



CRA Public File

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Community Reinvestment Act Notice

Main Office

Under the Federal Community Reinvestment Act (CRA), the Federal Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them, the public section of our most recent CRA Performance Evaluation, prepared by the Federal Reserve Bank of Kansas City (Reserve Bank), and comments received from the public relating to our performance in helping to meet community credit needs, as well as our response to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from the AVP, Consumer Affairs, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198, or through the Board's website at <https://www.federalreserve.gov>. You may send written comments about our performance in helping to meet community credit needs to Gentry Parker, CFO/COO of First Priority Bank, PO BOX 218, Pryor, OK 74362 and AVP, Consumer Affairs Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198, or through the Board's website at <https://www.federalreserve.gov>. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of First Pryor Bancorp, Inc., a bank holding company. You may request from AVP, Consumer Affairs, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198 an announcement of applications covered by the RA filed by banks holding companies.



Public File Comments

First Pryority Bank has not received any public comments concerning the bank's CRA performance in the previous two years.



PUBLIC DISCLOSURE

August 8, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Priority Bank
RSSD# 524953

310 East Graham Avenue
Pryor, Oklahoma 74361

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

First Priority Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas' (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's two AAs. The Tulsa County Metropolitan AA was assessed using a full-scope review. The Mayes County AA was assessed using a limited scope review. In order to gauge credit demand within the bank's AAs, aggregate lending data for the most recent three years (2018, 2019 and 2020) was referenced in the analysis. Additionally, greater weight was placed on the bank's small business loan product and its lending performance in the Tulsa County Metropolitan AA based on the bank's business strategy, focus, and overall loan portfolio composition. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio.
- A statistical sample of 90 small business loans from a universe of 162 loans and 98 home mortgage loans from a universe of 188 loans originated from January 1, 2021 through December 31, 2021.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Pryor, Oklahoma. Characteristics of the bank include:

- The bank is owned by First Pryor Bancorp, Inc., located in Pryor, Oklahoma (the company).
- The company also owns Locust Grove Banshares, Inc, located in Pryor, Oklahoma. Locust Grove Banshares, Inc., owns Lakeside Bank of Salina in Salina, Oklahoma, and Bank of Locust Grove in Locust Grove, Oklahoma.
- The bank had total assets of \$334.0 million, as of March 31, 2022.
- In addition to its main office in Pryor, the bank operates one full-service branch in Tulsa, Oklahoma.
- The main office and the Tulsa Branch both have drive-up facilities and cash-dispensing automated teller machines (ATMs).
- As shown in Table 1, the bank’s primary business focus is commercial and residential real estate lending. The bank also offers lending programs for consumer and commercial purpose aircraft lending.

Table 1

Composition of Loan Portfolio as of March 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	28,707	11.2
Farmland	1,224	0.5
1- to 4- Family Residential Real Estate	33,337	13.1
Multifamily Residential Real Estate	31,208	12.2
Nonfarm Nonresidential Real Estate	68,859	27.0
Agricultural	1,328	0.5
Commercial and Industrial	71,577	28.0
Consumer	13,468	5.3
Other	5,539	2.2
Gross Loans	255,247	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its May 14, 2018 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA¹

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the Tulsa County Metropolitan AA (full-scope review) and a brief discussion of performance in the Mayes County AA (limited scope review).

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

The bank’s overall lending test performance is Satisfactory based on a reasonable NLTD ratio, a majority of loans originated within the bank’s AAs, a reasonable geographic distribution of loans, and a reasonable borrower distribution of loans within the bank’s full-scope review AA. The institution’s lending performance in the Mayes County AA was consistent with the institution’s performance overall.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on the institution’s asset size, product offerings, and location (operating within the AA or adjacent area).

The bank’s NLTD ratio is reasonable. The bank’s 17-quarter NLTD ratio, at 83.5 percent, is above the ratios of four similarly situated banks and below one other bank, with ratios that ranged from 53.9 percent to 92.6 percent.

Table 2

Comparative NLTD Ratios March 31, 2018 – March 31, 2022			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
First Priority Bank	Pryor, Oklahoma	334,008	83.5
Similarly Situated Institutions			
The First National Bank and Trust Company of Broken Arrow	Broken Arrow, Oklahoma	252,052	77.5
Bank of Commerce	Chelsea, Oklahoma	203,711	74.2
Oklahoma Capital Bank	Tulsa, Oklahoma	146,663	92.6
The Exchange Bank	Skiatook, Oklahoma	149,558	53.9
American Bank and Trust Company	Tulsa, Oklahoma	303,021	54.7

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. As illustrated in Table 3, the bank originated a majority of loans, by number and dollar volume, inside its delineated AAs.

Table 3

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Residential Loans	59	60.2	12,418	53.0	39	39.8	11,012	47.0
Small Business	59	65.6	11,118	73.1	31	34.4	4,098	26.9
Total Loans	118	62.8	23,537	60.9	70	37.2	15,110	39.1

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs.

The bank’s overall geographic distribution of loans reflects a reasonable distribution among the different census tracts and dispersion throughout the AAs. This conclusion is primarily derived from a reasonable penetration of loans noted in the Tulsa Metropolitan AA, while the distribution of loans in the Mayes County AA reflected consistent penetration levels.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank has an overall reasonable distribution of loans among individuals of different income levels and businesses of different sizes. Penetration levels in the Tulsa Metropolitan AA were reasonable, while lending performance was consistent in the Mayes County AA.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**TULSA COUNTY METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE TULSA COUNTY METROPOLITAN AA

The Tulsa County Metropolitan AA includes Tulsa County in its entirety and is one of seven counties that comprise the Tulsa, Oklahoma Metropolitan Statistical Area (MSA) (see Appendix A for an AA map and Appendix B for additional demographic data).

- The delineation of the AA has not changed since the prior evaluation.
- The AA is comprised of 175 census tracts, including 17 low-, 54 moderate-, 51 middle-, and 53 upper-income tracts.
- The AA includes one branch office in Tulsa and one cash dispensing ATM.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank held a 0.4 percent share of deposits in the AA, which ranked 33rd of 47 FDIC-insured depository institutions operating from 195 offices in Tulsa County.
- An interview with a community member within the bank’s AA was conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an area economic development organization.

Table 4

Population Change			
Assessment Area: Tulsa County Metropolitan			
Area	2010 Population	2015 Population	Percent Change
Tulsa County Metropolitan AA	603,403	623,335	3.3
Tulsa, OK MSA	937,478	962,676	2.7
Oklahoma	3,751,351	3,849,733	2.6
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 - 2015 U.S. Census Bureau: American Community Survey</i>			

- According to 2020 Census Bureau statistics, the AA’s population increased approximately 7.4 percent between 2015 and 2020, reflecting a population figure of 669,279.
- According to the 2015 American Community Survey (ACS) data, the Tulsa County AA accounts for approximately 16.2 percent of the statewide population.

Table 5

Median Family Income Change			
Assessment Area: Tulsa County Metropolitan			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Tulsa County Metropolitan AA	64,052	61,809	(3.5)
Tulsa, OK MSA	63,201	61,182	(3.2)
Oklahoma	58,375	58,029	(0.6)

*Source: 2006 - 2010 U.S. Census Bureau: American Community Survey
2011 - 2015 U.S. Census Bureau: American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- The AA contains a concentration of families below the poverty level at 12.3 percent, which compared similarly to the statewide figure of 12.4 percent and was slightly above the Tulsa MSA figure of 11.4 percent.

Table 6

Housing Cost Burden						
Assessment Area: Tulsa County Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa County Metropolitan AA	76.0	43.2	40.6	61.9	36.1	17.5
Tulsa, OK MSA	73.2	41.0	39.3	56.8	31.7	16.8
Oklahoma	72.2	37.1	38.1	55.1	28.2	16.6

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014 - 2018 Comprehensive Housing Affordability Strategy

- According to the 2015 ACS data, median gross rent in the AA is \$774, which is above the statewide figure of \$727 and Tulsa MSA figure of \$759.
- Furthermore, at \$138,516, the median housing value in the AA is above the statewide figure of \$117,900 and the Tulsa MSA figure of \$131,392.

