerts

### **Two-Way Text Banking**

Text bank commands to transact business on your account

- Receive Balance Information
- See Recent Account History
- Make Transfers

### **iPad App**

All of the same features and functions as our normal Mobile Banking App, but designed specifically for the iPad screen for better and more efficient navigation!

### **Mobile Wallet**

Allows users to make touch (NFC) payments at participating stores.

- Available for iPhone and Android
- Set up through wallet or pay app on phone (Ex. Apple Wallet/Apple Pay, Samsung Pay, Google Pay)
- Users can add multiple cards to utilize
- Uses a virtual account number in stores to keep customers information safe and secure

### **Bank to Bank Transfers - B2B (\*Access via website or Mobile Banking App)**

Transfer funds from one financial institution to another using your E-Banker

- Free of Charge (Data rates may apply)
- ACH Credits/Debits can be made into or from any Checking, Savings or Money Market account in which the customer is an owner.
- Users enroll and verify account with other bank
- Number of transactions and dollar limits apply

## Additional Services

### ATM/Check Card

- Must have checking account with Bank
- Can be used anywhere that accepts Visa credit for purchases
- Can be used at ATM machines for cash withdrawals
- No Monthly Fee
- PIN (Personal Identification Number) numbers are chosen by all card users or can be computer generated
  - PIN numbers are confidential - Bank has no record of any customer's PIN after their card is ordered
- Replacement cards are \$5.00
  - Fee is imposed when customer loses their card or wants to change their number.
  - Fee is waived if the card has had fraud or is no longer working (worn/broken)
- Foreign transaction fee of \$2.00
- Maximum daily withdrawal limits:
  - Consumer Cards - \$750 at ATM and \$1500 at point of sale
  - Business Cards - \$750 at ATM and \$2500 at point of sale
  - Withdrawal amount may be increased with officer approval and prior arrangements
- Non-customers are charged \$3.00 for using our ATM machines

### Automatic Funds Transfer (Internal from one account to another)

- Free of charge
- Customer must sign AFT Form
- Transfer dates can be specified (i.e., 1st and 15th of each month, etc.)

### Cashiers Checks

- Cashiers Check Fee

\$ 5.00	Customers
\$10.00	Non-customer
- Cannot put a Stop Pay for any reason until after 90 days from purchase date

### Coin Counter

- Free of charge
- Available at the following locations:

Duncan Main	Ardmore West	Stroud
Duncan 10 <sup>th</sup> St	Norman Main	Wellston
Duncan Plato	Norman	Perkins
Healdton	Alameda	Lindsay
Ardmore Main	Waurika	

### Collection Items

- No charge if item sent for collection is to be deposited into an FB&T account
- \$7.50 charge for items not deposited to a FB&T account or non-customers

### **Direct Deposit**

- The Bank receives and originates ACH
- Signed authorization need from customer
- No charge to the customer other than any applicable debit charge per deposit agreement for type of account held

### **First Line**

- 24 Hour touch tone banking
- Information on Checking and Money Market accounts, Savings accounts, Loans, and CD/IRA accounts
- Balance inquiries
- Funds transfers
- Rate and Product information
- Bank Credit Card menu
- Merchant Check Verification
- Toll free number 1-888-306-2265
- Must complete form to authorize accounts eligible for funds transfer
- Must choose a PIN number
- Will go Dormant after 60 days of no activity

### **Night Deposits**

- Zipper bags are \$3.00 each – Commercial customers receive their first zipper bag free.
- Lock bags are \$25.00 each
- Night deposits are located at:

Duncan Main	Ardmore West	Waurika
Duncan Plato	Norman Main	Stroud
Healdton	Norman	Wellston
Ardmore Main	Alameda	Perkins
		Lindsay

### **Notary Public**

#### Authorized

- Free of charge
- Must be performed by a certified Notary Public
- Individual must present some form of identification (picture ID with signature and description of individual, or be positively identified by another known individual)

### **Overdraft Privilege**

Designed to be a safety net to prevent checks and ACH items from being returned. This is a Discretionary Service and can be removed if account does not remain in good standing,

- Funds may be accessed via ATM and POS
- Fee \$30 per overdraft item (whether paid or returned)
- Consumers must “Opt-In” to utilize ODP Limits using ATM Withdrawals & one-time POS transactions

- Limits are set by account type:

\$500	First Freedom		
\$800	First Class	First Class Plus	Group Plan
\$1000	First Advantage	First Rate	First Hero
\$1500	Interest Commercial	(Sole Proprietors only)	

- Ineligible Accounts

Entities	Public Funds	Charitable
Savings	Trusts	Organizations
MMDA	Fiduciary	

Fresh Start is a repayment plan for the negative balance of an account due to Overdraft Privilege items paid and Overdraft Privilege fees charged

- An account must have had Overdraft Privilege to be eligible for Fresh Start
- Negative balance due to NSF items and fees are excluded from the program
- Negative balance should be greater than \$100
- Repayment period is 4 to 6 months
  - If the negative amount is a large amount customer should discuss the possibility of a loan to repay the balance with the account officer
- Customers have 10 days to make a payment before entering a charged off status

**Safe Deposit Box Rental**

Duncan/Healdton/Ardmore/Norman/Waurika

2x5 Box	\$25.00 Annually
3x5 Box	\$30.00 Annually
5x5 Box	\$40.00 Annually
3x10 Box	\$50.00 Annually
4x10 Box	\$60.00 Annually
5x10 Box	\$70.00 Annually
10x10 Box	\$100.00 Annually
10x14 Box	\$150.00 Annually
Locker	\$360.00 Annually

