

**THE BANK OF THE WEST
THOMAS, OK**

COMMUNITY REINVESTMENT ACT (CRA) STATEMENT

INTRODUCTION AND COMMENTS

The Community Reinvestment Act of 1977 (CRA) and the regulations promulgated pursuant thereto by Bank's regulatory agencies are intended to encourage banks and their financial institutions to fulfill their continuing and affirmative obligation to help meet the credit needs of their respective communities, including low and moderate income neighborhoods, consistent with the safe and sound operation of these institutions. The Board of Directors has implemented this Community Reinvestment Act Statement without discrimination due to sex, race, creed, color, age, religion, national origin, or marital status.

In this regard, The Bank of The West, Thomas, OK, hereinafter generally referred to as ("Bank") has developed and adopted this Community Reinvestment Act Statement which contains the following materials under the headings indicated:

1. Written Comments from the Public.
2. Public section of most recent CRA examination.
3. List of branches, street addresses,
4. List of branches opened or closed during current year and each of the prior two years.
5. List of services offered. (hours of operation, deposit products, transactions, fees, etc.)
6. Determination of Assessment Area.
7. Loan to Deposit ratio for each calendar quarter of the prior year.
8. Types of credit.
9. Copy of CRA Notice.
10. Description of bank's efforts to help meet all the needs of Assessment Area, whether it be special credit programs or credit needs.
11. CRA advertising.
12. Officers and Directors.
13. Management's CRA Review.

1. The Bank is required to maintain a Public File containing any written comments from the public it receives relating to the banks performance in helping meet community credit needs and the bank's response to those, if any, for the past 2 years. As of January 1, 2024, the bank has not received any comments.
2. Results of most recent CRA Examination - See Attached Public Disclosure.

3. The Bank of The West is a subsidiary owned by the holding company, BancWest, Inc. The Bank of The West has four convenient locations to serve our communities. The access to these banks is excellent as you can drive right up to the front door at all locations. The bank's branches, their street addresses, and geographies are as follows:

Branch	Address	MSA/MD Code	State Code	County	Census Tract	Tract Income Level	Underserved or Distressed Tract
Main Bank	101 S. Main St Thomas, OK 73669	N/A	40 Oklahoma	039 Custer	9610.00	Middle	No
Clinton Branch	One Wheatland Plaza Clinton, OK 73601	N/A	40 Oklahoma	039 Custer	9604.01	Upper	No
Leedey Branch	401 S. Main St Leedey, OK 73654	N/A	40 Oklahoma	043 Dewey	9593.00	Middle	Yes
OKC Branch	4801 Gaillardia Parkway Suite 190 Oklahoma City, OK 73142	36420	40 Oklahoma	109 Oklahoma	1085.34	Upper	No

4. The Bank of The West has not closed any branch offices during the past 2 years.
5. Office hours are 9:00 a.m. to 3:00 p.m. at all locations with the drive-in facility at Clinton open from 8:30 a.m. to 6:00 p.m. each weekday and 8:30 a.m. to 12:00 p.m. on Saturday. The drive-in facility at Thomas is open from 8:30 a.m. to 4:00 p.m. each weekday and the drive-in facility at Leedey is open 9:00 a.m. to 3:00 p.m. each weekday. The bank and its branches, in an effort to serve the needs of all the residents of the assessment area, offers numerous types of accounts and services, including consumer checking accounts with no monthly maintenance service charges or minimum balance requirements, interest-bearing checking accounts for consumers, MMDA and savings accounts for consumers and businesses, notary, fax, and photocopy services, night drop services, wire transfer services for customers, internet banking through both web-based and mobile platforms, mobile check deposit, online bill payments, and ATM/Debit Cards for consumer and commercial accounts. The Bank also has twenty-four hour ATM machines located on the bank premises in Thomas, Clinton, and Leedey. Many products and services are made available to customers for free, while other services have a nominal fee associated with them. See exhibit "E" for a fee schedule for our products and services.
6. The Bank of The West has defined its two assessment areas in Oklahoma by defining boundaries and identifying geographies by County and/or Census Tracts. The Western Assessment area is defined as all census tracts in Custer, Dewey, Roger Mills, and Washita Counties. See attached "Exhibit A" for specific Census Tracts included. The Eastern Assessment area is defined as all census tracts in Oklahoma County. The Census Tracts included in the Eastern assessment area are listed in "Exhibit B".

7. The Bank of The West loan to deposit ratio the last four quarters was as follows:

March 31, 2023	92.50%
June 30, 2023	93.30%
September 30, 2023	96.65%
December 31, 2023	104.21%

8. Specific types of credit available: This bank will give consideration to all worthwhile and legal applications for credit. The bank will consider (but not be limited to) the following types of loans:

1. Consumer purpose loans
2. Farm operating, livestock, and machinery
3. Commercial
4. Commercial home construction, purchase, or improvement
5. Farm and commercial real estate
6. Church and non-profit organizations
7. Community Development
8. Small Business Loans
9. FmHA Guaranteed Loans
10. FFA and 4-H project loans
11. Small unsecured loans

9. The Public Notice for CRA for the main office is attached "Exhibit C" and for the branch is attached "Exhibit D". These notices are required by law to be posted in the lobby of each bank and branch.

