

PUBLIC DISCLOSURE

January 13, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Exchange Bank
Certificate Number: 428

510 West Main Street
Henryetta, Oklahoma 74437

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 **Outstanding**.

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

- The loan-to-deposit (LTD) ratio 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 excellent dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution did not receive any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

DESCRIPTION OF INSTITUTION

American Exchange Bank (AEB) maintains its headquarters in Henryetta, Oklahoma. AEB received a "Satisfactory" rating at its previous FDIC Performance Evaluation on February 10, 2020, based on Small Institution CRA Examination Procedures.

AEB maintains two full-service locations in Henryetta and Okemah, Oklahoma. The bank also has a limited-service drive-in branch in Henryetta, Oklahoma. Since the previous evaluation, the bank opened its branch in Okemah, Oklahoma on July 1, 2020. The bank did not close any branches since the prior evaluation. Branch hours and days of service remain consistent with area and industry norms. AEB did not engage in any acquisition or merger activity since the prior evaluation.

The bank offers a variety of loan products including commercial, agricultural, residential, consumer, and construction loans, primarily focusing on home mortgage lending. AEB also offers a variety of deposit services including checking, savings, certificates of deposit accounts, and individual retirement accounts. Alternative banking services include internet banking, mobile banking, and three non-deposit taking ATMs.

As of September 30, 2025, Reports of Condition and Income, AEB reported total assets of \$95.0 million, total loans of \$75.2 million and total deposits of \$80.9 million. Since the previous evaluation, total assets increased by 35.6 percent, total loans increased by 37.5 percent, and deposits increased 32.8 percent. As presented in the following table, the mix of outstanding loans reflects a distribution

generally supportive of the institution’s primary business focus, with home mortgage and agricultural loans representing the largest categories of loans outstanding.

Loan Portfolio Distribution as of 09/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	2,935	3.9
Secured by Farmland	2,514	3.3
Secured by 1-4 Family Residential Properties	42,369	56.4
Secured by Multifamily (5 or more) Residential Properties	374	0.5
Secured by Nonfarm Nonresidential Properties	7,099	9.4
Total Real Estate Loans	55,291	73.6
Commercial and Industrial Loans	3,467	4.6
Agricultural Production and Other Loans to Farmers	8,598	11.4
Consumer Loans	7,769	10.3
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	32	<0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	75,157	100.0
<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 bank’s ability to meet its AA credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its performance. AEB designated two Oklahoma AAs, the Tulsa Metropolitan Statistical Area (MSA) and the Oklahoma Non-MSA as outlined in the following table. The Oklahoma Non-MSA AA is a new AA since the prior evaluation. The AAs meet the technical requirements of the CRA. The following table provides details regarding composition of each AA. Refer to the individual AA sections of this evaluation for details.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Tulsa MSA	Okmulgee	11	1
Oklahoma Non-MSA	McIntosh and Okfuskee	12	1
<i>Source: 2024 Bank Data; 2020 U.S. Census Data</i>			

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated February 10, 2020, to the current evaluation dated January 13, 2026. Examiners used the Small Institution CRA Examination Procedures, which include the Lending Test, to evaluate CRA performance. The appendix lists the test’s criteria.

Examiners applied full-scope procedures to the Tulsa MSA AA and placed greater weight on the Tulsa MSA AA’s performance, as this area contains a majority of lending and deposit activity as seen in the following table. Examiners also used full-scope procedures to evaluate performance in the Oklahoma Non-MSA AA due to the addition of this AA since the prior evaluation which has not yet received full-scope review. The following table shows the breakdown of the activities in each AA.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Tulsa MSA AA	18,083	79.0	74,749	88.5	1	50.0
Oklahoma Non-MSA AA	4,795	21.0	9,728	11.5	1	50.0
Total	22,878	100.0	84,477	100.0	2	100.0
<i>Source: Bank Data; FDIC Summary of Deposits (06/30/2025); Due to rounding, totals may not equal 100.0.</i>						