<b><u>Banking Center</u></b>	<b><u>2x5</u></b>	<b><u>3x5</u></b>	<b><u>5x5</u></b>	<b><u>3x10</u></b>	<b><u>4x10</u></b>	<b><u>5x10</u></b>	<b><u>10x10</u></b>	<b><u>10x14</u></b>	<b><u>Locker</u></b>
Duncan Main		X	X	X		X	X		
Duncan Plato				X		X	X		
Healdton	X	X		X		X	X		
Ardmore Main		X		X		X	X	X	X
Norman Main				X		X	X		
Norman Alameda						X	X		
Waurika		X	X	X		X	X		

Stroud/Wellston/Perkins

3x5 Box	\$15.00 Annually
5x5 Box	\$25.00 Annually
3x10 Box	\$30.00 Annually
4x10 Box	\$33.00 Annually
5x10 Box	\$40.00 Annually
10x10 Box	\$70.00 Annually

<b><u>Banking Center</u></b>	<b><u>2x5</u></b>	<b><u>3x5</u></b>	<b><u>5x5</u></b>	<b><u>3x10</u></b>	<b><u>4x10</u></b>	<b><u>5x10</u></b>	<b><u>10x10</u></b>	<b><u>10x14</u></b>	<b><u>Locker</u></b>
Stroud		X	X	X	X	X	X		
Wellston		X	X	X	X	X	X		
Perkins		X		X		X	X		

Lindsay

3x5 Box	\$10.00 Annually
5x5 Box	\$18.00 Annually
3x10 Box	\$20.00 Annually
4x10 Box	\$25.00 Annually
5x10 Box	\$40.00 Annually
12x10 Box	\$50.00 Annually

<b><u>Banking Center</u></b>	<b><u>3x5</u></b>	<b><u>5x5</u></b>	<b><u>3x10</u></b>	<b><u>4x10</u></b>	<b><u>5x10</u></b>	<b><u>12x10</u></b>
Lindsay	X	X	X	X	X	X

- There is \$15.00 key deposit
- Two keys issued at time box is rented
- Two keys must be returned when box is closed out
- If one key is lost or stolen, a \$15.00 charge is assessed to replace the key
- If both keys are lost there is a \$100.00 charge to bust/drill the box
- Customer has access to box during lobby hours only

Sweeps

- Free of Charge
- Have funds sweep from one account to another, based on the balance specified by the customer
- Customer must sign Sweep Form

Visa® Gift Cards

- \$5.00 per card
  - Free to employees
- Cards can be loaded with amounts from \$20.00 - \$750.00
- Customer cannot purchase more than 10 cards in a business day
- May be used everywhere Visa debit cards are accepted
  - Except at ATMs or in a foreign country
- Obtain balance, report lost/stolen card, plus other general information about your card available at (855) 887-1836 or [www.YCNCard.com](http://www.YCNCard.com).
- Card are not reloadable

**Wire Transfers (Incoming)**

- Incoming Wire Transfer fee
  - \$10.00 Customers
  - \$30.00 Non-Customers (pick-up on proper ID)
  - \$25.00 International: Customer

**Wire Transfers (Outgoing)**

- Outgoing Wire Transfer fee
  - \$15.00 All other account types
  - \$30.00 Non-Customer
  - \$45.00 International: Customer
  - \$60.00 International: Non-Customer

## Common Features

(Limits and Fees)

First Bank & Trust Co.

923 W Main

Duncan, OK 73533

(580) 255-1810

**The Following fees may be assessed against your account and the following transaction limitations, if any apply to your account:**

Online Banking	FREE
Online Bill Pay Monthly Maintenance Fee	FREE
Online Bill Pay Excess Item Fee (first 15 items per statement cycle free)	.50
Mobile Banking	FREE
Firstline 1-888-306-2265	FREE
Notary Service	FREE
ATM/Check Card Monthly Fee	FREE
Foreign ATM Transaction	2.00
International ATM Fee	5.00
ATM/Check Card Replacement	5.00
Telephone Transfer Fee	FREE
Sweep Transfer Fee	FREE
Collection Item Fee (Each)	7.50
Garnishment Fee	30.00
Levy Fee or Other Legal Fee	30.00
Copy Fee (Per Page)	.25
Insufficient Funds (NSF) Returned Item Charge	30.00
Insufficient Funds (NSF) Paid Item Charge	30.00
Overdraft Privilege (ODP) Paid Item Charge	30.00
Returned/Reprocessed Item Fee	5.00
Dormant Account Charge (Monthly Charge)	5.00
Dormant accounts are accounts with no activity (other than interest crediting) or contact from the depositor for more than 24 months.	
Wire Transfer	
(Outgoing) – Customer	15.00
(Incoming) – Customer	10.00
(Outgoing International) – Customer	45.00
(Incoming International) – Customer	25.00
(Outgoing) – Non-Customer	30.00
(Incoming) – Non-Customer	30.00
(Outgoing International) – Non-Customer	60.00
Account Research - Per Hour/1 Hour Minimum	25.00
Cashier's Check Fee	
Customer	5.00
Non-Customer	10.00
Stop Payment Order Fee	30.00
Caution Fee - for 90 Days (Temporary watch on account for lost or stolen checks)	30.00