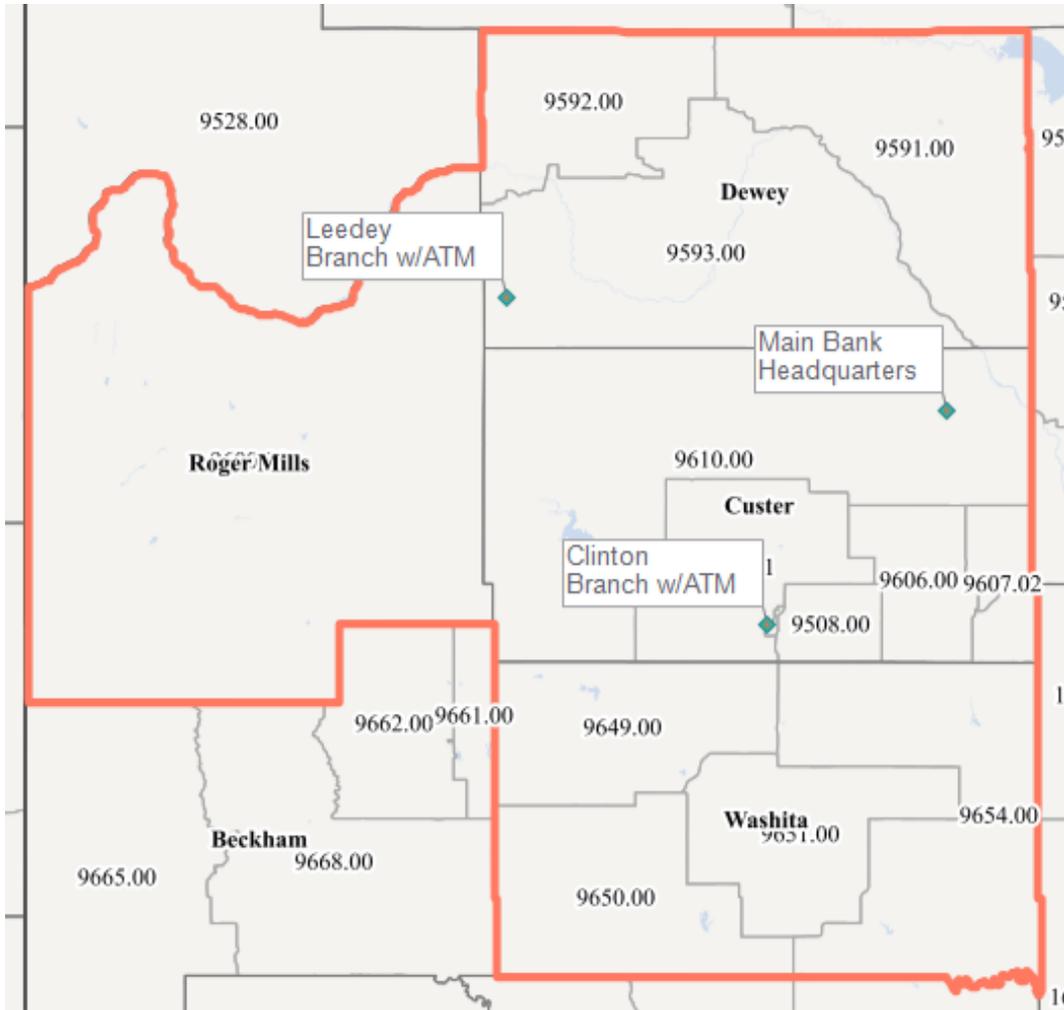
10. The Board of Directors and bank are always looking for ways to help meet the needs of the community. The officers attend SBA seminars, meetings at the local university and area vo-tech, as well as local Chamber of Commerce and civic organization meetings. The community has been in the trend of losing businesses the past few years due to people shopping out of town at the discount stores, etc. The bank has made some new loans just to try to keep people staying at home to shop. The bank helps the schools with their warrants, has helped with several church improvement loans, participates with a local bank on a local public works loan, has in the past purchased several local municipal bonds, as well as a school bond issue. The bank was active in all hospital fund drives. The bank makes numerous small unsecured loans while other banks have minimum loan amounts. The bank feels people need these small loans, especially in the low to moderate income category. The bank helps with the drug abuse prevention program in the school, makes classroom appearances, and sponsors school events. The bank participates in the town Country Christmas festivities, holds community appreciation hamburger feeds, and sponsors church and community events too numerous to mention. During the regular monthly board meeting, the Board of Directors reviews all loans made for the month. In doing so, the board is mindful of the purpose of the Community Reinvestment Act, and periodically evaluates whether or not the Bank is still meeting the needs of the communities.

11. CRA advertising - The Bank places notices on its signage, free of charge, community events, school events, hospital and nursing home news, church news, SBA and vo-tech meetings, and

other community news. The bank helps sponsor Drug Free coloring books and on occasion uses statement stuffers to inform the customers of services or regulatory changes which may affect them.

12. The Bank of The West prides itself in being a locally owned bank, with all of the owners and officers being born and raised in the assessment areas.
13. The branch in Oklahoma City enables the bank to attract new deposits and loans. The directors and new employees have numerous contacts in that community and the bank is excited about our presence in that area rather than trying to compete in other closer cities which already have numerous banks.
14. Management thinks about the Community Reinvestment Act daily and is guided by the Board of Directors. All of the items mentioned above have been the result of the continued efforts of this bank to improve in this area. Considering there are over 10 other financial institutions in our Western Oklahoma Assessment Area alone, we feel our loan to deposit ratio ranks us among the best. We pledge to continue to improve. This is reflected in the most recent CRA Examination Public Disclosure.

Exhibit "A" Western Assessment Area January 2024



2023 Census Tracts in Assessment Areas- Whole Counties

Western OK Area	MSA CODE	STATE CODE	STATE	COUNTY CODE	COUNTY	INCOME	UNDERSERVED/DISTRESSED
9508.00	NA	40	OK	39	CUSTER	Middle	No
9604.01	NA	40	OK	39	CUSTER	Upper	No
9604.02	NA	40	OK	39	CUSTER	Upper	No
9606.00	NA	40	OK	39	CUSTER	Moderate	No
9607.01	NA	40	OK	39	CUSTER	Upper	No
9607.02	NA	40	OK	39	CUSTER	Upper	No
9610.00	NA	40	OK	39	CUSTER	Middle	No
9591.00	NA	40	OK	43	DEWEY	Middle	Yes*
9592.00	NA	40	OK	43	DEWEY	Middle	Yes*
9593.00	NA	40	OK	43	DEWEY	Middle	Yes*
9600.00	NA	40	OK	129	ROGER MILLS	Middle	Yes*
9649.00	NA	40	OK	149	WASHITA	Middle	No
9650.00	NA	40	OK	149	WASHITA	Upper	No
9651.00	NA	40	OK	149	WASHITA	Middle	No
9654.00	NA	40	OK	149	WASHITA	Middle	No

1014.00	36420	40	OK	109	OKLAHOMA	Unknown	No
1015.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1018.00	36420	40	OK	109	OKLAHOMA	Upper	No
1019.00	36420	40	OK	109	OKLAHOMA	Upper	No
1020.00	36420	40	OK	109	OKLAHOMA	Middle	No
1021.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1022.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1023.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1024.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1025.00	36420	40	OK	109	OKLAHOMA	Upper	No
1032.00	36420	40	OK	109	OKLAHOMA	Upper	No
1033.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1039.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1041.00	36420	40	OK	109	OKLAHOMA	Low	No
1042.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1043.00	36420	40	OK	109	OKLAHOMA	Low	No
1044.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1045.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1046.00	36420	40	OK	109	OKLAHOMA	Low	No
1047.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1048.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1049.00	36420	40	OK	109	OKLAHOMA	Low	No
1050.00	36420	40	OK	109	OKLAHOMA	Unknown	No
1051.01	36420	40	OK	109	OKLAHOMA	Middle	No
1052.01	36420	40	OK	109	OKLAHOMA	Low	No
1052.02	36420	40	OK	109	OKLAHOMA	Low	No
1053.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1054.00	36420	40	OK	109	OKLAHOMA	Low	No
1055.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1056.00	36420	40	OK	109	OKLAHOMA	Low	No
1059.03	36420	40	OK	109	OKLAHOMA	Moderate	No
1059.04	36420	40	OK	109	OKLAHOMA	Moderate	No
1059.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1059.06	36420	40	OK	109	OKLAHOMA	Moderate	No
1059.07	36420	40	OK	109	OKLAHOMA	Low	No
1060.00	36420	40	OK	109	OKLAHOMA	Middle	No
1061.00	36420	40	OK	109	OKLAHOMA	Middle	No
1062.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1063.01	36420	40	OK	109	OKLAHOMA	Low	No
1063.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1063.03	36420	40	OK	109	OKLAHOMA	Middle	No
1064.01	36420	40	OK	109	OKLAHOMA	Upper	No
1064.02	36420	40	OK	109	OKLAHOMA	Upper	No
1064.03	36420	40	OK	109	OKLAHOMA	Moderate	No