Activities Reviewed

Small Institution CRA Examination Procedures require examiners to determine the bank’s major product lines for review. Examiners may select from the same loan categories used for Large Bank CRA Evaluations: home mortgage, small business, small farm, and consumer loans. The following table details the AEB’s loan originations and purchases over the most recent completed calendar year by loan type.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	2,837	7.6	11	1.0
Secured by Farmland	1,393	3.7	9	0.8
Secured by 1-4 Family Residential Properties	14,509	38.9	145	13.6
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	1,468	3.9	18	1.7
Commercial and Industrial Loans	2,788	7.5	46	4.3
Agricultural Loans	8,250	22.1	272	25.4
Consumer Loans	6,085	16.3	568	53.1
Other Loans	0	0.0	0	0.0
Total Loans	37,330	100.0	1,069	100.0
<i>Source: 2024 Bank Data. Due to rounding, totals may not equal 100.0.</i>				

Considering the dollar volume and number of loans originated during 2024 based on the bank’s loan data download, as well as management’s stated business strategy, examiners determined the bank’s major product lines of those typically considered consist of small farm and home mortgage loans. Since the other categories typically reviewed for CRA do not represent major product lines, considering both number and dollar volume, they would not materially affect any conclusions or the rating. Therefore, this evaluation does not include a review of small business or consumer loans. Bank records indicate the lending focus and product mix remained generally consistent throughout the evaluation period.

This evaluation includes a review of the universe of 279 small farm loans totaling \$8.4 million originated or purchased in 2024, which represents the most recent calendar year of available data. Since readily available gross annual revenue data was not available for the universe of loans, examiners selected a sample of 55 small farm loans totaling \$1.8 million originated inside the AAs to evaluate the borrower profile criterion. D&B data for 2024 provided a standard of comparison for small farm loans reviewed.

AEB reports mortgage loans pursuant to the Home Mortgage Disclosure Act (HMDA). Therefore, this evaluation includes a review of the home mortgage loans reported on the bank’s 2023 and 2024 HMDA Loan Application Registers, as follows:

- 2023: 104 home mortgage loans totaling \$9.1 million
- 2024: 69 home mortgage loans totaling \$7.8 million

Examiners did not identify any significant trends between the different years’ data that materially affect conclusions. Therefore, the geographic distribution and borrower profile analyses present HMDA data for 2024, the most recent year for which aggregate data exists. However, the assessment area concentration section presents HMDA data for all years reviewed. Aggregate data for 2024 served as the primary standard of comparison for home mortgage lending performance. Examiners also considered the 2020 U.S. Census data in the home mortgage lending analysis; however, HMDA aggregate data is typically a better indicator of market conditions and loan demand.

Examiners considered the universes by dollar volume and number of loans originated as well as management’s stated business strategy to determine the loan product weighting when arriving at overall conclusions. Consequently, small farm loans received heavier weighting when arriving at overall conclusions. The following table represents the loan products reviewed.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Farm	279	8,353	279	8,353
Home Mortgage	69	7,813	69	7,813
<i>Source: 2024 Bank Data; 2024 HMDA Reported Data</i>				

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 individual performance factors because the number of loans better indicates the number of households and businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

AEB demonstrated outstanding performance regarding the Lending Test. Excellent records regarding geographic distribution and borrower profile performances primarily support this conclusion. The bank also demonstrated a reasonable record regarding its LTD ratio and originated a majority of loans inside the AAs.

Loan-to-Deposit Ratio

The LTD is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AA credit needs. The LTD ratio, calculated from Reports of Conditions and Income data, averaged 87.6 percent over the past 23 quarters, from March 31, 2020, to September 30, 2025, representing an increase from the 80.3 percent average LTD at the prior evaluation. The ratio ranged from a high of 95.4 percent on December 31, 2024, to a low of 82.7 percent on March 31, 2021. Although the ratio remained relatively stable during the evaluation period, the ratio is currently reflecting a generally increasing trend beginning June 30, 2024.

Examiners compared AEB's average net LTD ratio to three comparable institutions operating in or around AEB's AAs with somewhat similar asset sizes and product lines. As seen in the following table, AEB posted the highest ratio out of the four total ratios listed.