Table 7

Unemployment Rates					
Assessment Area: Tulsa County Metropolitan					
Area	2017	2018	2019	2020	2021
Tulsa County Metropolitan AA	4.0	3.2	3.0	6.6	4.0
Tulsa, OK MSA	4.2	3.3	3.1	6.5	4.0
Oklahoma	4.0	3.3	3.1	6.2	3.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The major industries operating in the AA includes healthcare, followed by aerospace, education, retail, and local government.

- The largest employers in the AA include Saint Francis Health System, American Airlines, Tulsa Public Schools, Hillcrest Healthcare System, Ascension St. John, Macy's, and the City of Tulsa.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN TULSA COUNTY METROPOLITAN AA

The bank's performance under the lending test in the Tulsa County Metropolitan AA is reasonable. Overall, the bank's geographic distribution of loans is adequate, with reasonable borrower distribution of loans among individuals of different incomes and businesses of different sizes.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects a reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. As illustrated in Table 8, the bank's lending in low-income census tracts was below the percentage of owner-occupied units in the AA. A three-year analysis of aggregate Home Mortgage Disclosure Act (HMDA) lending data noted an average lending distribution to low-income borrowers of 1.3 percent by number and 0.8 percent by dollar volume. While aggregate HMDA data is not considered a direct comparison as the bank is not a HMDA reporter, the aggregate volumes suggest lower levels of credit demand in the AA's low-income census tracts. The bank's lending among moderate-income census tracts reflected penetration levels above the percentage of owner-occupied units. Overall, home mortgage lending performance is reasonable.

In addition, there were no gaps in the distribution of loans among the various geographies that impacted the conclusion.

Table 8

Distribution of 2021 Home Mortgage Lending By Income Level of Geography					
Assessment Area: Tulsa County Metropolitan					
Geographic Income Level	Bank Loans				Owner Occupied Units
	#	#%	\$(000)	\$%	
Low	1	1.8	104	0.9	4.5
Moderate	18	32.7	2,058	18.1	20.5
Middle	20	36.4	4,244	37.2	32.9
Upper	16	29.1	4,989	43.8	42.1
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	55	100.0	11,395	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank did not originate a small business loan in a low-income tract during the analysis year. Information from a community member indicated that opportunities for small business lending in low-income tracts is limited by a smaller volume of businesses operating in such areas, which is supported by a relatively lower demographic figure illustrated in Table 9.

Small business lending in moderate-income tracts reflected lending below the demographic figure. An analysis was conducted to understand what factors may impact the bank’s ability to penetrate such tracts, including proximity to moderate-income areas, competition, as well as information obtained from members of the community. A further review of the loan sample also provided valuable context as to the impact of a notable volume of loans (14 of 50 loans) that were originated to the same three business entities in the analysis year, which comprised 28.0 percent of the sample. Additionally, the relationship loans were each located in middle- and upper-income tracts, respectively. When considering the impact of relationship lending in the loan distribution analysis, and in addition to other contextual factors, the bank’s penetration of loans among moderate-income tracts did not reveal unfavorable performance.

Additionally, some gaps were identified in LMI census tracts in the northern portions of Tulsa County; however, they were not considered significant given the bank’s proximity to LMI census tracts in the northern portion of the AA. Additionally, lending activity was identified in moderate-income census tracts located within a five- to seven-mile range of the bank’s branch.

Table 9

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Tulsa County Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	4.1
Moderate	7	14.0	1,608	19.0	22.1
Middle	17	34.0	2,062	24.3	34.9
Upper	26	52.0	4,803	56.7	38.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	50	100.0	8,473	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is excellent. As illustrated in Table 10, the bank’s lending to low-income borrowers was comparable to the demographic figure, while lending to moderate-income borrowers was above the demographic figure.

Table 10

Distribution of 2021 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Tulsa County Metropolitan					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	\$%	
Low	9	16.4	880	7.7	22.0
Moderate	14	25.5	1,724	15.1	16.9
Middle	13	23.6	2,210	19.4	19.6
Upper	19	34.5	6,581	57.8	41.4
Unknown	0	0.0	0	0.0	0.0
Total	55	100.0	11,395	100.0	100.0

*Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey*

Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to small businesses was below the demographic figure and reflected loan penetration that was generally split between small businesses and those with revenues of greater than \$1 million.

A review of aggregate lending data submitted by CRA reporters in the bank’s AA noted an average lending distribution of 39.1 percent by number and 29.4 percent by dollar to small businesses. This aggregate lending data was considered as additional context in understanding credit demand by size of businesses in the AA, which further supports the bank’s reasonable small business lending performance. A further analysis was conducted to evaluate the impact of recurring relationship loans included in the loan sample. The results determined that 14 loans were originated to three borrowers that had gross annual revenues greater than \$1 million, thus skewing the loan distribution. Based on this additional context, the bank’s small business lending performance is reasonable.

Table 11

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Tulsa County Metropolitan					
	Bank Loans				Total Businesses
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	24	48.0	3,393	40.0	91.0
Over \$1 Million	24	48.0	3,899	46.0	8.3
Revenue Unknown	2	4.0	1,180	13.9	0.7
Total	50	100.0	8,473	100.0	100.0
By Loan Size					
\$100,000 or Less	28	56.0	1,270	15.0	
\$100,001 - \$250,000	11	22.0	1,917	22.6	
\$250,001 - \$1 Million	11	22.0	5,286	62.4	
Total	50	100.0	8,473	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	16	66.7	696	20.5	
\$100,001 - \$250,000	2	8.3	310	9.1	
\$250,001 - \$1 Million	6	25.0	2,387	70.4	
Total	24	100.0	3,393	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**MAYES COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MAYES COUNTY AA

The Mayes County AA includes Mayes County in its entirety. Refer to Appendix A for a map of the AA, as well as Appendix C for lending performance.

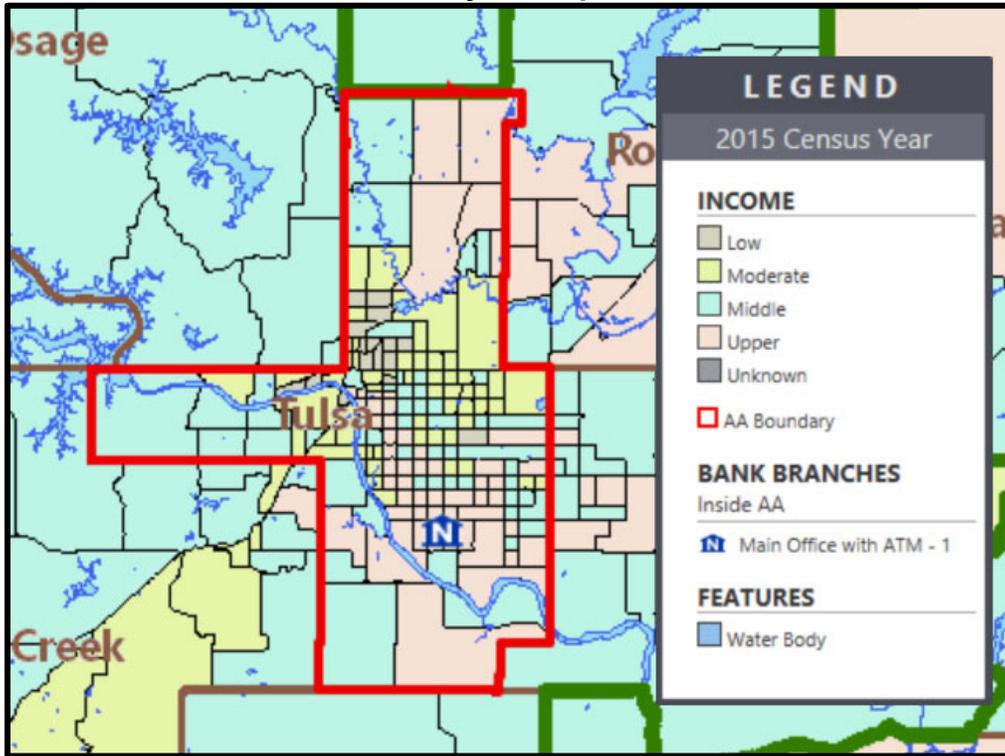
- The AA is comprised of 1 moderate-, 6 middle-, and 2 upper-income census tracts.
- The bank operates its main office in Pryor, Oklahoma, which includes one drive-up facility and one cash-dispensing ATM.
- According to the June 30, 2021 FDIC Summary of Deposits Market Share Report, the bank ranked 2nd of 12 FDIC-insured depository institutions operating in Mayes County with a total deposit market share of 14.8 percent.
- According to 2020 Census data, the AA's population is 39,046.