1065.01	36420	40	OK	109	OKLAHOMA	Upper	No
1065.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1065.03	36420	40	OK	109	OKLAHOMA	Upper	No
1066.01	36420	40	OK	109	OKLAHOMA	Moderate	No
1066.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1066.06	36420	40	OK	109	OKLAHOMA	Middle	No
1066.07	36420	40	OK	109	OKLAHOMA	Moderate	No
1066.08	36420	40	OK	109	OKLAHOMA	Middle	No
1066.09	36420	40	OK	109	OKLAHOMA	Middle	No
1066.10	36420	40	OK	109	OKLAHOMA	Unknown	No
1066.11	36420	40	OK	109	OKLAHOMA	Moderate	No
1067.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1067.04	36420	40	OK	109	OKLAHOMA	Middle	No
1067.05	36420	40	OK	109	OKLAHOMA	Middle	No
1067.06	36420	40	OK	109	OKLAHOMA	Unknown	No
1067.08	36420	40	OK	109	OKLAHOMA	Upper	No
1067.09	36420	40	OK	109	OKLAHOMA	Moderate	No
1067.10	36420	40	OK	109	OKLAHOMA	Moderate	No
1068.01	36420	40	OK	109	OKLAHOMA	Moderate	No
1068.02	36420	40	OK	109	OKLAHOMA	Middle	No
1068.03	36420	40	OK	109	OKLAHOMA	Moderate	No
1068.04	36420	40	OK	109	OKLAHOMA	Moderate	No
1069.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1069.03	36420	40	OK	109	OKLAHOMA	Middle	No
1069.06	36420	40	OK	109	OKLAHOMA	Middle	No
1069.07	36420	40	OK	109	OKLAHOMA	Middle	No
1069.09	36420	40	OK	109	OKLAHOMA	Middle	No
1069.10	36420	40	OK	109	OKLAHOMA	Moderate	No
1069.11	36420	40	OK	109	OKLAHOMA	Middle	No
1069.12	36420	40	OK	109	OKLAHOMA	Low	No
1069.13	36420	40	OK	109	OKLAHOMA	Moderate	No
1069.14	36420	40	OK	109	OKLAHOMA	Middle	No
1069.16	36420	40	OK	109	OKLAHOMA	Moderate	No
1069.17	36420	40	OK	109	OKLAHOMA	Low	No
1070.01	36420	40	OK	109	OKLAHOMA	Moderate	No
1070.02	36420	40	OK	109	OKLAHOMA	Moderate	No
1071.01	36420	40	OK	109	OKLAHOMA	Unknown	No
1071.03	36420	40	OK	109	OKLAHOMA	Moderate	No
1071.04	36420	40	OK	109	OKLAHOMA	Low	No
1072.06	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.07	36420	40	OK	109	OKLAHOMA	Middle	No
1072.12	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.13	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.14	36420	40	OK	109	OKLAHOMA	Middle	No

1072.15	36420	40	OK	109	OKLAHOMA	Low	No
1072.16	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.17	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.18	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.19	36420	40	OK	109	OKLAHOMA	Moderate	No
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1072.21	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.22	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.23	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.24	36420	40	OK	109	OKLAHOMA	Middle	No
1072.25	36420	40	OK	109	OKLAHOMA	Moderate	No
1072.26	36420	40	OK	109	OKLAHOMA	Moderate	No
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1073.03	36420	40	OK	109	OKLAHOMA	Moderate	No
1073.05	36420	40	OK	109	OKLAHOMA	Unknown	No
1073.06	36420	40	OK	109	OKLAHOMA	Low	No
1074.01	36420	40	OK	109	OKLAHOMA	Middle	No
1074.04	36420	40	OK	109	OKLAHOMA	Middle	No
1074.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1074.06	36420	40	OK	109	OKLAHOMA	Middle	No
1074.07	36420	40	OK	109	OKLAHOMA	Middle	No
1076.01	36420	40	OK	109	OKLAHOMA	Moderate	No
1076.04	36420	40	OK	109	OKLAHOMA	Moderate	No
1076.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1076.08	36420	40	OK	109	OKLAHOMA	Middle	No
1077.03	36420	40	OK	109	OKLAHOMA	Middle	No
1077.04	36420	40	OK	109	OKLAHOMA	Moderate	No
1077.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1077.06	36420	40	OK	109	OKLAHOMA	Moderate	No
1077.07	36420	40	OK	109	OKLAHOMA	Moderate	No
1078.01	36420	40	OK	109	OKLAHOMA	Middle	No
1078.04	36420	40	OK	109	OKLAHOMA	Moderate	No
1078.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1078.06	36420	40	OK	109	OKLAHOMA	Moderate	No
1078.07	36420	40	OK	109	OKLAHOMA	Moderate	No
1078.08	36420	40	OK	109	OKLAHOMA	Middle	No
1078.09	36420	40	OK	109	OKLAHOMA	Middle	No
1078.10	36420	40	OK	109	OKLAHOMA	Moderate	No
1079.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1080.03	36420	40	OK	109	OKLAHOMA	Low	No
1080.05	36420	40	OK	109	OKLAHOMA	Middle	No
1080.06	36420	40	OK	109	OKLAHOMA	Middle	No
1080.07	36420	40	OK	109	OKLAHOMA	Middle	No
1080.08	36420	40	OK	109	OKLAHOMA	Moderate	No

