

**FIDELITY BANK &  
OKLAHOMA FIDELITY BANK**

**COMMUNITY REINVESTMENT  
ACT PUBLIC FILE**

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### TABLE OF CONTENTS

Community Reinvestment Act Notice

Public Written Comments

Bank Branch Locations and Hours of Operation

Alternative Delivery Channels

Automated Teller Machine Locations

Bank Branches Opened and Closed

Loan and Deposit Services

Home Mortgage Disclosure Act (HMDA) and Community Reinvestment Act (CRA)  
Disclosure Statement

Assessment Areas – Written Description

Assessment Area – Sedgwick County Kansas Map 2022

Assessment Area – Johnson County Kansas Map 2022

Assessment Area – Oklahoma County Oklahoma Map 2022

Assessment Area – Tulsa County Oklahoma Map 2022

Most Recent Performance Evaluation – Public Disclosure (10/05/2020)

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### COMMUNITY REINVESTMENT ACT PUBLIC NOTICE

Under the Federal Community Reinvestment Act (CRA), the Office of the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The OCC 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 OCC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information electronically today by selecting the link to the public file below.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of banks and savings associations that are scheduled for CRA examination in that quarter. This list is available from OCC Deputy Comptroller, Western District, Office of the Comptroller of the Currency, 1050 17th Street, Suite 1500, Denver, Colorado 80265. You may send written comments about our performance in helping to meet community credit needs to CRA Officer, Fidelity Bank, 100 E. English Street, Wichita, Kansas 67202 and OCC Deputy Comptroller, Western District, Office of the Comptroller of the Currency, 1050 17th Street, Suite 1500, Denver, Colorado 80265. Your comments, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC. We are an affiliate of Fidelity Financial Corporation, a bank holding company. You may request from the Supervision and Regulation Division, Federal Reserve Bank of Kansas, 1 Memorial Dr., Kansas City, Missouri, 64198, an announcement of applications covered by the CRA filed by bank holding companies.

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### PUBLIC WRITTEN COMMENTS

This section of the file includes all written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the Bank's performance relating to assessment area needs and opportunities, and any response to the comments by the Bank.

Fidelity Bank and Oklahoma Fidelity Bank received the following comments during the current period.

*We are grateful to Fidelity Bank for supporting our district through the adoption of Harry Street and Park elementary schools. Their generosity of time and financial resources has shown the students, staff and their families that the community cares about them. Leaders at these schools worked closely with Fidelity to identify the most meaningful ways that these resources could support student success, as well as show staff the appreciation they deserve. We already have additional Wichita companies showing interest in developing similar partnerships to support more schools in our district!*

- Dr. Alicia Thompson, Wichita Public Schools Superintendent, 2022

*The partnership between the Fidelity Family and the Harry Street community is exceptional. Our students, staff, and families benefited in extraordinary ways due to the resources, programs, and volunteerism that Fidelity provided to support and enhance our school experience.*

- Jamie Junker, Harry Street Elementary Principal – Wichita Public Schools, August 22, 2023

*Our partnership with Fidelity meant the realization of initiatives that enhance student literacy goals and promote greater social and emotional well-being. We see lots of those red shirts – at our family events, field days, the first day of school, mentoring – you are here for our WHOLE Park Elementary School community, giving our kids love, support and role models.*

- Kristi Franks, Park Elementary Principal – Wichita Public Schools, August 24, 2023

*Collaborators like Fidelity Bank make our work possible! Check out this video, see their impact! Fidelity Bank, a member institution of FHLBank Topeka since 1958, was selected as the 2022 Community Leader Award winner in recognition of their outstanding community leadership and strong financial performance. The Community Leader Award includes a \$5,000 donation to an organization of the recipient's choosing. Fidelity Bank chose to split this award between Wichita Habitat for Humanity and Mennonite Housing, non-profits Fidelity partners with as part of FHLBank Topeka's Affordable Housing Program.*

- Wichita Habitat for Humanity, September 19, 2022

*BIG thanks to Oklahoma Fidelity Bank, who is our newest Bronze Sponsor for Raise the Roof. Your sponsorship helps Revitalize T-Town continue to make homes safe and secure for low-income homeowners in Tulsa! By sponsoring Raise the Roof, you are helping Tulsans get much needed repairs, like this one! Everyone deserves a home that is safe and secure.*

- Revitalize T-Town, October 24, 2023

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

*We have even more amazing things to say thank you for! Thank you to the OKC Dodgers and Oklahoma Fidelity Bank for your generous support! We love cheering you on and are grateful for donating to us for every single home run!*

- ONE: Our Neighborhood Empowered, November 29, 2023

*The OKC Dodgers and Oklahoma Fidelity Bank recently visited our friends at ONE, Our Neighborhood Empowered, to deliver the Home Runs for Charity check! During the 2023 season, the OKC Dodgers hit 71 home runs at Chickasaw Bricktown Ballpark, so the check held a \$7,100 donation to assist ONE in positively impacting programs that enable child and adolescent development.*

- Oklahoma City Baseball Club, December 11, 2023

*Generosity is at an all time high for our school community! Our entire staff has been celebrated by Fidelity Bank and 38 Wildcats & family members have received meals, gifts, & financial support from our own employees, district staff, retired district employees, community members, Ridgepoint Church, PANDO, and Fidelity Bank.*

*My Fidelity Angel was also my Donuts with GrownUps volunteer!! Talk about building relationships and community!*