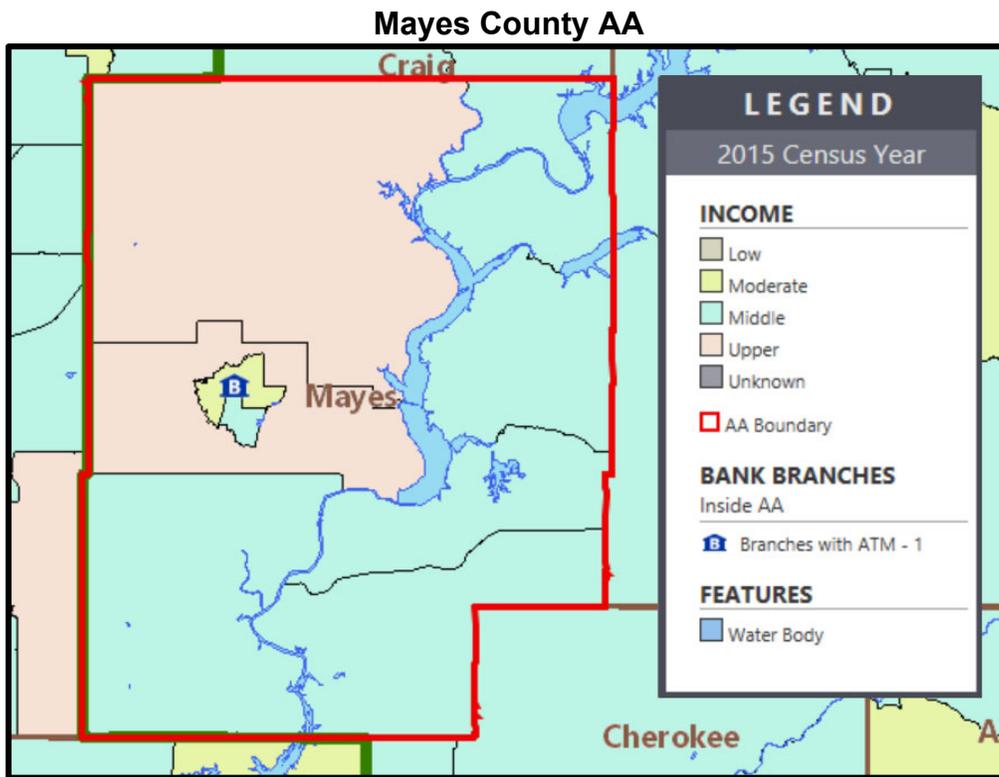
CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN MAYES COUNTY AA

Performance in the Mayes County Metropolitan AA was evaluated using limited-scope examination procedures. The bank's lending activity in the AA included four home mortgage loans and nine small business loans originated between January 1, 2021 and December 31, 2021. The lending performance in the AA is consistent with the lending performance for the overall institution.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

Tulsa County Metropolitan AA





APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2021 Tulsa County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	9.7	10,765	6.9	4,413	41.0	34,488	22.0
Moderate	54	30.9	39,165	25.0	8,290	21.2	26,498	16.9
Middle	51	29.1	49,004	31.3	4,194	8.6	30,724	19.6
Upper	53	30.3	57,640	36.8	2,300	4.0	64,864	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	175	100.0	156,574	100.0	19,197	12.3	156,574	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	4.5	29.1	12,302	53.7	3,930	17.2
Moderate	77,468	30,109	20.5	38.9	36,618	47.3	10,741	13.9
Middle	87,534	48,253	32.9	55.1	31,422	35.9	7,859	9.0
Upper	86,986	61,760	42.1	71.0	18,945	21.8	6,281	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	274,891	146,793	100.0	53.4	99,287	36.1	28,811	10.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,578	4.1	1,364	3.9	202	6.3	12	4.3
Moderate	8,563	22.1	7,510	21.3	1,004	31.2	49	17.6
Middle	13,507	34.9	12,232	34.7	1,184	36.8	91	32.6
Upper	15,061	38.9	14,109	40.1	825	25.7	127	45.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	38,709	100.0	35,215	100.0	3,215	100.0	279	100.0
Percentage of Total Businesses:				91.0		8.3		0.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	8	2.4	7	2.2	1	16.7	0	0.0
Moderate	39	11.7	38	11.7	1	16.7	0	0.0
Middle	122	36.7	119	36.7	3	50.0	0	0.0
Upper	163	49.1	160	49.4	1	16.7	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	332	100.0	324	100.0	6	100.0	2	100.0
Percentage of Total Farms:				97.6		1.8		0.6
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-2

2021 Mayes County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,435	21.7
Moderate	1	11.1	1,198	10.7	298	24.9	1,975	17.6
Middle	6	66.7	6,843	60.9	1,266	18.5	2,543	22.6
Upper	2	22.2	3,188	28.4	270	8.5	4,276	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9	100.0	11,229	100.0	1,834	16.3	11,229	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,076	909	7.9	43.8	873	42.1	294	14.2
Middle	12,705	7,391	64.1	58.2	2,648	20.8	2,666	21.0
Upper	4,450	3,231	28.0	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	19,231	11,531	100.0	60.0	4,209	21.9	3,491	18.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	296	22.4	269	22.7	21	21.0	6	17.6
Middle	728	55.1	652	54.9	53	53.0	23	67.6
Upper	297	22.5	266	22.4	26	26.0	5	14.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,321	100.0	1,187	100.0	100	100.0	34	100.0
Percentage of Total Businesses:				89.9		7.6		2.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	1.3	1	1.3	0	0.0	0	0.0
Middle	40	51.3	40	51.9	0	0.0	0	0.0
Upper	37	47.4	36	46.8	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	78	100.0	77	100.0	0	0.0	1	100.0
Percentage of Total Farms:				98.7		0.0		1.3
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

APPENDIX C – LIMITED SCOPE REVIEW ASSESSMENT AREA TABLES

Table C-1

Distribution of 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Mayes County					
Geographic Income Level	Bank Loans				Owner Occupied Units
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	1	25.0	235	23.0	7.9
Middle	1	25.0	360	35.2	64.1
Upper	2	50.0	428	41.8	28.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	4	100.0	1,023	100.0	100.0

Source: 2021 FFIEC Census Data
 2011-2015 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Table C-2

Distribution of 2021 Small Business Lending By Income Level of Geography Assessment Area: Mayes County					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	2	22.2	425	16.1	22.4
Middle	2	22.2	568	21.5	55.1
Upper	5	55.6	1,652	62.5	22.5
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	9	100.0	2,645	100.0	100.0

Source: 2021 FFIEC Census Data
 2021 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Table C-3

Distribution of 2021 Home Mortgage Lending By Borrower Income Level					
Assessment Area: Mayes County					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	21.7
Moderate	0	0.0	0	0.0	17.6
Middle	2	50.0	457	44.7	22.6
Upper	2	50.0	567	55.4	38.1
Unknown	0	0.0	0	0.0	0.0
Total	4	100.0	1,023	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-4

Distribution of 2021 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Mayes County					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	5	55.6	698	26.4	89.9
Over \$1 Million	4	44.4	1,947	73.6	7.6
Revenue Unknown	0	0.0	0	0.0	2.6
Total	9	100.0	2,645	100.0	100.0
By Loan Size					
\$100,000 or Less	3	33.3	111	4.2	
\$100,001 - \$250,000	2	22.2	383	14.5	
\$250,001 - \$1 Million	4	44.4	2,152	81.4	
Total	9	100.0	2,645	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	3	60.0	111	15.9	
\$100,001 - \$250,000	1	20.0	182	26.1	
\$250,001 - \$1 Million	1	20.0	405	58.0	
Total	5	100.0	698	100.0	

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX D – 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.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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

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

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, 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.