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1081.06	36420	40	OK	109	OKLAHOMA	Upper	No
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1081.13	36420	40	OK	109	OKLAHOMA	Upper	No
1081.14	36420	40	OK	109	OKLAHOMA	Upper	No
1082.01	36420	40	OK	109	OKLAHOMA	Middle	No
1082.03	36420	40	OK	109	OKLAHOMA	Moderate	No
1082.04	36420	40	OK	109	OKLAHOMA	Middle	No
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1082.28	36420	40	OK	109	OKLAHOMA	Upper	No
1082.29	36420	40	OK	109	OKLAHOMA	Upper	No
1082.30	36420	40	OK	109	OKLAHOMA	Middle	No
1082.31	36420	40	OK	109	OKLAHOMA	Upper	No
1082.32	36420	40	OK	109	OKLAHOMA	Upper	No
1082.33	36420	40	OK	109	OKLAHOMA	Upper	No
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1083.04	36420	40	OK	109	OKLAHOMA	Middle	No
1083.07	36420	40	OK	109	OKLAHOMA	Middle	No
1083.09	36420	40	OK	109	OKLAHOMA	Low	No
1083.10	36420	40	OK	109	OKLAHOMA	Moderate	No
1083.14	36420	40	OK	109	OKLAHOMA	Moderate	No
1083.17	36420	40	OK	109	OKLAHOMA	Upper	No
1083.18	36420	40	OK	109	OKLAHOMA	Upper	No

1083.19	36420	40	OK	109	OKLAHOMA	Middle	No
1083.20	36420	40	OK	109	OKLAHOMA	Middle	No
1083.21	36420	40	OK	109	OKLAHOMA	Moderate	No
1083.22	36420	40	OK	109	OKLAHOMA	Moderate	No
1083.23	36420	40	OK	109	OKLAHOMA	Upper	No
1083.24	36420	40	OK	109	OKLAHOMA	Upper	No
1083.25	36420	40	OK	109	OKLAHOMA	Upper	No
1083.26	36420	40	OK	109	OKLAHOMA	Moderate	No
1084.02	36420	40	OK	109	OKLAHOMA	Middle	No
1084.03	36420	40	OK	109	OKLAHOMA	Middle	No
1084.04	36420	40	OK	109	OKLAHOMA	Middle	No
1085.06	36420	40	OK	109	OKLAHOMA	Middle	No
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1085.20	36420	40	OK	109	OKLAHOMA	Upper	No
1085.21	36420	40	OK	109	OKLAHOMA	Middle	No
1085.23	36420	40	OK	109	OKLAHOMA	Upper	No
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1085.26	36420	40	OK	109	OKLAHOMA	Middle	No
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1085.37	36420	40	OK	109	OKLAHOMA	Upper	No
1085.38	36420	40	OK	109	OKLAHOMA	Upper	No
1086.03	36420	40	OK	109	OKLAHOMA	Upper	No
1086.04	36420	40	OK	109	OKLAHOMA	Middle	No
1087.01	36420	40	OK	109	OKLAHOMA	Upper	No
1087.06	36420	40	OK	109	OKLAHOMA	Middle	No
1087.07	36420	40	OK	109	OKLAHOMA	Middle	No
1087.08	36420	40	OK	109	OKLAHOMA	Middle	No
1087.09	36420	40	OK	109	OKLAHOMA	Upper	No
1087.10	36420	40	OK	109	OKLAHOMA	Upper	No
1087.11	36420	40	OK	109	OKLAHOMA	Upper	No

1087.12	36420	40	OK	109	OKLAHOMA	Upper	No
1087.13	36420	40	OK	109	OKLAHOMA	Upper	No
1088.02	36420	40	OK	109	OKLAHOMA	Middle	No
1088.03	36420	40	OK	109	OKLAHOMA	Low	No
1088.04	36420	40	OK	109	OKLAHOMA	Middle	No
1088.05	36420	40	OK	109	OKLAHOMA	Moderate	No
1088.06	36420	40	OK	109	OKLAHOMA	Upper	No
1088.07	36420	40	OK	109	OKLAHOMA	Upper	No
1089.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1090.01	36420	40	OK	109	OKLAHOMA	Middle	No
1090.03	36420	40	OK	109	OKLAHOMA	Middle	No
1090.04	36420	40	OK	109	OKLAHOMA	Upper	No
1092.02	36420	40	OK	109	OKLAHOMA	Middle	No
1092.03	36420	40	OK	109	OKLAHOMA	Upper	No
1092.04	36420	40	OK	109	OKLAHOMA	Upper	No
1092.05	36420	40	OK	109	OKLAHOMA	Upper	No
1093.00	36420	40	OK	109	OKLAHOMA	Middle	No
1094.00	36420	40	OK	109	OKLAHOMA	Upper	No
1095.00	36420	40	OK	109	OKLAHOMA	Low	No
1096.00	36420	40	OK	109	OKLAHOMA	Unknown	No
1097.00	36420	40	OK	109	OKLAHOMA	Upper	No
1098.00	36420	40	OK	109	OKLAHOMA	Moderate	No
1099.00	36420	40	OK	109	OKLAHOMA	Middle	No
1100.00	36420	40	OK	109	OKLAHOMA	Low	No
9800.01	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.02	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.03	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.04	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.05	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.06	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.07	36420	40	OK	109	OKLAHOMA	Upper	No
9800.08	36420	40	OK	109	OKLAHOMA	Unknown	No
9800.09	36420	40	OK	109	OKLAHOMA	Unknown	No

COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC 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 FDIC; and comments received from the public relating to our performance in helping to meet community needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Manager, Division of Supervision and Consumer Protection, FDIC:

**Federal Deposit Insurance Corporation
Dallas Regional Office
1601 Bryan St.
Dallas, TX 75201**

You may send written comments about our performance in helping to meet community credit needs to:

**Matt Jackson
The Bank of The West
P. O. Box 160
Thomas, OK 73669**

and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Manager. You may also request from the FDIC Regional Manager an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of **BancWest, Inc.**, a bank holding company. You may request from the President, Federal Reserve Bank of Kansas City, 925 Grand Boulevard, Kansas City, MO 64198-0001 an announcement of applications covered by CRA filed by bank holding companies.

Exhibit "D"

COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC 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. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in the assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Manager, Division of Supervision and Consumer Protection, FDIC:

**Federal Deposit Insurance Corporation
Dallas Regional Office
1601 Bryan St.
Dallas, TX 75201**

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**Matt Jackson
The Bank of The West
P. O. Box 160
Thomas, OK 73669**

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You may ask to look at any comments received by the FDIC Regional Manager. You may also request from the FDIC Regional Manager an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of **BancWest, Inc.**, a bank holding company. You may request from the President, Federal Reserve Bank of Kansas City, 925 Grand Boulevard, Kansas City, MO 64198-0001, an announcement of applications covered by CRA filed by bank holding companies.