LTD Ratio Comparison		
Bank	Total Assets as of 09/30/2025 (\$000s)	Average Net LTD Ratio (%)
American Exchange Bank, Henryetta, Oklahoma	95,046	87.6
The Peoples National Bank of Checotah, Checotah, Oklahoma	164,255	34.0
Bank of Eufaula, Eufaula, Oklahoma	91,766	31.2
Patrons Bank, National Association, Okmulgee, Oklahoma	294,207	64.1

Source: Reports of Condition and Income 03/31/2020 - 09/30/2025

Assessment Area Concentration

The institution originated a majority of its loans inside its AAs. The following table shows that AEB originated a majority of its small farm and home mortgage loans, by both number and dollar volume, inside the bank's AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	207	74.2	72	25.8	279	6,714	80.4	1,639	19.6	8,353
Home Mortgage										
2023	85	81.7	19	18.3	104	7,395	81.4	1,685	18.6	9,080
2024	56	81.2	13	18.8	69	6,011	76.9	1,802	23.1	7,813
Subtotal	141	81.5	32	18.5	173	13,406	79.4	3,487	20.6	16,893

Source: 2023 & 2024 HMDA Reported Data; 2024 Bank Data; Due to rounding, totals may not equal 100.0.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the AAs. Consistent performance in both AAs supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts when arriving at conclusions for this performance factor. Each AA section includes a more detailed discussion of the bank’s geographic distribution performance.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, excellent penetration among farms of different sizes and individuals of different income levels (including low- and moderate-income). Consistent performance in both AAs supports this conclusion. Examiners focused on the percentage by number of loans to farms with gross annual revenues of \$1 million or less and to low- and moderate-income individuals when arriving at conclusions for this performance factor. Each AA section includes a more detailed discussion of the bank’s borrower profile performance.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

TULSA MSA ASSESSMENT AREA – Full-Scope Review

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN
TULSA MSA AA**

Since the previous evaluation, the Tulsa MSA AA no longer includes a portion of McIntosh County and

expanded to include the entirety of Okmulgee County rather than a portion. AEB maintains its main office, one limited-service drive-in office, and two ATMs within this AA. 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

The Tulsa MSA AA census tracts reflect the following income designations based on 2020 U.S. Census data: 2 low-, 3 moderate-, and 6 middle-income census tracts. The following table illustrates select demographic, housing, and business information for the bank’s Tulsa MSA AA.

Demographic Information of the Assessment Area Tulsa MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	11	18.2	27.3	54.5	0.0	0.0
Population by Geography	36,706	14.7	30.8	54.5	0.0	0.0
Housing Units by Geography	17,854	16.3	31.3	52.3	0.0	0.0
Owner-Occupied Units by Geography	10,328	10.9	26.4	62.8	0.0	0.0
Occupied Rental Units by Geography	4,316	24.4	42.4	33.3	0.0	0.0
Vacant Units by Geography	3,210	23.1	32.5	44.4	0.0	0.0
Businesses by Geography	2,823	18.5	30.8	50.7	0.0	0.0
Farms by Geography	132	1.5	10.6	87.9	0.0	0.0
Family Distribution by Income Level	9,587	32.0	18.5	21.5	28.0	0.0
Household Distribution by Income Level	14,644	33.1	17.5	18.1	31.3	0.0
Median Family Income MSA - Tulsa MSA		\$72,203	Median Housing Value			\$ 89,992
			Median Gross Rent			\$676
			Families Below Poverty Level			14.5%
<i>Source: 2020 U.S. Census Data; 2024 D&B Data; Due to rounding, totals may not equal 100.0.</i>						
<i>*The NA category consists of geographies that have not been assigned an income classification.</i>						

Examiners used the applicable Federal Financial Institutions Examination Council (FFIEC) estimated median family income (MFI) to analyze home mortgage loans for the borrower profile criterion. The following table shows applicable income ranges based on the 2024 estimated MFI of \$85,300.