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.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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



Locations and Hours

First Priority Bank recognizes and observes federal holidays throughout the year. Bank offices may be closed on these days.

Tulsa – Retail Branch, Corporate Office and ATM

10632 S. Memorial
Tulsa, OK 74133
(918) 369-2424

Lobby Hours

Mon- Thur 8:00am – 4:00pm
Fri 8:00am – 5:00pm
Sat Closed

Drive-Thru Hours

Mon- Fri 8:00am – 6:00pm
Sat Closed

MSA	46140
State Code	40
County Code	143
Tract Code	0076.36

East Tulsa – Retail Branch and ATM

12212 E 41st
Tulsa, OK 74146
(918) 986-8888

Lobby Hours

Mon- Thur 8:00am – 4:00pm
Fri 8:00am – 5:00pm
Sat Closed

Drive-Thru Hours

Mon- Fri 8:00am – 6:00pm
Sat Closed

MSA	46140
State Code	40
County Code	143
Tract Code	0090.08

Pryor – Retail Branch and ATM

310 E. Graham
Pryor, OK 74361
(918) 825-2121

Lobby Hours

Mon- Thur 9:00am – 4:00pm
Fri 9:00am – 5:00pm
Sat Closed

Drive-Thru Hours

Mon- Fri 8:00am – 6:00pm
Sat 8:00am – 12:00pm

MSA	N/A
State Code	40
County Code	097
Tract Code	0401.00

Norman – LPO/DPO*

480 24th Ave NW, Ste 124
Norman, OK 73069
(405) 857-7287

Mon – Fri 9:00am – 4:00pm

MSA	36420
State Code	40
County Code	027
Tract Code	2009.00

**Loan Production Office and Deposit Product Office, location cannot receive deposits or make withdrawals.*



Branch Openings/Closings

First Priority Bank has not closed any branches in the previous two years.

The following branches have been opened in the past two calendar years:

East Tulsa – Retail Branch and ATM

12212 E 41st

Tulsa, OK 74146

MSA	46140
State Code	40
County Code	143
Tract Code	0090.08

Norman – LPO/DPO*

480 24th Ave NW, Ste 124

Norman, OK 73069

MSA	36420
State Code	40
County Code	027
Tract Code	2009.00

PRYORITY.BANK

Deposit Products

- Certificate of Deposits
- Individual Retirement Accounts
- Interest bearing Business and Personal accounts
- Money Market Checking Accounts
- Personal and Business Checking Accounts
- Savings Accounts

Loan Products

- Agriculture Loans and Lines of Credit
- Aircraft Loans
- Auto Loans
- Business Lines of Credit
- CD Secured Loans
- Commercial RE Loans
- Consumer Mortgages
- Equipment and Machinery Loans
- ITIN Mortgages
- Personal Loans
- Secondary Market Mortgages
- Small Business Administration Loans
- Unsecured Loans
- USDA Business and Industry Loans

Additional Services

- 24/7 ATM Access
- Account Balancing Assistance
- ACH Origination
- ATM/Debit Card – Consumer and Business
- Business Cash Management, ACH Origination, Remote Deposit Capture, Positive Pay, Wire Service
- Cashier's Check and Money Orders
- Cash Management Services
- Check Imaging
- Credit Cards – Consumer and Business
- Credit Life and Disability Insurance
- Internet and Mobile Banking: Bill Pay, E- Statements and Mobile Deposits, Person to Person
- Mobile Wallet: Apply Pay, Samsung Pay, and Google/Android Pay
- Notary and Fax Services
- Overdraft Protection
- Safe Deposit Boxes
- Telephone Banking
- Wire Transfers



Fee Schedule

FEES AND CHARGES. The following fees and charges may be assessed against your account:

* Overdraft Item Fees (per presentment)	\$28.55
*Return Item for NSF (per presentment)	\$28.55
Account closed within 90 Days (pers account)	\$25.00
Account Research (per hour)	\$18.00
Balance Assistance (per account)	\$20.00
Cashier Check Fees (per check)	\$10.00
Collection (per transaction)	\$15.00
Debit Card Replacement (per card)	\$5.00
Dormant Fee- Checking after 12 months of no activity (monthly)	\$1.00
Dormant Fee- Savings after 24 months of no activity (monthly)	\$1.00
Garnishment and Levies (per request)	\$25.00
Lock Bags (per bag)	\$25.00
Money Order Fees (per check)	\$2.00
Multiple Statements appears as SC Electronic Statement fee (monthly)	\$8.00
Notary Service (per request)	\$5.00
Paper Statement appears as SC Electronic Statement Fee (monthly)	\$5.91
Stop Payment Fee (per request)	\$28.55
Telephone Transfer (per transfer)	\$3.00
Temporary Checks (per check)	\$0.10
Treasury Management ACH Item Fee (per presentment)	\$0.15
Treasury Management ACH Fee (monthly)	\$35.00
Treasury Management Lock Box Fee (monthly)	\$200.00
Treasury Management Lock Box Item Fee (per transaction)	\$0.15
Treasury Management Analysis (monthly)	\$35.00
Treasury Management Remote Deposit Capture Fee (per transaction)	\$35.00
Treasury Management Remote Deposit Capture item (per presentment)	\$0.35
Wire Fee: Domestic Outgoing (per wire) \$1 - \$499,999.99	\$15.00
Wire Fee: Domestic Outgoing (per wire) \$500,000 and above	\$30.00
Wire Fee: International Outgoing (per wire) \$1 - \$499,999.99	\$35.00
Wire Fee: International Outgoing (per wire) \$500,000 and above	\$50.00
MSB Account Management Fee (monthly)	\$350.00

***Fee may be imposed by check, in-person withdrawal, ATM withdrawal or other electronic means.**

Consumer Loan Fee Sheet

Effective as of 2/1/2026

Consumer Loan Fees:

Document Preparation Fee ^A :	\$112.00
Consumer Payment Book:	\$1.00 per month (not to exceed \$60)
Deferral Fee:	\$30.00
Extension Fee:	\$50.00
Modification of Terms:	\$85.00
VSI Fee	\$50.00
Flood Certification:	\$15.00
UCC-1 Filing Fee:	\$10.00 for first 5 pages, \$1.00 for each additional
UCC-3 Termination Fee:	\$10.00
Mortgage Filing Fee:	\$18.00 for first page, \$2.00 for each additional
Future Mortgage Release Fee:	\$18.00 for first page, \$2.00 for each additional
Appraisal/Valuation Fees:	See Appraisal & Third Party Fee Sheet

Consumer Construction^E

Origination	1.00%
Processing	\$200.00
Underwriting	\$352.00
Construction Rate Mod Fee*:	\$195.00 (Once Per Life of Loan)

ITIN Consumer Mortgage^E

Origination	1.25%
Processing	\$200.00
Underwriting	\$352.00

Portfolio Consumer Mortgage^E

Origination	\$1,450
Underwriting	\$352.00

Consumer Aircraft Loan Fees:

Document Preparation Fee:	\$112.00
Payment Book:	\$60.00
VSI Fee	\$250.00
FedEx Fee:	\$40.00 (Subject to FedEx changes)
Wire Fee:	\$15.00
Prepayment Penalty	2% / 24 Months
Extension Fee:	\$50.00 (No Fee to convert Kit to Amortizing)

^AConsumer Document Prep Fee may be lowered in the event of a violation in the APR limits; all other deviations must be approved by the FPB Board Approval. **Consumer Doc Prep Fee does not apply to Mortgage Department Loans.**

^ECurrent FPB Employees may have the 1.0% origination fee waived on consumer mortgage loans.