Exhibit "E"**The Bank of The West, Thomas Oklahoma****Fee Schedule****(See Truth-in-Savings and Common Features Account Disclosures for exact terms of fees.)****Product or Service****Summary of Applicable Fee or Service Charge that may be imposed**

Consumer Checking Account	No monthly maintenance or per debit charges.
Super NOW Interest Bearing Checking Account	No monthly maintenance or per debit charges. Minimum balance of \$1,500 required to earn interest.
MMDA Account	No monthly maintenance charges. Minimum balance of \$1,500 required to earn interest. \$5.00 charge for each withdrawal in excess of account limitations
Commercial Checking Account	\$5.00 per month maintenance Fee. \$0.15 per debit fee. \$0.06 per item not drawn on this bank. 0.015% Earnings Credit
Savings Account	No monthly maintenance charges. \$5.00 charge for each withdrawal in excess of account limitations
Certificates of Deposit	Early withdrawal penalties apply, up to three month's worth of interest on the amount withdrawn
Check Printing Fee	Varies based on quantity and style of checks ordered
Certified Check Fee	\$3.00 each
Check Cashing Fee for Non-Customers	1.5% of check amount with a \$5.00 minimum. Check cashing for non-customers subject to approval
Dormant Account Fee	\$5.00 per month
Garnishment and Levy Servicing Fee	\$25.00 each
Overdraft Account Fee	18% per anum interest charged for each business day the account is overdrawn. Charged to account monthly
Non-Sufficient Funds (NSF) Fee	\$20.00 per each NSF Check or Draft, whether paid or returned.
Account Activiy Cutoff	\$2.00
Special Statement Cutoff	\$2.00
Statement Reprint	\$2.00 each
Statement Reprint with check images	\$7.50 each
Account Research or Balancing Assistance	\$21.00 per hour with a one hour minimum
Stop Payment Fee	\$20.00 each
Photocopies	\$0.25 each
Notary Fees	Customer: \$1.00 Non-Customer: \$5.00 (no fee for absentee ballots)
Amortization Schedule Generation	\$10.00
Outgoing Collections	\$15.00
Fax Services	Customer: \$1.00 first page / \$0.25 each additional page. Non-Customer: \$3.00 first page / \$0.25 each additional page
Safe Deposit Box Lost Key Charge	\$40.00
Safe Deposit Box Drilled Box Charge	\$100.00
Wire Fee: Domestic	Incoming: \$10.00 Outgoing: \$20.00
Wire Fee: International	Incoming: \$25.00 Outgoing: \$45.00
Debit Card Replacement Fee	\$25.00
Debit Card PIN Mailer	\$5.00

PUBLIC DISCLOSURE

February 16, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bank of the West
Certificate Number: 25703

101 South Main Street
Thomas, Oklahoma 73669

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

1601 Bryan Street, Suite 1410
Dallas, Texas 75201

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

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

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

The Bank of the West's satisfactory Lending Test performance supports the overall Community Reinvestment Act (CRA) rating. The following points summarize the bank's Lending Test performance.

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

DESCRIPTION OF INSTITUTION

The Bank of the West, founded in 1984, is a retail commercial bank headquartered in Thomas, Oklahoma. Bancwest, Inc., Thomas, Oklahoma, a one-bank holding company, wholly owns the institution. Bank subsidiaries include Bancwest Capital, LLC and Bancwest Financial, LLC. The Bank of the West received a Satisfactory rating at its previous Federal Deposit Insurance Corporation (FDIC) Performance Evaluation, dated March 9, 2015, based on Interagency Small Institution Examination Procedures.

The Bank of the West operates four full-service offices throughout its combined AAs, within the State of Oklahoma. The main office, located in a middle-income census tract in western Oklahoma, sits approximately 74 miles west of Oklahoma City. The Bank of the West also operates from three additional branch offices located in Clinton, Leedey, and Oklahoma City.

The bank offers loan products including commercial, agricultural, residential, and consumer loans, primarily focusing on commercial and agricultural lending. The Bank of the West also offers a variety of deposit services including checking and savings accounts, certificates of deposit, and individual retirement accounts. Alternative banking services include online and mobile banking, electronic bill pay, and bank-owned automated teller machines at three of the bank's four offices.

The bank did not open or close any offices since the previous evaluation, nor did the bank experience any merger or acquisition activity.

As of December 31, 2020, the bank’s assets totaled approximately \$154.3 million and included net loans and leases of \$129.1 million. The bank reported total deposits of \$133.8 million as of the same date. Since the previous CRA performance evaluation, the bank’s total assets increased by 11.8 percent, net loans increased by 3.2 percent, and total deposits increased by 10.0 percent.

As shown in the following table, the loans outstanding as of December 31, 2020, reflect a distribution generally consistent with that of the loans originated and purchased during 2020, as discussed under the Scope of Evaluation. Commercial loans (Secured by Nonfarm Nonresidential Properties and Commercial and Industrial Loans) at 42.1 percent by dollar volume followed by agricultural loans (Secured by Farmland and Agricultural Production and Other Loans to Farmers) at 23.1 percent represent two of the largest loan categories by dollar volume.

Loan Portfolio Distribution as of 12/31/2020		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	37,175	28.4
Secured by Farmland	11,099	8.5
Secured by 1-4 Family Residential Properties	7,994	6.1
Secured by Multifamily (5 or more) Residential Properties	0	0.0
Secured by Nonfarm Nonresidential Properties	35,256	26.8
Total Real Estate Loans	91,524	69.8
Commercial and Industrial Loans	19,921	15.2
Agricultural Production and Other Loans to Farmers	19,106	14.6
Consumer Loans	515	0.4
Obligations of States and Political Subdivisions in the U.S.	7	<0.1
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	131,073	100.0
<i>Source: Reports of Condition and Income</i>		

Based on the information discussed in this section, as well as other regulatory data, The Bank of the West’s financial condition, size, product offerings, prior performance, and lack of legal impediments did not affect the institution’s ability to meet its AAs’ credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. The Bank of the West designated two contiguous AAs as seen in the table below: 1) Oklahoma Metropolitan Statistical Area (MSA) AA and 2) Oklahoma Non-MSA AA. These combined AAs contain 25 census tracts with the following income designations based on 2015 American Community Survey (ACS) Census data: 2 moderate-income tracts, 6 middle-income tracts, and 17 upper-income tracts. No branches operate in moderate-income

geographies. The combined AAs meet the requirements of the CRA regulations. Examiners provide a more detailed discussion of each AA, including economic and demographic data as well as competition, in the AA sections of this evaluation.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of CTs	# of Branches
Oklahoma MSA AA	Oklahoma and Logan Counties, Oklahoma	15	1 Full-Service Office
Oklahoma Non-MSA AA	Custer, Dewey, Roger Mills, and Washita Counties, Oklahoma	10	3 Full-Service Offices
<i>Source: Bank Data</i>			

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated March 9, 2015, to the current evaluation dated February 16, 2021. Examiners used the Interagency Small Institution Examination Procedures to evaluate The Bank of the West’s CRA performance. These procedures include the CRA Small Bank Lending Test. See the appendices for a description of the CRA Small Bank performance criteria.