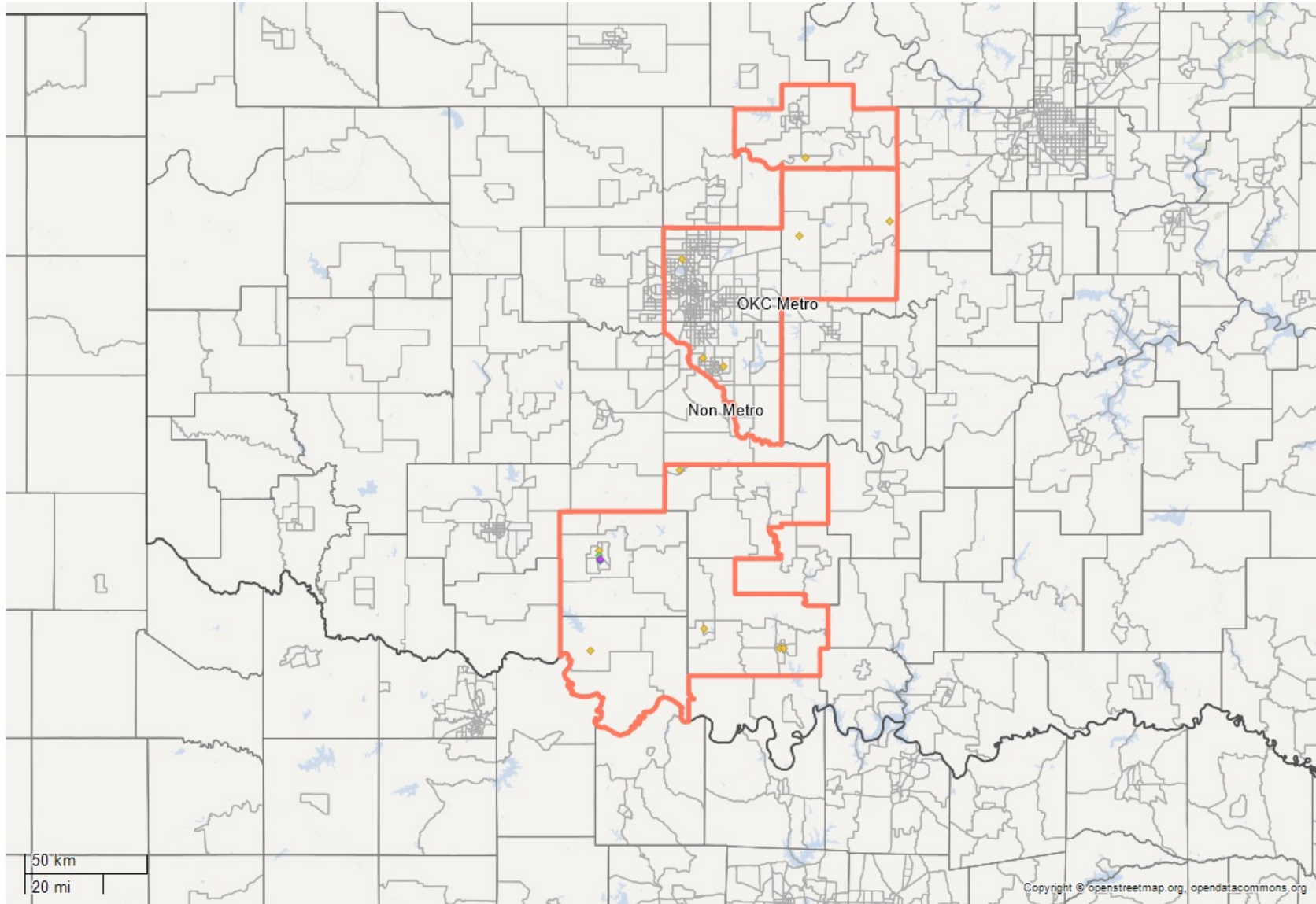
Snapshot/Temporary Statement	2.00
Statement Reconciliation - Per Hour/1 Hour Minimum	20.00
Fax Fee - Per Page	1.00
Gift Cards – Fee Per Card	5.00
Overdraft Accrual Charge – Commercial Accounts:	
Daily Fee Assessed on Overdrawn Balance	4.00
Interest Charged on Overdrawn Balance	18% APR
Overdraft Accrual Charge – Consumer Accounts:	
If overdrawn more than 5 days, by more than \$10.00 (Daily Fee)	1.00