*All deviations of FPB issued fees must be approved by the Bank President.

**All deviations of FPB issued fees must be approved by the FPB Bank Board.

Commercial Loan Fee Sheet

Effective as of 2/1/2026

Commercial Loan Fees:

Document Preparation Fee**:		\$382.00 (loans under \$500,000)
		\$792.00 (loans \$500,000 to \$1,000,000)
		\$992.00 (loans greater than \$1,000,000)
Underwriting Fee**:	} Either/or, not both.	\$312.00 (loans to relationships over \$1,000,000)
GLOC Underwriting Fee**:		0.15% of Principal, Min \$312 (Loans approved under a GLOC)
Matured Loan Late Fee*:		0.50% of Principal (loans under \$500,000)
		0.35% of Principal (loans \$500,000 to \$1,000,000)
		0.25% of Principal (loans greater than \$1,000,000)
Deferral Fee*:		\$80.00
Extension Fee*:		\$191.00 (loans under \$500,000)
		\$396.00 (loans \$500,000 to \$1,000,000)
		\$796.00 (loans greater than \$1,000,000)
Modification of Terms*:		\$382.00 (Re-ams may have fee waived/reduced w/o President's approval)
VSI Fee:		\$50.00
Flood Certification:		\$15.00
UCC-1 Filing Fee:		\$10.00 for first 5 pages, \$1.00 for each additional
UCC-3 Termination Fee:		\$10.00
Mortgage Filing Fee:		\$18.00 for first page, \$2.00 for each additional
Future Mortgage Release Fee:		\$18.00 for first page, \$2.00 for each additional
Appraisal/Valuation Fees:		See Appraisal & Third-Party Fee Sheet

Commercial Aircraft Loan Fees:

Document Preparation Fee**:	\$382.00 (loans under \$500,000)
	\$792.00 (loans \$500,000 to \$1,000,000)
	\$992.00 (loans greater than \$1,000,000)
Payment Book:	\$60.00
VSI Fee	\$250.00
FedEx Fee:	\$40.00 (Subject to FedEx changes)
Wire Fee:	\$15.00
Prepayment Penalty	2% / 24 Months
Extension Fee:	\$50.00 (No Fee to convert Kit to Amortizing)

SBA Fees: (Excluding 504)

Document Preparation Fee:	See Packaging Fee – SBA rules apply
Packaging Fee:	\$1,000.00 to \$2,500.00 ^T
Underwriting Fee:	(Included as part of the packaging fee)

^T The SBA packaging fee amount is determined by the amount of time required to prepare the documents that packages and submitted to the SBA for approval.

*All deviations of FPB issued fees must be approved by the Bank President.

**All deviations of FPB issued fees must be approved by the FPB Bank Board.

Appraisal & Third Party Fee Sheet

Effective as of 2/1/2026

**All third party fees are subject to change or modification based on actual fee charged to the bank by the service provider.*

Appraisal Fees:

*Appraisal (Consumer/Commercial):	Price based on bid in Appraisal Shield
*External Evaluation (Desktop Valuation):	\$175.00 (unique or rush may vary)
Internal Evaluation (FPB Officer):	\$150.00

***Appraisal Review Fees (Parrish Property Services, effective 1/1/2025):**

Commercial Appraisal Review:	\$275.00 (up to \$10MM in value) \$330.00 (over \$10MM in value)
Residential Appraisal Review:	\$85.00
Residential Evaluation Review:	\$75.00
AVM Review:	\$50.00
Com. Evaluations Value & Picture (Metro):	\$500.00
Res. Evaluations Value & Picture (Metro):	\$280.00
Res. Validations of Existing Appraisal & Picture:	\$250.00
Com. Validations of Existing Appraisal & Picture:	\$350.00

***Evaluation Fees (Stacy Duffy, effective 1/1/2025):**

Res. Evaluations:	\$250.00
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***Third Party Fees:**

Mortgage Certification	\$10.00
Appraisal Shield Coordination Fee	10% of the appraisal fee w/ cap at \$75.00
Appraisal Shield: "Additional Orders"	\$25.00
Appraisal Shield: Cancellation Fee	\$15.00
Construction Inspection Fee	\$450.00 (May vary by property location)
Stem wall (Consumer Construction)	\$225.00 (May vary by Inspector)

*All deviations of FPB issued fees must be approved by the Bank President.

**All deviations of FPB issued fees must be approved by the FPB Bank Board.



Assessment Areas

First Priority Bank's management and board of directors have delineated a primary lending assessment area, as well as a secondary lending assessment area, which meet CRA regulation and do not arbitrarily exclude any low or moderate income areas.

The Primary Lending Areas include: Tulsa County, Mayes County, and Cleveland County.

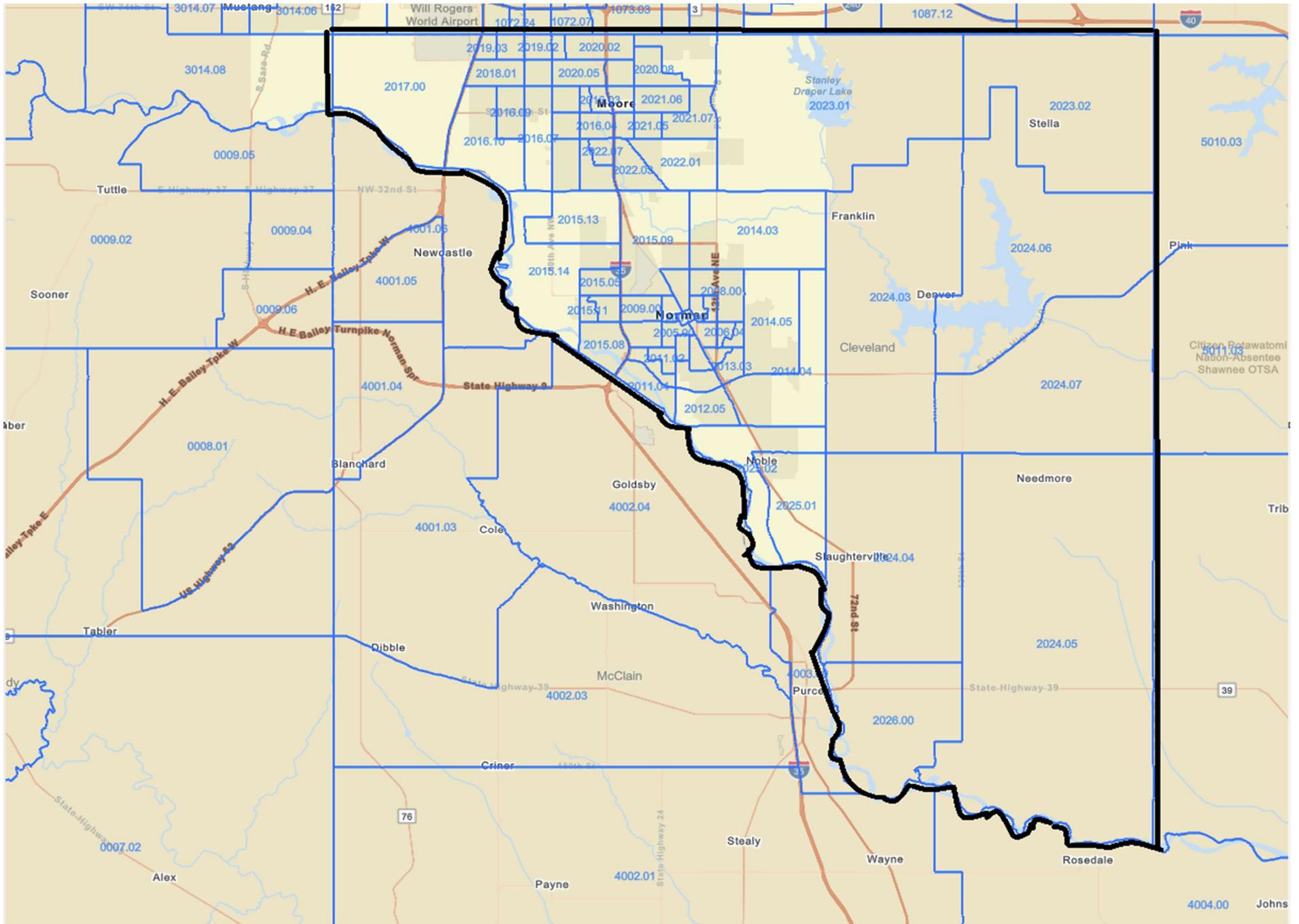
The Secondary Lending Areas include: adjoining counties to Tulsa, Mayes, and Cleveland counties:

- Rogers
- Craig
- Delaware
- Cherokee
- Wagoner
- Okmulgee
- Creek
- Pawnee
- Osage
- Washington
- Oklahoma
- Pottawatomie
- McClain
- Canadian
- Grady
- Loans secured by Farm Land will be limited to the State of Oklahoma
- Municipal Loans and Leases will be limited to the State of Oklahoma
- Consumer Mortgages (Construction, Portfolio, and ITIN) will be limited to the State of Oklahoma with the primary focus being the Bank's Assessment Area
- Aircraft Loans will be limited to the Continental United States
- Business Manager Lines will be limited to Oklahoma, Arkansas, Missouri, Colorado, Texas, and Kansas
- Loans secured or guaranteed by the full faith and credit of the U.S. Government or U.S. Agency, may be made anywhere in the United States.

Year	State code	County code	County Name	Tract code	Distressed or Underserved Tract	Tract Income Level
2025	40	027	CLEVELAND COUNTY	2001.00	No	0 - Unknown
2025	40	027	CLEVELAND COUNTY	2002.00	No	2 - Moderate
2025	40	027	CLEVELAND COUNTY	2003.00	No	2 - Moderate
2025	40	027	CLEVELAND COUNTY	2004.00	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2005.00	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2006.02	No	0 - Unknown
2025	40	027	CLEVELAND COUNTY	2006.03	No	1 - Low
2025	40	027	CLEVELAND COUNTY	2006.04	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2007.00	No	0 - Unknown
2025	40	027	CLEVELAND COUNTY	2008.00	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2009.00	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2010.00	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2011.02	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2011.03	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2011.04	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2012.01	No	1 - Low
2025	40	027	CLEVELAND COUNTY	2012.02	No	0 - Unknown
2025	40	027	CLEVELAND COUNTY	2012.04	No	2 - Moderate
2025	40	027	CLEVELAND COUNTY	2012.05	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2013.02	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2013.03	No	2 - Moderate
2025	40	027	CLEVELAND COUNTY	2014.03	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2014.04	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2014.05	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2015.05	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2015.08	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2015.09	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2015.11	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2015.12	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2015.13	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2015.14	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2016.02	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2016.03	No	2 - Moderate
2025	40	027	CLEVELAND COUNTY	2016.04	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2016.07	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2016.09	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2016.10	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2016.11	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2016.12	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2017.00	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2018.01	No	4 - Upper
2025	40	027	CLEVELAND COUNTY	2018.02	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2019.02	No	3 - Middle
2025	40	027	CLEVELAND COUNTY	2019.03	No	3 - Middle

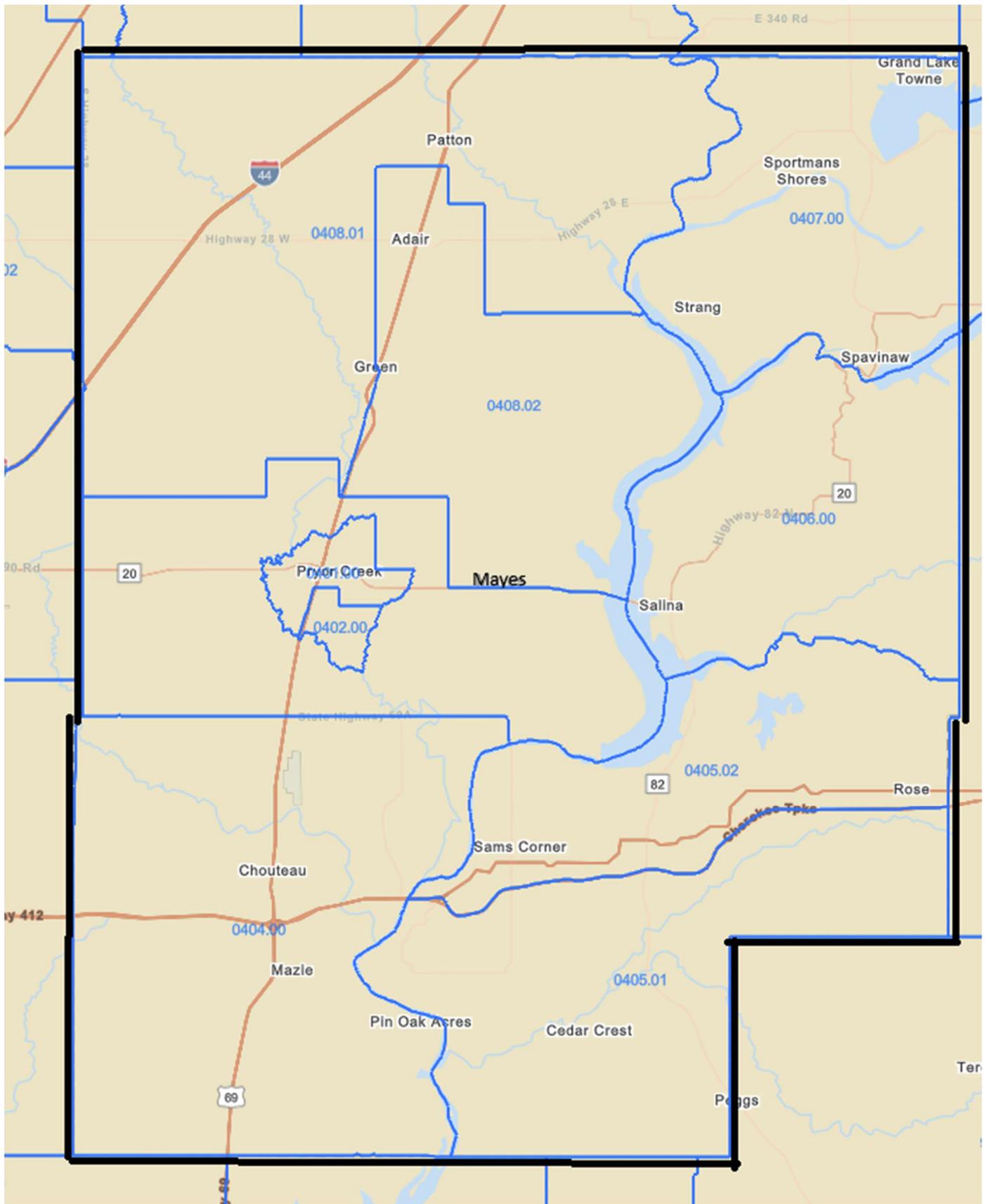
2025 40	027	CLEVELAND COUNTY	2019.04	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2020.02	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2020.04	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2020.05	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2020.06	No	2 - Moderate
2025 40	027	CLEVELAND COUNTY	2020.07	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2020.08	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2021.02	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2021.04	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2021.05	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2021.06	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2021.07	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2022.01	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2022.03	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2022.05	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2022.07	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2022.08	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2023.01	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2023.02	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2024.03	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2024.04	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2024.05	No	4 - Upper
2025 40	027	CLEVELAND COUNTY	2024.06	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2024.07	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2025.01	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2025.02	No	3 - Middle
2025 40	027	CLEVELAND COUNTY	2026.00	No	2 - Moderate