Median Family Income Ranges Tulsa, Oklahoma MSA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$85,300	< \$42,650	\$42,650 to < \$68,240	\$68,240 to < \$102,360	≥\$102,360
<i>Source: FFIEC</i>					

According to research, the area’s largest employers include Saint Francis Anchor Glass, Tate & Lyle, Covington Aircraft, and Great Plains. The following table shows annual unemployment rates in the

bank’s AA remained stable, but landed above the State of Oklahoma and national averages.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Okmulgee County	4.2	4.2	4.2
State of Oklahoma	3.0	3.2	3.3
National Average	3.7	3.6	4.0

Source: Bureau of Labor Statistics

Competition

The AA reflects a low level of competition for financial services considering the AA’s population. According to the FDIC Deposit Market Share Report as of June 30, 2025, five financial institutions operate ten offices within the AA. Of these institutions, AEB ranked 3rd with 12.9 percent deposit market share.

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 opportunities.

Examiners conducted an interview with a representative of an economic development organization serving the AA. The contact was knowledgeable of the economic conditions of the AA, helping to assess the area’s current economic conditions, community credit needs, and potential opportunities for bank involvement. The contact stated that affordable housing represents the primary need in the area. Additionally, there are community development projects underway focusing on housing rather than commercial to help resolve the inadequate supply of affordable involvement. The contact mentioned a noticeable disparity in wages when describing the income characteristics of the community, noting the high rent prices. The contact also stated the economic condition of the area is similar to that of the nation but has seen an upward trend recently. Overall, the contact believed that local institutions are responsive to the credit needs of the community.

Credit Needs

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners determined that home mortgage represents the primary credit need in the Tulsa MSA AA.

**CONCLUSIONS ON PERFORMANCE CRITERIA IN
TULSA MSA AA**

LENDING TEST

AEB demonstrated an excellent record in the Tulsa MSA regarding the Lending Test. Excellent geographic distribution and borrower profile records support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent penetration throughout the Tulsa MSA AA. Excellent records of small farm and home mortgage lending support this conclusion.

Small Farm Loans

The geographic distribution of small farm loans reflects excellent dispersion throughout the Tulsa MSA AA. As seen in the following table, the bank’s level of lending in low-income census tracts is on par with demographic data, reflecting reasonable performance. The table further shows that AEB’s lending performance in moderate-income census tracts exceeds demographic data by 25.6 percentage points, reflecting excellent performance. Examiners placed greater weight on the bank’s performance in moderate-income geographies given the greater opportunities as suggested by demographic data.

Geographic Distribution of Small Farm Loans Tulsa MSA AA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Low	1.5	1	1.5	33	1.8
Moderate	10.6	25	36.2	478	26.1
Middle	87.9	43	62.3	1,322	72.1
Upper	0.0	0	0.0	0	0.0
Not Available	0.0	0	0.0	0	0.0
Total	100.0	69	100.0	1,833	100.0

Source: 2024 D&B Data; 2024 Bank Data; Due to rounding, totals may not equal 100.0.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the Tulsa MSA AA. The following table shows the bank’s level of lending trails aggregate data by 3.6 percentage points in low-income census tracts, reflecting reasonable performance. The table further shows that in moderate-income tracts, the bank’s level of lending exceeds aggregate data by 10.4 percentage points, reflecting excellent performance. Examiners placed greater weight on the institution’s performance in moderate-income geographies given the greater opportunities as suggested by aggregate data.

Geographic Distribution of Home Mortgage Loans Tulsa MSA AA						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	10.9	10.7	3	7.1	545	13.3
Moderate	26.4	25.3	15	35.7	960	23.5
Middle	62.8	64.1	24	57.1	2,589	63.2
Upper	0.0	0.0	0	0.0	0	0.0
Not Available	0.0	0.0	0	0.0	0	0.0
Total	100.0	100.0	42	100.0	4,094	100.0

Source: 2020 U.S. Census Data; 2024 HMDA Reported Data; 2024 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among farms of different sizes and individuals of different income levels (including low- and moderate-income) in the Tulsa MSA AA. Excellent performance regarding small farm lending lifted reasonable performance regarding home mortgage lending which supports this conclusion.

Small Farm Loans

The distribution of borrowers reflects excellent penetration among small farms of different sizes in the Tulsa MSA AA. The following table shows the bank originated all of the sampled small farm loans to farms with gross annual revenue of \$1 million or less, reflecting excellent performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Tulsa MSA AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<= \$1,000,000	99.2	16	100.0	722	100.0
>= \$1,000,000	0.0	0	0.0	0	0.0
Revenue Not Available	0.8	0	0.0	0	0.0
Total	100.0	16	100.0	722	100.0

Source: 2024 D&B Data; 2024 Bank Data; Due to rounding, totals may not equal 100.0.