Website: [www.fb247.com](http://www.fb247.com)  
Member FDIC Insured

## ASSESSMENT AREA MAPS

# First Bank & Trust Co. (OK)

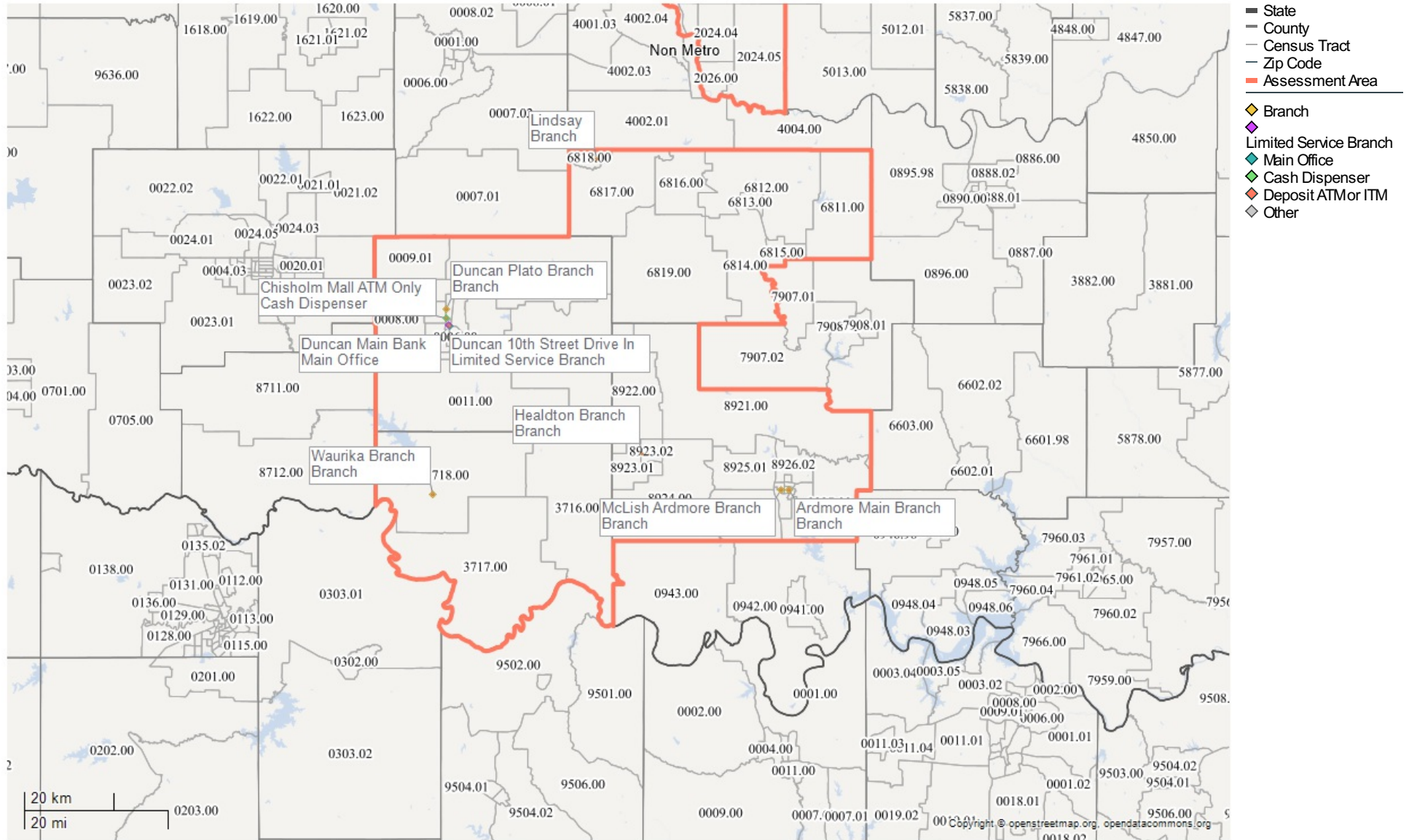
First Bank & Trust Assessment Areas



- State
- County
- Census Tract
- Zip Code
- Assessment Area
- Branch
- Limited Service Branch
- Main Office
- Cash Dispenser
- Deposit ATM or ITM
- Other

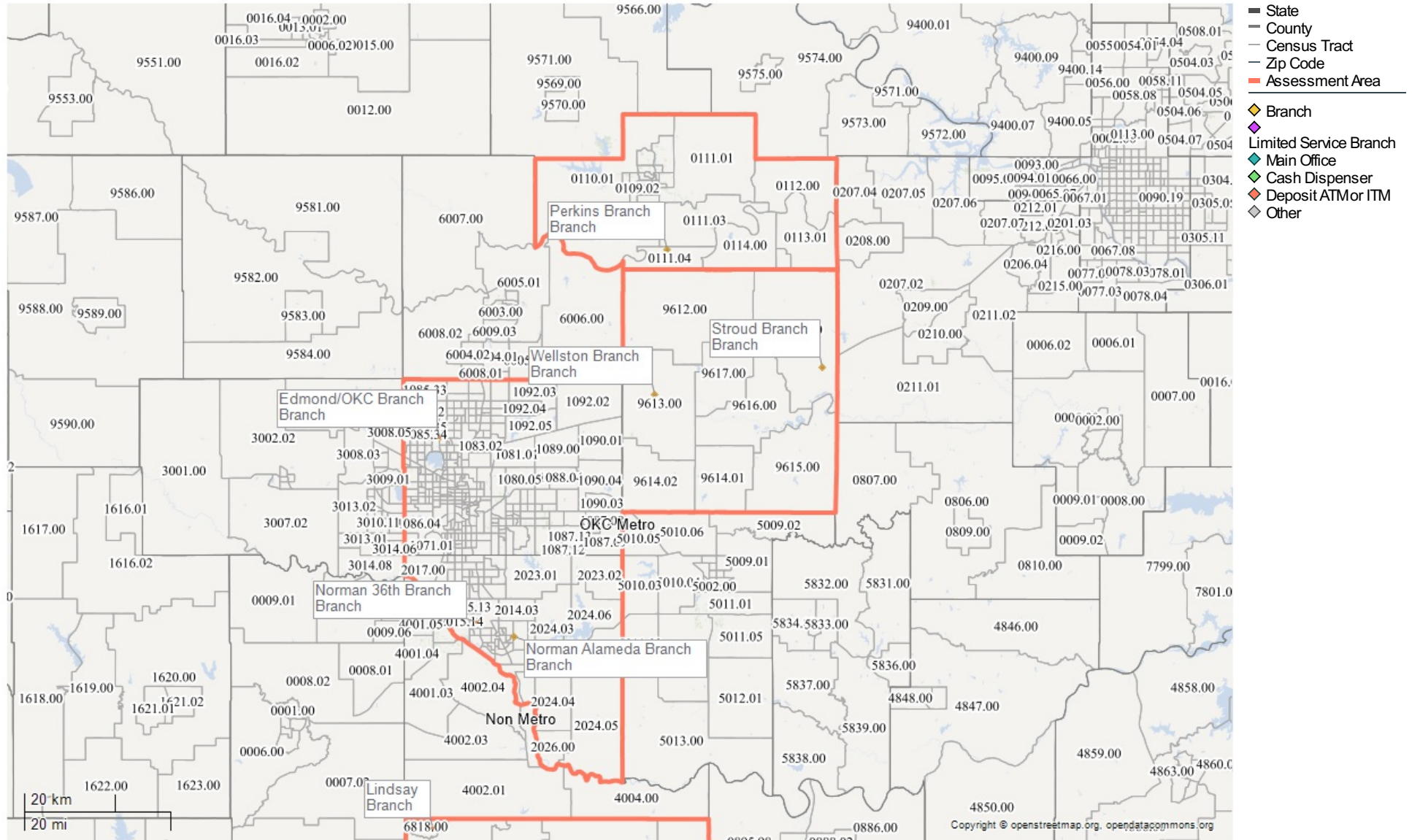
## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/28/2024)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (OKC Metro, Non Metro)