First Priority – Cleveland Assessment Area



Year	State code	County code	County Name	Tract code	Distressed or Underserved Tract	Tract Income Level
2025	40	097	MAYES COUNTY	0401.00	No	2 - Moderate
2025	40	097	MAYES COUNTY	0402.00	No	3 - Middle
2025	40	097	MAYES COUNTY	0403.00	No	4 - Upper
2025	40	097	MAYES COUNTY	0404.00	No	3 - Middle
2025	40	097	MAYES COUNTY	0405.01	No	4 - Upper
2025	40	097	MAYES COUNTY	0405.02	No	3 - Middle
2025	40	097	MAYES COUNTY	0406.00	No	3 - Middle
2025	40	097	MAYES COUNTY	0407.00	No	3 - Middle
2025	40	097	MAYES COUNTY	0408.01	No	3 - Middle
2025	40	097	MAYES COUNTY	0408.02	No	3 - Middle

First Priority Bank – Mayes Assessment Area



Year	State code	County code	County Name	Tract code	Distressed or Underserved Tract	Tract Income Level
2025	40	143	TULSA COUNTY	0002.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0003.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0004.00	No	1 - Low
2025	40	143	TULSA COUNTY	0005.00	No	1 - Low
2025	40	143	TULSA COUNTY	0008.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0009.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0010.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0012.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0013.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0014.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0015.00	No	1 - Low
2025	40	143	TULSA COUNTY	0016.00	No	1 - Low
2025	40	143	TULSA COUNTY	0017.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0018.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0019.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0020.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0021.00	No	0 - Unknown
2025	40	143	TULSA COUNTY	0023.01	No	1 - Low
2025	40	143	TULSA COUNTY	0025.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0027.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0029.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0030.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0031.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0032.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0033.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0034.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0035.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0036.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0037.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0038.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0039.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0040.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0041.01	No	4 - Upper
2025	40	143	TULSA COUNTY	0042.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0043.01	No	4 - Upper
2025	40	143	TULSA COUNTY	0043.02	No	4 - Upper
2025	40	143	TULSA COUNTY	0044.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0045.00	No	4 - Upper
2025	40	143	TULSA COUNTY	0046.00	No	1 - Low
2025	40	143	TULSA COUNTY	0047.00	No	3 - Middle
2025	40	143	TULSA COUNTY	0048.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0049.00	No	2 - Moderate
2025	40	143	TULSA COUNTY	0050.01	No	2 - Moderate
2025	40	143	TULSA COUNTY	0050.02	No	3 - Middle

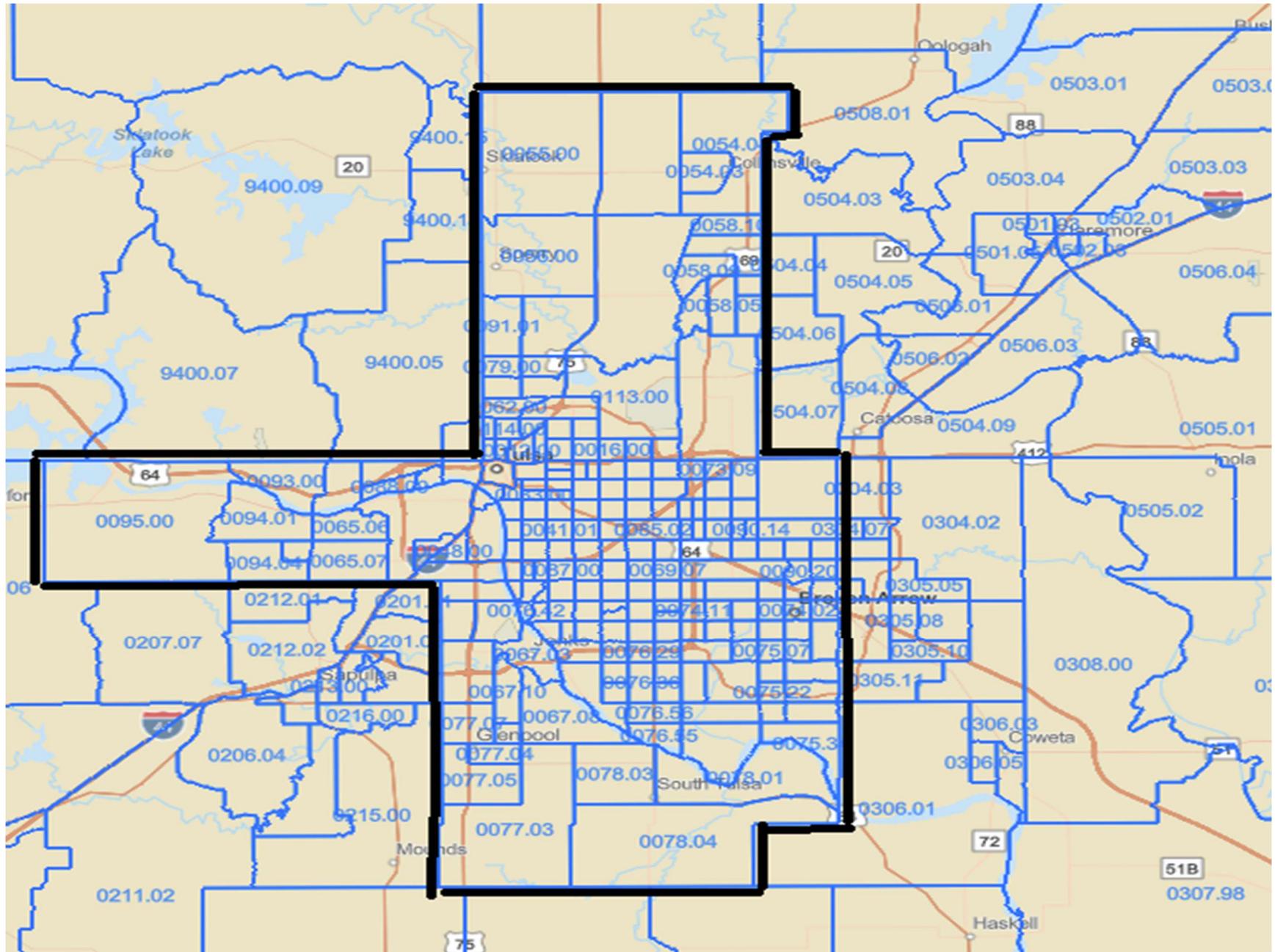
2025 40	143	TULSA COUNTY	0051.00	No	4 - Upper
2025 40	143	TULSA COUNTY	0052.00	No	4 - Upper
2025 40	143	TULSA COUNTY	0053.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0054.01	No	4 - Upper
2025 40	143	TULSA COUNTY	0054.03	No	3 - Middle
2025 40	143	TULSA COUNTY	0054.04	No	4 - Upper
2025 40	143	TULSA COUNTY	0055.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0056.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0057.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0058.01	No	2 - Moderate
2025 40	143	TULSA COUNTY	0058.05	No	3 - Middle
2025 40	143	TULSA COUNTY	0058.08	No	4 - Upper
2025 40	143	TULSA COUNTY	0058.09	No	4 - Upper
2025 40	143	TULSA COUNTY	0058.10	No	4 - Upper
2025 40	143	TULSA COUNTY	0058.11	No	4 - Upper
2025 40	143	TULSA COUNTY	0058.12	No	4 - Upper
2025 40	143	TULSA COUNTY	0058.13	No	2 - Moderate
2025 40	143	TULSA COUNTY	0059.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0060.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0062.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0065.06	No	4 - Upper
2025 40	143	TULSA COUNTY	0065.07	No	3 - Middle
2025 40	143	TULSA COUNTY	0066.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0067.01	No	2 - Moderate
2025 40	143	TULSA COUNTY	0067.03	No	2 - Moderate
2025 40	143	TULSA COUNTY	0067.08	No	4 - Upper
2025 40	143	TULSA COUNTY	0067.09	No	4 - Upper
2025 40	143	TULSA COUNTY	0067.10	No	4 - Upper
2025 40	143	TULSA COUNTY	0067.11	No	3 - Middle
2025 40	143	TULSA COUNTY	0067.12	No	4 - Upper
2025 40	143	TULSA COUNTY	0067.13	No	3 - Middle
2025 40	143	TULSA COUNTY	0068.01	No	2 - Moderate
2025 40	143	TULSA COUNTY	0068.03	No	2 - Moderate
2025 40	143	TULSA COUNTY	0068.04	No	2 - Moderate
2025 40	143	TULSA COUNTY	0069.01	No	4 - Upper
2025 40	143	TULSA COUNTY	0069.02	No	4 - Upper
2025 40	143	TULSA COUNTY	0069.03	No	3 - Middle
2025 40	143	TULSA COUNTY	0069.05	No	2 - Moderate
2025 40	143	TULSA COUNTY	0069.06	No	2 - Moderate
2025 40	143	TULSA COUNTY	0069.07	No	3 - Middle
2025 40	143	TULSA COUNTY	0070.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0071.01	No	2 - Moderate
2025 40	143	TULSA COUNTY	0071.02	No	2 - Moderate
2025 40	143	TULSA COUNTY	0072.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.04	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.06	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.08	No	2 - Moderate