Home Mortgage Loans

The distribution of home mortgage loan borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels in the Tulsa MSA AA. The following table shows AEB's level of lending to low-income borrowers exceeds aggregate data by 16.8 percentage points which reflects excellent performance. The table further shows the bank's lending to moderate-income borrowers trails aggregate data by 0.9 percentage points, reflecting a reasonable record. Examiners placed greater weight on the bank's performance to moderate-income borrowers given the greater opportunities as suggested by the aggregate data.

Distribution of Home Mortgage Loans by Borrower Income Level Tulsa MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	32.0	9.4	11	26.2	463	11.3
Moderate	18.5	19.9	8	19.0	696	17.0
Middle	21.5	19.9	11	26.2	948	23.2
Upper	28.0	22.6	7	16.7	1,450	35.4
Not Available	0.0	28.3	5	11.9	537	13.1
Total	100.0	100.0	42	100.0	4,094	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Reported Data; 2024 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.</i>						

OKLAHOMA NON-MSA AA – Full-Scope Review

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

Since the prior evaluation, the bank opened a branch in Okfuskee County which resulted in the addition of a new AA located in the Oklahoma Non-MSA. The Oklahoma Non-MSA AA consists of McIntosh and Okfuskee counties in their entirety. AEB operates one full-service branch and one ATM in this AA. 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

The Oklahoma Non-MSA AA census tracts reflect the following income designations according to the 2020 U.S. Census data: 4 moderate- and 8 middle-income census tracts. The following table provides additional demographic data for the Oklahoma Non-MSA AA.

Demographic Information of the Assessment Area Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	12	0.0	33.3	66.7	0.0	0.0
Population by Geography	30,251	0.0	38.0	62.0	0.0	0.0
Housing Units by Geography	19,164	0.0	31.0	69.0	0.0	0.0
Owner-Occupied Units by Geography	9,352	0.0	30.6	69.4	0.0	0.0
Occupied Rental Units by Geography	2,900	0.0	54.8	45.2	0.0	0.0
Vacant Units by Geography	6,912	0.0	21.7	78.3	0.0	0.0
Businesses by Geography	2,021	0.0	39.6	60.4	0.0	0.0
Farms by Geography	115	0.0	27.0	73.0	0.0	0.0
Family Distribution by Income Level	8,356	27.2	20.3	21.4	31.1	0.0
Household Distribution by Income Level	12,252	29.8	17.5	16.9	35.8	0.0
Median Family Income – Oklahoma Non-MSA		\$58,565	Median Housing Value Median Gross Rent Families Below Poverty Level			\$ 114,078 \$610 18.5%
<i>Source: 2020 Census; 2024 D&B Data; Due to rounding, totals may not equal 100.0.</i>						
<i>* The NA category consists of geographies that have not been assigned an income classification.</i>						

As previously noted, examiners used the applicable FFIEC estimated MFI levels to analyze home mortgage loans for the borrower profile criterion. The following table shows applicable income ranges based on the 2024 estimated MFI of \$69,000.

Median Family Income Ranges Oklahoma Non-MSA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$69,000	< \$34,500	\$34,500 to < \$55,200	\$55,200 to < \$82,800	≥\$82,800
<i>Source: FFIEC</i>					

According to research, the area’s largest employers include Eufaula Public Schools, Muscogee (Creek) Nation, Cherokee Nation Businesses, and Integris Healthcare System. The following table shows annual unemployment rates for both counties in the bank’s AA remained generally stable but landed above the State of Oklahoma and national averages.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Okfuskee County	4.2	4.4	4.3
McIntosh County	4.9	5.3	5.4
State of Oklahoma	3.0	3.2	3.3
National Average	3.7	3.6	4.0
<i>Source: Bureau of Labor Statistics</i>			

Competition

The AA reflects a moderate level of competition for financial services. According to the FDIC Deposit Market Share report as of June 30, 2025, 9 financial institutions operate 13 offices within the bank's AA. Of these institutions, AEB ranked 9th with 1.9 percent deposit market share.