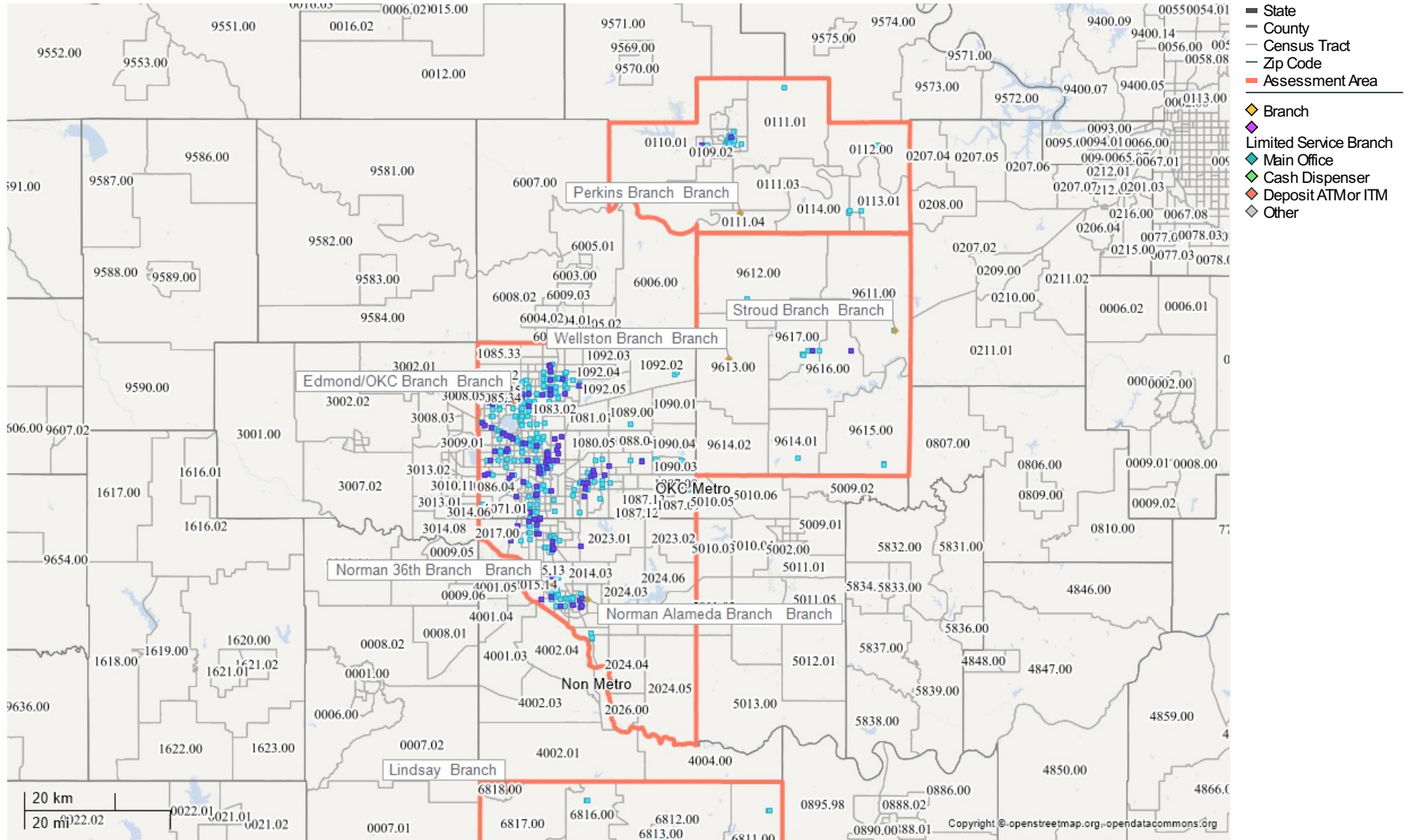
Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/28/2024)
- Real Estate Loans: Loan File
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Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/28/2024)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (OKC Metro, Non Metro)