As noted previously, the bank operates in two contiguous AAs in Oklahoma. The following table shows that the bank maintains a majority of the bank’s loans by dollar volume in the Oklahoma MSA AA. However, the Oklahoma Non-MSA AA accounts for a majority of the bank’s loans by number volume and substantial majorities of the bank’s deposits and branches. Consequently, examiners applied full-scope procedures to both AAs and weighed performance in the Oklahoma MSA AA slightly more heavily when reaching conclusions. Examiners noted that the significant amount of construction and land development as well as commercial lending in the Oklahoma MSA AA attributed to the significant dollar volume of loans in such AA.

Assessment Area Breakdown of Loans, Deposits, and Branches								
Assessment Area	Loans				Deposits		Branches	
	\$(000s)	%	#	%	\$(000s)	%	#	%
Oklahoma MSA AA	90,087	65.4	146	36.4	4,596	3.6	1	25.0
Oklahoma Non-MSA AA	47,557	34.6	255	63.6	124,467	96.4	3	75.0
Total	137,644	100.0	401	100.0	129,063	100.0	4	100.0
<i>Source: 2020 Bank Data; FDIC Deposit Market Share Report 06/30/2020</i>								

Activities Reviewed

Examiners determined that the bank’s major product lines include small business and small farm lending. This conclusion considered the bank’s business strategy, loan portfolio distribution, and the number and dollar volume of loans originated during the evaluation period. No other typically reviewed loan types, such as home mortgage or consumer loans, represent a major product line. Therefore, examiners did not analyze these lending products, as they would not provide material support for conclusions or the rating. Bank records indicated that the lending

focus and product mix remained consistent throughout the evaluation period. The following table shows the bank's originations and purchases over the most recent full calendar year by loan type.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	45,715	33.2	74	18.5
Secured by Farmland	8,437	6.1	15	3.7
Secured by 1-4 Family Residential Properties	7,398	5.4	31	7.7
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	15,843	11.5	23	5.8
Commercial and Industrial Loans	27,532	20.0	110	27.4
Agricultural Loans	32,490	23.6	120	29.9
Consumer Loans	229	0.2	28	7.0
Other Loans	0	0.0	0	0.0
Total Loans	137,644	100.0	401	100.0
<i>Source: 2020 Bank Data</i>				

This evaluation considers small business and small farm loans the bank originated from January 1, 2020, through December 31, 2020. From the 133 commercial loans originated in 2020, examiners determined 123 loans totaling \$20,652,318 were classified as small business loans. Examiners considered an initial sample of 97 small business loans totaling \$13,938,678. Due to limited small business lending identified in the Oklahoma MSA AA, examiners also considered the remaining 8 small business loans in the Oklahoma MSA AA originated in 2020 totaling \$4,257,490 in the applicable borrow profile analysis. Examiners deemed the samples representative of the bank's small business lending performance during the entire evaluation period. D&B demographic data for 2020 provided the standard of comparison for the sampled small business loans.

From the 135 agricultural loans originated in 2020, examiners determined 110 loans totaling \$9,262,443 were classified as small farm loans. Examiners considered a sample of 47 small farm loans totaling \$4,116,233. Examiners deemed the sample representative of the bank's small farm lending performance during the entire evaluation period. The bank originated only one of its 2020 small farm loans in the Oklahoma MSA AA. Further, the Oklahoma Non-MSA AA accounted for 84.1 percent of the dollar volume of the agricultural loans. Consequently, examiners did not review small farm lending in the Oklahoma MSA AA. D&B demographic data for 2020 provided the standard of comparison for the sampled small farm loans.

Examiners reviewed the number and dollar volume of small business and small farm loans. While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans because the number of loans is a better indicator of the number of businesses and farms served.

As reflected in the following table, examiners considered the universes by both number and dollar volume of loans originated in 2020, as well as management's stated business strategy to determine the weighting applied to the loan categories reviewed. Therefore, small business loans received heavier weighting when reaching conclusions.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Business	123	20,652	105	18,196
Small Farm	110	9,262	47	4,116

Source: 2020 Bank Data

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The Bank of the West demonstrated a satisfactory record regarding the Lending Test. The bank exhibited a more than reasonable record regarding its LTD ratio and originated a majority of the loans reviewed within its AAs. In addition, the bank exhibited a reasonable geographic distribution performance and an excellent borrower profile performance.

Loan-to-Deposit Ratio

The LTD ratio is more than 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 Report of Income and Condition data, averaged 103.5 percent over the past 24 calendar quarters from March 31, 2015, to December 31, 2020, representing an increase from the 95.8 percent average, net LTD ratio at the prior evaluation. The ratio ranged from a low of 96.5 percent as of December 31, 2020, to a high of 113.0 percent as of September 30, 2017, with no discernable trend.

Examiners identified and listed in the following table three comparable institutions operating in similar areas and reflecting generally comparable asset sizes and lending emphases. The Bank of the West's ratio rises clearly above all three comparable institutions' ratios.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 12/31/2020 (\$000s)	Average Net LTD Ratio (%)
The Bank of the West, Thomas, OK	\$154,273	103.5
Security State Bank, Cheyenne, OK	\$235,993	70.7
Oklahoma Bank and Trust Company, Clinton, OK	\$176,253	52.8
Southwest Bank of Weatherford, Weatherford, OK	\$73,230	61.1

Source: Reports of Condition and Income 03/31/2015 – 12/31/2020

Assessment Area Concentration

A majority of loans and other lending-related activities are in the institution's AAs. Majorities of small business and small farm loans originated inside the bank's AAs support this conclusion. Examiners considered the bank's asset size and office structure, as well as the loan products

reviewed relative to the AAs’ size and economy, when arriving at this conclusion. The following table illustrates that the bank originated a majority of small business and a majority of small farm lending, by number and dollar volume, inside its AAs.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	71	73.2	26	26.8	97	7,475	53.6	6,464	46.4	13,939
Small Farm	41	87.2	6	12.8	47	3,455	83.9	661	16.1	4,116

Source: 2020 Bank Data

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Reasonable lending performance in the Oklahoma Non-MSA AA supports this conclusion, as the Oklahoma MSA AA contained no low- or moderate-income geographies. Examiners considered the bank’s performance relative to available comparative data and any performance context issues. Examiners focused on the percentages by the number of loans in moderate-income geographies when arriving at conclusions and only considered those loans originated inside the bank’s AA.

Borrower Profile

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. Excellent performances in the Oklahoma MSA AA and Oklahoma Non-MSA AA support this conclusion. Examiners considered the bank’s performance relative to available comparative data and any performance context issues. Examiners focused on the percentages by number of small business and small farm loans to businesses and farms with gross annual revenues (GAR) of \$1 million or less. This performance factor only considered those loans originated inside the bank’s AAs.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

OKLAHOMA MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN OKLAHOMA MSA AA

The Oklahoma MSA AA includes 13 census tracts in Oklahoma County and 2 census tracts in contiguous Logan County, Oklahoma. The Bank of the West operates one full-service location from this AA in an upper-income tract.