Credit Needs

Considering information obtained from bank management and demographic and economic data, examiners determined that home mortgage and small farm loans represent the primary credit needs in the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA NON-MSA AA

LENDING TEST

AEB demonstrated an excellent record in the Oklahoma Non-MSA AA regarding the Lending Test. Excellent geographic distribution and borrower profile records support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the Oklahoma Non-MSA AA. Excellent performance regarding small farm and home mortgage loans supports this conclusion. Since the AA does not contain any low-income census tracts, examiners focused on the bank's performance in the moderate-income census tracts in the AA when arriving at conclusions for this performance factor.

Small Farm Loans

The geographic distribution of small farm loans reflects excellent penetration throughout the Oklahoma Non-MSA AA. The following table shows AEB's lending levels in moderate-income census tracts exceeds demographic data by 26.6 percentage points, reflecting excellent performance.

Geographic Distribution of Small Farm Loans Oklahoma Non-MSA AA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	27.0	74	53.6	2,261	46.3
Middle	73.0	64	46.4	2,620	53.7
Upper	0.0	0	0.0	0	0.0
Not Available	0.0	0	0.0	0	0.0
Total	100.0	138	100.0	4,881	100.0

Source: 2024 D&B Data; 2024 Bank Data; Due to rounding, totals may not equal 100.0.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the Oklahoma Non-MSA AA. The following table shows AEB’s lending levels in moderate-income census tracts exceeds aggregate data by 28.8 percentage points, reflective of excellent performance.

Geographic Distribution of Home Mortgage Loans Oklahoma Non-MSA AA						
Tract Income Level	% of Owner Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	0.0	0.0	0	0.0	0	0.0
Moderate	30.6	28.3	8	57.1	766	40.0
Middle	69.4	71.2	6	42.9	1,151	60.0
Upper	0.0	0.0	0	0.0	0	0.0
NA	0.0	0.5	0	0.0	0	0.0
Total	100.0	100.0	14	100.0	1,917	100.0

Source: 2020 U.S. Census Data; 2024 HMDA Reported Data; 2024 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among farms of different sizes and individuals of different income levels (including low- and moderate-income) in the Oklahoma Non-MSA AA. Excellent small farm and home mortgage lending performance support this conclusion.

Small Farm Loans

The distribution of borrowers reflects excellent penetration among small farms of different sizes in the Oklahoma Non-MSA AA. The following table shows the bank originated all of the sampled small farm loans to farms with gross annual revenue of \$1 million or less, reflecting excellent performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Oklahoma Non-MSA AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<= \$1,000,000	100.0	39	100.0	1,128	100.0
> \$1,000,000	0.0	0	0.0	0	0.0
Revenue Not Available	0.0	0	0.0	0	0.0
Total	100.0	39	100.0	1,128	100.0

Source: 2024 D&B Data; 2024 Bank Data; Due to rounding, totals may not equal 100.0.

Home Mortgage Loans

The distribution of home mortgage loan borrowers reflects excellent penetration among individuals of different income levels in the Oklahoma Non-MSA AA. The following table shows AEB did not originate any loans to low-income borrowers; however, the bank’s level trails aggregate data by 4.9 percentage points, reflecting reasonable performance. The table further shows the bank’s level of

lending to moderate-income borrowers exceeds aggregate data by 21.7 percentage points, reflecting excellent performance. Examiners placed greater weight on performance to moderate-income borrowers given the level of opportunities as suggested by aggregate data.

Distribution of Home Mortgage Loans by Borrower Income Level Oklahoma Non-MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	27.2	4.9	0	0.0	0	0.0
Moderate	20.3	14.0	5	35.7	405	21.1
Middle	21.4	18.4	1	7.1	308	16.1
Upper	31.1	43.1	8	57.1	1,204	62.8
NA	0.0	19.6	0	0.0	0	0.0
Total	100.0	100.0	14	100.0	1,917	100.0
<i>Source: 2020 U.S. Census Data; 2024 HMDA Reported Data; 2024 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.</i>						

APPENDICES

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 institution'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).

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 institution 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.

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.

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.

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.

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 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.

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.