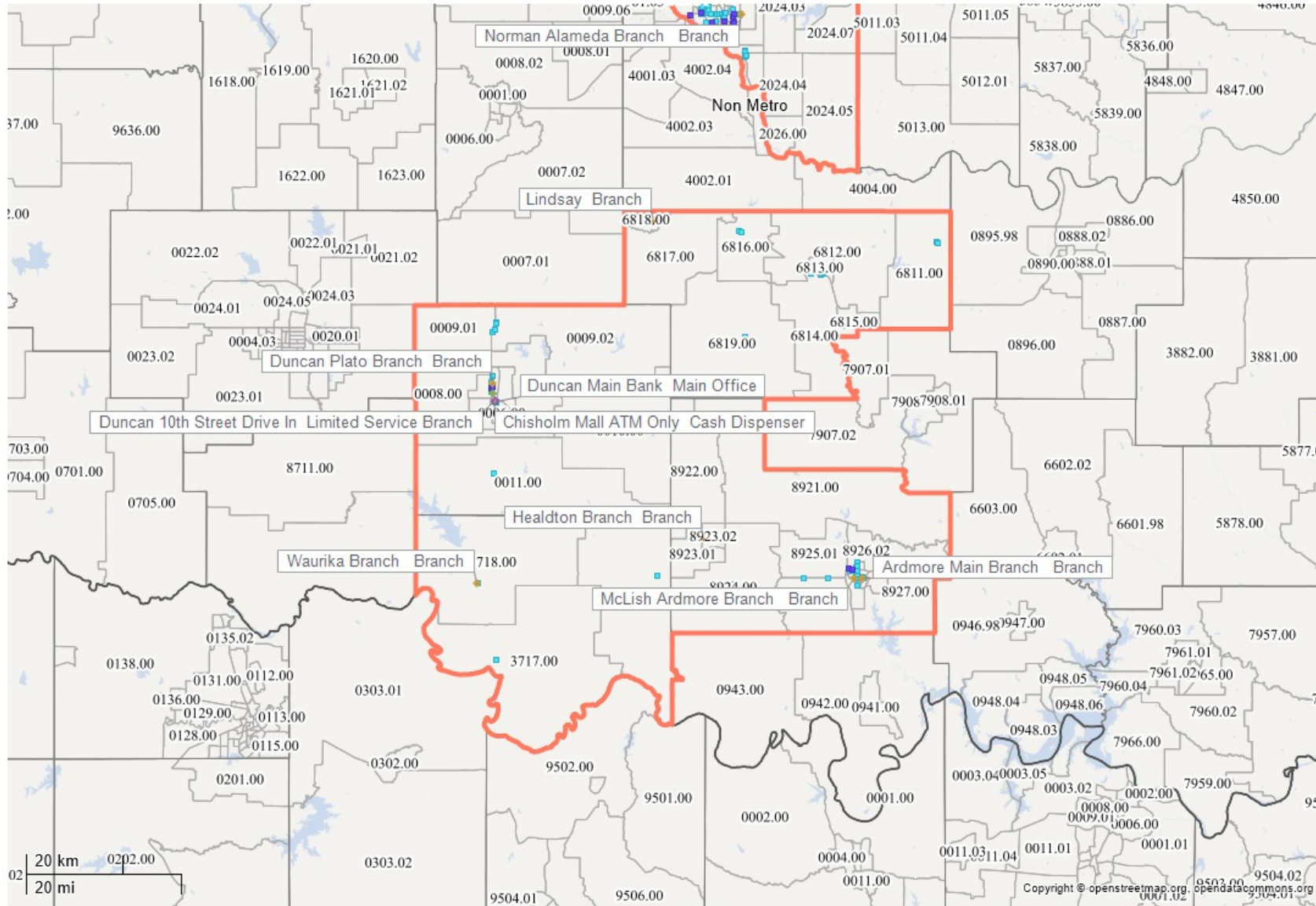


Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/30/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (OKC Metro, Non Metro)