Economic and Demographic Data

According to data from the 2015 ACS, the Oklahoma MSA AA includes 1 census tract in a middle-income geography and 14 tracts in upper-income geographies. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Oklahoma MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	0.0	0.0	6.7	93.3	0.0
Population by Geography	96,661	0.0	0.0	5.7	94.3	0.0
Housing Units by Geography	36,108	0.0	0.0	5.3	94.7	0.0
Owner-Occupied Units by Geography	27,967	0.0	0.0	4.9	95.1	0.0
Occupied Rental Units by Geography	5,738	0.0	0.0	8.9	91.1	0.0
Vacant Units by Geography	2,403	0.0	0.0	2.1	97.9	0.0
Businesses by Geography	13,561	0.0	0.0	3.8	96.2	0.0
Farms by Geography	438	0.0	0.0	3.4	96.6	0.0
Family Distribution by Income Level	26,493	6.8	9.5	14.2	69.5	0.0
Household Distribution by Income Level	33,705	8.9	7.5	12.4	71.1	0.0
Median Family Income Oklahoma City MSA - 36420	\$64,058	Median Housing Value Median Gross Rent Families Below Poverty Level				\$234,643 \$1,143 3.3%
<i>Source: 2015 ACS; 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2020 data from D&B, the AA includes 13,561 businesses. The analysis of small business loans under the borrower profile criterion compares the distribution of businesses by GAR level. The following provides a breakdown of the GAR for these businesses:

- 93.7 percent reported GAR of \$1 million or less,
- 2.0 percent reported GAR of more than \$1 million, and
- 4.3 percent did not report GAR information.

The service industry represents the largest portion of the businesses at 33.6 percent; followed by non-classifiable establishments at 29.8 percent; and finance, insurance, and real estate at 14.5 percent. In addition, 96.3 percent of businesses operate from a single location, and 61.1 percent have 4 or fewer employees. Major employers in the Oklahoma MSA AA include Mercy Hospital, Paycom, and The University of Central Oklahoma.

As seen in the following table, since the previous CRA evaluation, year-end unemployment rates in the Oklahoma MSA AA generally fell below state and nationwide averages. The economic outlook and unemployment levels changed significantly in April 2020, due to the national state of emergency related to the COVID-19 pandemic. Unemployment levels increased sharply at the onset of the pandemic, but declined gradually, although they remain well above levels posted in 2019.

Annual Unemployment Rates					
Area	2016	2017	2018	2019	2020
	%	%	%	%	%
Oklahoma County	4.3	4.0	3.2	3.3	5.5
Logan County	4.0	3.6	2.9	3.1	4.7
State of Oklahoma	4.7	3.9	3.3	3.4	5.3
National Average	4.7	4.1	3.9	3.6	6.7
<i>Source: Bureau of Labor Statistics</i>					

Competition

The AA reflects a high level of competition for financial services. According to the FDIC Market Share data as of June 30, 2020, 59 financial institutions operated 256 full-service offices in the area. Of these institutions, The Bank of the West ranked 56th with a 0.01 percent deposit market share.

Community Contact

Examiners utilized an existing contact to assist in identifying the credit needs of the community. The contact, a representative of a local government organization, described generally stable economic conditions with continued growth in several industries such as aerospace and e-commerce. The contact stated that the recent COVID-19 pandemic revealed that the area’s small businesses were not prepared to participate in lending arrangements with mainstream financial institutions. For example, many small businesses did not have financial data readily available needed to underwrite Paycheck Protection Program (PPP) loans. With the growth of large nationwide industries in the area, the contact identified a greater need for local financial institutions to engage with the smaller businesses. The contact stated that in addition to small business loans, financial education for small business owners is a significant need in the area.

Credit Needs

Examiners determined that home mortgage and small business loans represent the primary credit needs within the bank’s Oklahoma MSA AA. Examiners considered information from the community contact, and demographic and economic data when forming this conclusion.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA MSA AA

LENDING TEST

The bank demonstrated an outstanding record regarding the Lending Test in the Oklahoma MSA AA. The excellent borrower profile performance supports this conclusion.

Geographic Distribution

The Oklahoma MSA AA does not include any low- and moderate-income geographies, and a review of the geographic distribution criterion would not result in meaningful conclusions. Therefore, this criterion was not evaluated.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes in the Oklahoma MSA AA. The bank's excellent small business lending performance supports this conclusion.

Small Business Loans

The distribution of small business loans reflects excellent penetration among businesses of different sizes. The following table shows that the bank originated a substantial majority of its small business loans to businesses with GARs of \$1 million or less, reflective of excellent performance. This level of performance lands just 0.4 percentage points below the percent of businesses operating in the AA that report GARs of \$1 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category Oklahoma MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	71.8	1	6.7	350	5.1
\$100,000 - \$249,999	17.0	9	60.0	4,473	65.7
\$250,000 - \$499,999	3.2	4	26.6	1,739	25.5
\$500,000 - \$1,000,000	1.6	0	0.0	0	0.0
Subtotal ≤ \$1,000,000	93.7	14	93.3	6,562	96.3
> \$1,000,000	2.0	1	6.7	253	3.7
Revenue Not Available	4.3	0	0.0	0	0.0
Total	100.0	15	100.0	6,815	100.0
Source: 2020 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%					

OKLAHOMA NON-MSA AA – Full-Scope Review

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

The Oklahoma Non-MSA AA includes contiguous geographies including all five census tracts in Custer, two census tracts in Dewey, two census tract in Washita, and one census tract in Roger Mills Counties in Oklahoma. The Bank of the West operates three full-service locations in this AA, with two locations in middle-income census tracts and one location in an upper-income census tract.

Economic and Demographic Data

According to data from the 2015 ACS, the Oklahoma Non-MSA AA includes two census tracts in moderate-income geographies, five tracts in middle-income geographies, and three tracts in upper-income geographies. The AA also includes two underserved middle-income, non-metropolitan census tracts. The following table illustrates select demographic characteristics of the AA.

Demographic Information of the Assessment Area Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	20.0	50.0	30.0	0.0
Population by Geography	41,834	0.0	23.4	34.5	42.1	0.0
Housing Units by Geography	18,639	0.0	21.7	38.1	40.2	0.0
Owner-Occupied Units by Geography	9,583	0.0	14.3	41.1	44.6	0.0
Occupied Rental Units by Geography	5,581	0.0	33.9	27.2	38.9	0.0
Vacant Units by Geography	3,475	0.0	22.8	47.4	29.9	0.0
Businesses by Geography	3,425	0.0	24.0	29.2	46.8	0.0
Farms by Geography	328	0.0	10.7	59.1	30.2	0.0
Family Distribution by Income Level	10,477	18.9	15.9	19.7	45.4	0.0
Household Distribution by Income Level	15,164	21.3	13.5	17.8	47.4	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value Median Gross Rent Families Below Poverty Level			\$102,222 \$632 12.2%
<i>Source: 2015 ACS; 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2020 D&B data, the AA includes 3,425 businesses. As previously noted, the analysis of small business loans under the borrower profile criterion compares the distribution of businesses by GAR level. The following outlines the GARs for these businesses:

- 80.7 percent reported GAR of \$1 million or less,
- 5.3 percent reported GAR of more than \$1 million, and
- 14.0 percent did not report GAR information.