2025 40	143	TULSA COUNTY	0073.09	No	3 - Middle
2025 40	143	TULSA COUNTY	0073.10	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.11	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.12	No	2 - Moderate
2025 40	143	TULSA COUNTY	0073.13	No	3 - Middle
2025 40	143	TULSA COUNTY	0073.14	No	2 - Moderate
2025 40	143	TULSA COUNTY	0074.02	No	2 - Moderate
2025 40	143	TULSA COUNTY	0074.08	No	1 - Low
2025 40	143	TULSA COUNTY	0074.09	No	4 - Upper
2025 40	143	TULSA COUNTY	0074.10	No	2 - Moderate
2025 40	143	TULSA COUNTY	0074.11	No	2 - Moderate
2025 40	143	TULSA COUNTY	0074.12	No	4 - Upper
2025 40	143	TULSA COUNTY	0074.13	No	3 - Middle
2025 40	143	TULSA COUNTY	0074.14	No	2 - Moderate
2025 40	143	TULSA COUNTY	0074.15	No	3 - Middle
2025 40	143	TULSA COUNTY	0074.16	No	4 - Upper
2025 40	143	TULSA COUNTY	0074.17	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.03	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.07	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.10	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.11	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.12	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.18	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.19	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.20	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.22	No	3 - Middle
2025 40	143	TULSA COUNTY	0075.23	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.25	No	2 - Moderate
2025 40	143	TULSA COUNTY	0075.26	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.27	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.28	No	4 - Upper
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2025 40	143	TULSA COUNTY	0075.30	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.31	No	4 - Upper
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2025 40	143	TULSA COUNTY	0075.35	No	4 - Upper
2025 40	143	TULSA COUNTY	0075.36	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.08	No	1 - Low
2025 40	143	TULSA COUNTY	0076.11	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.12	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.13	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.14	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.15	No	2 - Moderate
2025 40	143	TULSA COUNTY	0076.16	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.17	No	2 - Moderate

2025 40	143	TULSA COUNTY	0076.19	No	3 - Middle
2025 40	143	TULSA COUNTY	0076.29	No	3 - Middle
2025 40	143	TULSA COUNTY	0076.30	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.31	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.32	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.33	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.34	No	4 - Upper
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2025 40	143	TULSA COUNTY	0076.38	No	4 - Upper
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2025 40	143	TULSA COUNTY	0076.42	No	2 - Moderate
2025 40	143	TULSA COUNTY	0076.43	No	2 - Moderate
2025 40	143	TULSA COUNTY	0076.44	No	2 - Moderate
2025 40	143	TULSA COUNTY	0076.45	No	3 - Middle
2025 40	143	TULSA COUNTY	0076.46	No	2 - Moderate
2025 40	143	TULSA COUNTY	0076.47	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.48	No	3 - Middle
2025 40	143	TULSA COUNTY	0076.49	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.50	No	2 - Moderate
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2025 40	143	TULSA COUNTY	0076.52	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.53	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.54	No	4 - Upper
2025 40	143	TULSA COUNTY	0076.55	No	3 - Middle
2025 40	143	TULSA COUNTY	0076.56	No	4 - Upper
2025 40	143	TULSA COUNTY	0077.03	No	4 - Upper
2025 40	143	TULSA COUNTY	0077.04	No	2 - Moderate
2025 40	143	TULSA COUNTY	0077.05	No	4 - Upper
2025 40	143	TULSA COUNTY	0077.06	No	3 - Middle
2025 40	143	TULSA COUNTY	0077.07	No	3 - Middle
2025 40	143	TULSA COUNTY	0078.01	No	3 - Middle
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2025 40	143	TULSA COUNTY	0085.01	No	2 - Moderate
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2025 40	143	TULSA COUNTY	0086.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0087.00	No	4 - Upper
2025 40	143	TULSA COUNTY	0088.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0089.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0090.06	No	2 - Moderate

2025 40	143	TULSA COUNTY	0090.08	No	1 - Low
2025 40	143	TULSA COUNTY	0090.10	No	3 - Middle
2025 40	143	TULSA COUNTY	0090.11	No	1 - Low
2025 40	143	TULSA COUNTY	0090.12	No	2 - Moderate
2025 40	143	TULSA COUNTY	0090.13	No	2 - Moderate
2025 40	143	TULSA COUNTY	0090.14	No	4 - Upper
2025 40	143	TULSA COUNTY	0090.15	No	4 - Upper
2025 40	143	TULSA COUNTY	0090.16	No	4 - Upper
2025 40	143	TULSA COUNTY	0090.17	No	3 - Middle
2025 40	143	TULSA COUNTY	0090.18	No	4 - Upper
2025 40	143	TULSA COUNTY	0090.19	No	3 - Middle
2025 40	143	TULSA COUNTY	0090.20	No	4 - Upper
2025 40	143	TULSA COUNTY	0090.21	No	3 - Middle
2025 40	143	TULSA COUNTY	0091.01	No	1 - Low
2025 40	143	TULSA COUNTY	0091.04	No	2 - Moderate
2025 40	143	TULSA COUNTY	0092.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0093.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0094.01	No	3 - Middle
2025 40	143	TULSA COUNTY	0094.03	No	3 - Middle
2025 40	143	TULSA COUNTY	0094.04	No	3 - Middle
2025 40	143	TULSA COUNTY	0095.00	No	3 - Middle
2025 40	143	TULSA COUNTY	0113.00	No	2 - Moderate
2025 40	143	TULSA COUNTY	0114.00	No	2 - Moderate

First Priority Bank – Tulsa Assessment Area



PRYORITY.BANK

Loan to Deposit Ratios

	2024	2025
1 st Quarter	87.76%	90.21%
2 nd Quarter	87.81%	90.60%
3 rd Quarter	88.00%	88.79%
4 th Quarter	90.38%	90.14%



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).