# First Bank & Trust Co. (OK)

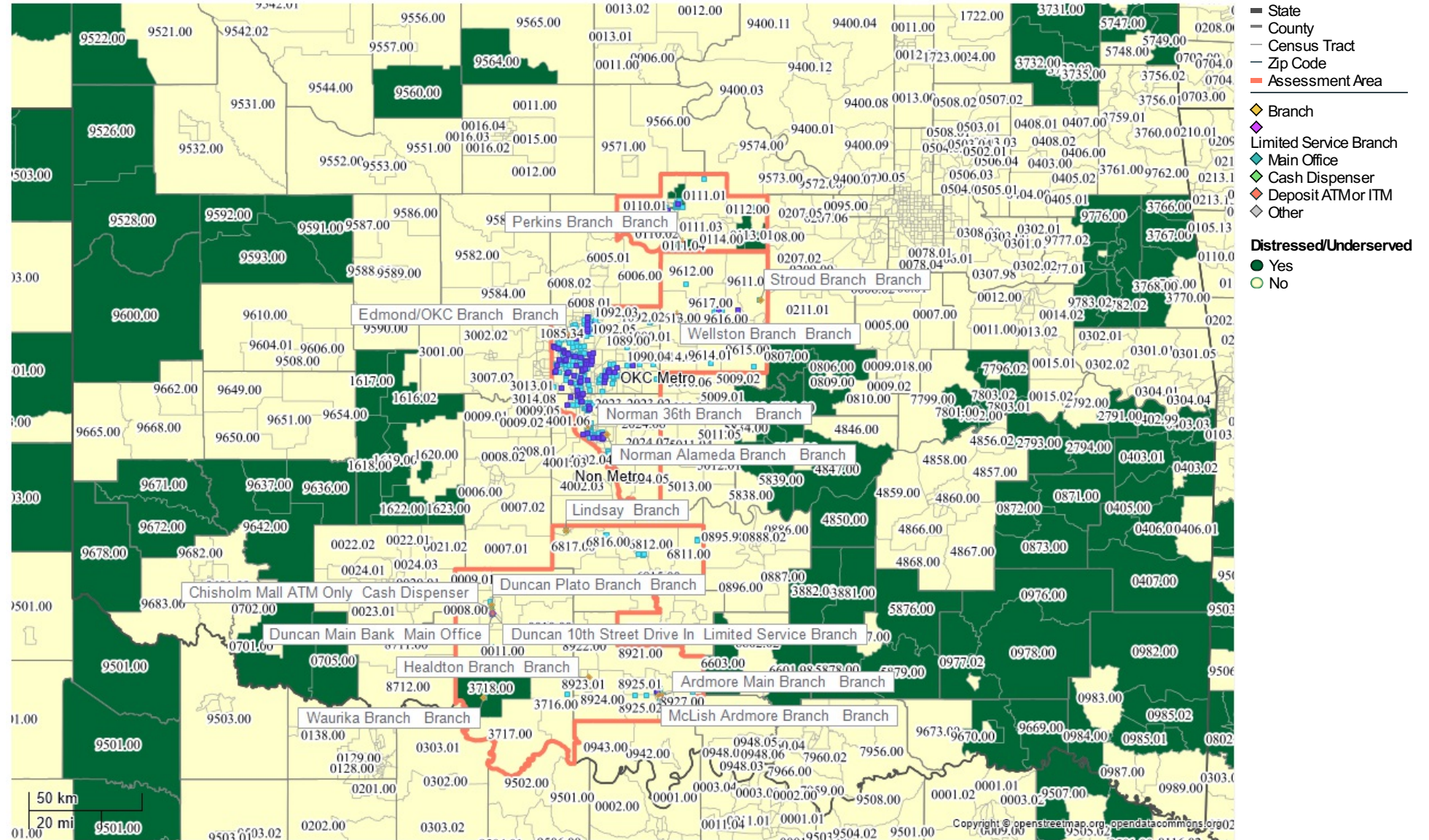
South with Competitors



- State
- County
- Census Tract
- Zip Code
- Assessment Area
- ◆ Branch
- ◆ Limited Service Branch
- ◆ Main Office
- ◆ Cash Dispenser
- ◆ Deposit ATM or ITM
- ◆ Other

## Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/30/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
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Applied Filters

- Facility Status: (Open)
- CRA Loans: Loan File
- Real Estate Loans Action Taken Date: (3/12/1996 - 6/30/2025)
- Real Estate Loans: Loan File
- You are included in the HMDA benchmark.
- Area: (OKC Metro, Non Metro)

**ASSESSMENT AREAS**

First Bank and Trust Co. has defined as its assessment areas by the following census tracts, all of which are whole counties

**MSA 36420  
Oklahoma - 40  
Cleveland County – 027**

2001.00	2002.00	2003.00	2004.00	2005.00	2006.02
2006.03	2006.04	2007.00	2008.00	2009.00	2010.00
2011.02	2011.03	2011.04	2012.01	2012.02	2012.04
2012.05	2013.02	2013.03	2014.03	2014.04	2014.05
2015.05	2015.08	2015.09	2015.11	2015.12	2015.13
2015.14	2016.02	2016.03	2016.04	2016.07	2016.09
2016.10	2016.11	2016.12	2017.00	2018.01	2018.02
2019.02	2019.03	2019.04	2020.02	2020.04	2020.05
2020.06	2020.07	2020.08	2021.02	2021.04	2021.05
2021.06	2021.07	2022.01	2022.03	2022.05	2022.07
2022.08	2023.01	2023.02	2024.03	2024.04	2024.05
2024.06	2024.07	2025.01	2025.02	2026.00	