According to 2020 D&B data, the AA includes 328 farms. The analysis of small farm loans under the borrower profile criterion compares the distribution of farms by GAR level. The following outlines the GARs for these farms:

- 97.9 percent reported GAR of \$1 million or less,
- 1.8 percent reported GAR of more than \$1 million, and
- 0.3 percent did not report GAR information.

The service industry represents the largest portion of the businesses at 30.4 percent, followed by non-classifiable establishments at 18.4 percent, and retail trade at 11.3 percent. In addition, 86.6 percent of businesses operate from a single location, and 61.1 percent have 4 or fewer employees. Major employers in the AA include Thomas-Fay-Custer Public Schools, W&W Manufacturing, and Enable Midstream Partners.

As seen in the following table, since the previous CRA evaluation, year-end unemployment rates in the AA generally remained below the state and nationwide averages. The economic outlook and unemployment levels changed significantly in April 2020, due to the national state of emergency related to the COVID-19 pandemic. Unemployment levels increased sharply at the onset of the pandemic, but declined gradually, although they remain well above levels posted in 2019.

Annual Unemployment Rates					
Area	2016	2017	2018	2019	2020
	%	%	%	%	%
Custer County	3.8	2.4	2.4	2.8	4.6
Dewey County	3.2	2.3	1.9	2.5	4.5
Roger Mills County	4.4	2.7	2.4	3.6	4.4
Washita County	5.7	3.1	2.8	3.7	6.0
State of Oklahoma	4.7	3.9	3.3	3.4	5.3
National Average	4.7	4.1	3.9	3.6	6.7

Source: Bureau of Labor Statistics

Competition

The AA reflects a moderate level of competition for financial services. According to the FDIC Market Share data as of June 30, 2020, 26 financial institutions operated 38 full-service offices in the AA. Of these institutions, The Bank of the West ranked 4th with 7.6 percent of the deposit market share.

Community Contact

Examiners utilized an existing contact to assist in identifying the credit needs of the community. The contact, a representative of an economic development organization, noted a general decline in the economic conditions of the AA. The contact noted that the area’s economy was driven by the oil industry. The contact further stated that a slowdown in the oil industry has affected economic

drivers. The contact indicated that the area’s needs include small business and farm loans, and middle-income housing. In general, the contact stated that local financial institutions are involved in the community and are meeting the area’s credit needs.

Credit Needs

Examiners determined that consumer, small business, and small farm loans represent the primary credit needs within the bank’s Oklahoma Non-MSA AA. Examiners considered information from the community contact, and demographic and economic data when forming this conclusion.

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

LENDING TEST

The bank demonstrated a satisfactory record regarding the Lending Test in the Oklahoma Non-MSA AA. Reasonable geographic distribution performance not sufficiently lifted by excellent borrower profile performance supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Oklahoma Non-MSA AA. Reasonable small business and small farm lending performance in moderate-income census tracts supports this conclusion. The AA does not contain any low-income census tracts; therefore, examiners focused analyses on the bank’s lending in the moderate-income tracts.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. As the following table shows, the bank’s performance in moderate-income geographies falls just below, by 3.7 percentage points, the percent of businesses operating in the moderate-income areas of the AA, reflective of reasonable performance.

Geographic Distribution of Small Business Loans Oklahoma Non-MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	24.0	13	20.3	412	8.4
Middle	29.2	44	68.8	2,713	55.2
Upper	46.8	7	10.9	1,792	36.4
Total	100.0	64	100.0	4,917	100.0

*Source: 2020 D&B Data; Bank Data
Due to rounding, totals may not equal 100.0%*

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the AA. As the following table shows, the bank’s performance in moderate-income geographies exceeds, by 1.5 percentage points, the percent of farms operating in moderate-income areas, reflective of reasonable performance.

Geographic Distribution of Small Farm Loans Oklahoma Non-MSA AA					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	10.7	5	12.2	210	6.1
Middle	59.1	21	51.2	2,099	60.7
Upper	30.2	15	36.6	1,146	33.2
Totals	100.0	41	100.0	3,455	100.0
<i>Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes in the Oklahoma Non-MSA AA. The bank’s reasonable performance regarding small business loans lifted by the excellent performance regarding small farm loans supports this conclusion.

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As the following table illustrates, the bank originated more than 8 out of every 10 small business loans reviewed, or 89.1 percent, to businesses with GARs of \$1 million or less, reflective of reasonable performance. Examiners noted that 80.7 percent of businesses operating in the AA report GARs of \$1 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category Oklahoma Non-MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	48.4	23	35.9	579	11.8
\$100,000 - \$249,999	22.4	12	18.8	732	14.9
\$250,000 - \$499,999	6.9	12	18.8	587	11.9
\$500,000 - \$1,000,000	3.0	10	15.6	800	16.3
Subtotal ≤ \$1,000,000	80.7	57	89.1	2,698	54.9
> \$1,000,000	5.3	7	10.9	2,219	45.1
Revenue Not Available	14.0	0	0.0	0	0.0
Total	100.0	64	100.0	4,917	100.0
<i>Source: 2020 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

Small Farm Loans

The distribution of small farm loans reflects excellent penetration among farms of different sizes. As the following table illustrates, the bank originated all of its small farm loans within this AA to farms with GARs of \$1 million or less, reflective of excellent performance. This level of performance rises 2.1 percentage points above the percent of farms operating in the AA that report GARs of \$1 million or less.

Distribution of Small Farms Loans by Gross Annual Revenue Category Oklahoma Non-MSA AA					
Gross Revenue Level	% of Farms	#	%	\$(000s)	%
< \$100,000	60.7	28	68.3	1,625	47.0
\$100,000 - \$249,999	31.4	7	17.1	580	16.8
\$250,000 - \$499,999	4.9	5	12.2	1,025	29.7
\$500,000 - \$1,000,000	0.9	1	2.4	225	6.5
Subtotal ≤ \$1,000,000	97.9	41	100.0	3,455	100.0
> \$1,000,000	1.8	0	0.0	0	0.0
Revenue Not Available	0.3	0	0.0	0	0.0
Total	100.0	41	100.0	3,455	100.0
<i>Source: 2020 D&B Data; Bank 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 bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

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

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

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

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

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

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

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.