**Oklahoma County – 109**

1001.00	1002.01	1002.02	1002.03	1003.00	1004.00
1005.00	1008.00	1008.00	1009.00	1010.00	1011.00
1012.00	1013.00	1014.00	1015.00	1018.00	1019.00
1020.00	1021.00	1022.00	1023.00	1024.00	1025.00
1032.00	1033.00	1039.00	1041.00	1042.00	1043.00
1044.00	1045.00	1046.00	1047.00	1048.00	1049.00
1050.00	1051.01	1052.01	1052.02	1053.00	1054.00
1055.00	1056.00	1059.03	1059.04	1059.05	1059.06
1059.07	1060.00	1061.00	1062.00	1063.01	1063.02
1063.03	1064.01	1064.02	1064.03	1065.01	1065.02
1065.03	1066.01	1066.02	1066.06	1066.07	1066.08
1066.09	1066.10	1066.11	1067.02	1067.04	1067.05
1067.08	1067.09	1067.10	1068.01	1068.02	1068.03
1068.04	1069.02	1069.03	1069.06	1069.07	1069.09
1069.10	1069.11	1069.12	1069.13	1069.14	1069.16
1069.17	1070.01	1070.02	1071.01	1071.03	1071.04
1072.06	1072.07	1072.12	1072.13	1072.14	1072.15
1072.16	1072.17	1072.18	1072.19	1072.20	1072.21
1072.22	1072.22	1072.23	1072.24	1072.25	1072.26
1073.02	1073.03	1073.05	1073.06	1074.01	1074.04
1074.05	1074.06	1074.07	1076.01	1076.04	1076.05
1076.08	1077.03	1077.04	1077.05	1077.06	1077.07
1078.01	1078.04	1078.05	1078.06	1078.07	1078.08

1078.09	1078.10	1079.00	1080.03	1080.05	1080.06
1080.07	1080.08	1080.09	1080.10	1080.11	1081.01
1081.06	1081.07	1081.09	1081.10	1081.13	1081.14
1082.01	1082.03	1082.04	1082.07	1082.08	1082.15
1082.16	1082.17	1082.22	1082.23	1082.24	1082.25
1082.26	1082.27	1082.28	1082.29	1082.30	1082.31
1082.32	1082.33	1082.34	1082.35	1082.36	1082.37
1082.38	1083.01	1083.02	1083.04	1083.07	1083.09
1083.10	1083.14	1083.17	1083.18	1083.19	1083.20
1083.21	1083.22	1083.23	1083.24	1083.25	1083.26
1084.02	1084.03	1084.04	1085.06	1085.07	1085.08
1085.13	1085.14	1085.15	1085.20	1085.21	1085.23
1085.24	1085.25	1085.26	1085.27	1085.28	1085.29
1085.30	1085.31	1085.32	1085.33	1085.34	1085.35
1085.36	1085.37	1085.38	1086.03	1086.04	1087.01
1087.06	1087.07	1087.08	1087.09	1087.10	1087.11
1087.12	1087.13	1088.02	1088.03	1088.04	1088.05
1088.06	1088.07	1089.00	1090.01	1090.03	1090.04
1092.02	1092.03	1092.04	1092.05	1093.00	1094.00
1095.00	1096.00	1097.00	1098.00	1099.00	1100.00
9800.01	9800.02	9800.03	9800.04	9800.05	9800.06
9800.07	9800.08	9800.09			

**Lincoln County – 081**

9611.00	9612.00	9613.00	9614.01	9614.02	9615.00
9616.00	9617.00				

**Non-MSA  
Stephens County – 137**

0001.01	0001.02	0002.00	0003.00	0004.00	0006.00
0008.00	0009.01	0009.02	0010.00	0011.00	

**Non-MSA  
Carter County – 019**

8921.00	0922.00	8923.01	8923.02	8924.00	8925.01
8925.02	8926.01	8926.02	8927.00	8928.01	8928.02
8929.00	8930.01	8930.02	8931.00		

**Non-MSA  
Jefferson County – 067**

3716.00	3717.00	3718.00	9999.99		
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**Non-MSA  
Payne County – 119**

0101.01	0101.02	0102.01	0102.02	0103.00	0104.00
0105.01	0105.02	0105.03	1006.00	0107.00	0108.00
0109.01	1009.02	0110.01	0110.02	0111.01	0111.03
0111.04	0112.00	0113.01	0113.02	0114.00	

**Non-MSA  
Garvin County – 049**

6811.00	6812.00	6813.00	6814.00	6815.00	6816.00
6817.00	6818.00	6819.00			

The bank delineates two assessment areas. Our non-MSA assessment area which includes Stephens County, Jefferson County, Carter County, and Garvin County which are contiguous to each other, as well as Payne County, which is noncontiguous. Oklahoma County, Cleveland County, and Lincoln County are contiguous and these tracts are all part of the same MSA and therefore count as a second assessment area.

The bank operates 13 full service banking centers, 1 motor bank, and 14 ATM's, all of which are deposit taking, within the areas delineated as its assessment areas.

## LOAN TO DEPOSIT RATIOS

# Loan to Deposit Ratio for Each Calendar Quarter Of 2023

<u>Quarter</u>	<u>LTD Ratio:</u>
<b>12-31-23</b>	<b>101.37%</b>
<b>9-30-23</b>	<b>100.93%</b>
<b>6-30-23</b>	<b>100.24%</b>
<b>3-31-23</b>	<b>95.95%</b>

# Loan to Deposit Ratio for Each Calendar Quarter Of 2024

<u>Quarter</u>	<u>LTD Ratio:</u>
<b>12-31-24</b>	<b>88.47%</b>
<b>9-30-24</b>	<b>95.54%</b>
<b>6-30-24</b>	<b>96.73%</b>
<b>3-31-24</b>	<b>98.36%</b>

# Loan to Deposit Ratio for Each Calendar Quarter Of 2025

<u>Quarter</u>	<u>LTD Ratio:</u>
<b>12-31-25</b>	<b>91.71%</b>
<b>9-30-25</b>	<b>92.05%</b>
<b>6-30-25</b>	<b>92.23%</b>
<b>3-31-25</b>	<b>87.05%</b>

## HMDA DISCLOSURE



# HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online.

For more information, visit the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