- Harry Street Elementary – Wichita Public Schools, December 13, 2023

*Words are insufficient to express our thanks and gratitude to you for your involvement in this campaign and the life of TKAAM. We believe that by immersing visitors in the Kansas African American experience, present and future generations can address current-day challenges experienced by individuals and by communities. Because of your involvement, Wichita will be home to a unique cultural and heritage asset that will serve Kansas and the nation for decades to come.*

- The Kansas African American Museum, January 22, 2024

*During the month of January, the generous employees of Fidelity Bank hosted a food drive to support the WSU Tech student food pantries. Program Manager Lauren Vardiman (left) and Program Assistant Vivian Venzor (right) delivered the much-needed items to Student Success Coach Luz Aguirre (middle). Use of the pantry is free and discrete to any WSU Tech student. On their behalf, we say a huge THANK YOU to the Fidelity Bank team! #BravelyOnward We appreciate your support more than you know!*

- WSU Tech Foundation, January 26, 2024

*Fidelity Bank just guaranteed 80 books to the homes of 80 students on day 1 of 3 of our Family Conferences! 80 books chosen individually by students from a brand new high interest selection! All kids deserve high quality literature within their home! Thank you, Fidelity Family for helping to bring equity & opportunity to kids & families.*

*I'm so thankful for this opportunity for our students and families. Thank you Fidelity Bank for supporting our school family! We are grateful!*

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

- Harry Street Elementary – Wichita Public Schools, February 7, 2024

*Survivors have something truly special to appreciate, thanks to the incredible generosity of Fidelity Bank. Their donation of custom crafted beaded bracelets is truly heartwarming. What's more, these bracelets come beautifully packaged, and the staff at Fidelity Bank went above and beyond by including a handwritten note of encouragement to accompany each bracelet. It's such a thoughtful gift that shows community support. A big thank you to Fidelity Bank for their incredible support!*

- Wichita Area Sexual Assault Center (WASAC), February 15, 2024

*Fidelity Bank shares great information on what it takes to prepare for homeownership.  
#AffordableHousing*

- Habitat for Humanity Kansas, February 26, 2024

*Another Spark en Español cohort kicked off tonight! We are so excited to meet a whole new group of entrepreneurs who have made the commitment to strengthen their companies through greater knowledge on business principles and strategies. Thank you Kansas Health Foundation, Koch Industries, Fidelity Bank, INTRUST Bank, 6 Meridian, NetWork Kansas and all of our amazing partners and sponsors for providing the resources to continue this incredible Spark experience!*

- Create Campaign, March 7, 2024

*I'd like to give a HUGE shout out to the Fidelity team for assisting at the Build My Future event this week. Thank you so much for helping team with WABA and Butler Community College on building this event into quite the learning experience for our young community members. Close to 500 high schoolers participating in this event, designed to introduce the construction industry to the students, but more importantly retain talent and individuals to Wichita. Thanks to the Fidelity team for being such a great leader and support for all.*

- Butler Community College Foundation, March 11, 2024

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### KANSAS BRANCH LOCATIONS AND HOURS OF OPERATION

| Branch Name            | Street Address                                       | Hours of Operation  | Census Tract          |
|------------------------|--|---|-----------------------|
| Downtown (Main Office) | 100 East English Street<br>Wichita, KS 67202         | Lobby: Mon.- Fri. (8:00 AM – 5:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM)                            | 0043.01<br>(Upper)    |
| East Harry             | 3525 East Harry Street<br>Wichita, KS 67218          | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0063.00<br>(Middle)   |
| South Seneca           | 3128 South Seneca Street<br>Wichita, KS 67217        | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0051.00<br>(Moderate) |
| Woodlawn               | 1306 North Woodlawn Street<br>Wichita, KS 67208      | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0073.01<br>(Upper)    |
| Twin Lakes             | 2265 North Amidon Avenue<br>Wichita, KS 67204        | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0084.00<br>(Middle)   |
| Bradley Fair           | 2111 North Bradley Fair Parkway<br>Wichita, KS 67206 | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0101.09<br>(Moderate) |
| Northwest              | 8442 West 13th Street<br>Wichita, KS 67212           | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0095.13<br>(Middle)   |
| NewMarket Square       | 2251 North Maize Road<br>Wichita, KS 67205           | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0095.15<br>(Upper)    |
| Crestview              | 12715 East Central Avenue<br>Wichita, KS 67206       | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0072.01<br>(Upper)    |
| 37th and Woodlawn      | 3641 North Woodlawn Blvd<br>Wichita, KS 67220        | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0108.02<br>(Moderate) |
| Derby                  | 2542 North Rock Road<br>Derby, KS 67037              | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 0100.07<br>(Upper)    |
| Metcalf                | 14435 Metcalf Avenue<br>Overland Park, KS 66223      | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM)                            | 0534.13<br>(Upper)    |

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### OKLAHOMA BRANCH LOCATIONS AND HOURS OF OPERATION

| Branch Name      | Street Address   | Hours of Operation  | Census Tract          |
|------------------|--|---|-----------------------|
| OFB Headquarters | 9400 North Broadway Extension<br>Oklahoma City, OK 73114 | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM)                            | 1083.01<br>(Moderate) |
| Hefner           | 2225 West Hefner Road<br>Oklahoma City, OK 73120         | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 1083.07<br>(Middle)   |
| Rockwell         | 6901 West Hefner Road<br>Oklahoma City, OK 73162         | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 1085.29<br>(Upper)    |
| 150th & Western  | 1020 Northwest 150th Street<br>Edmond, OK 73013          | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM); Sat. (9:00 AM – 12:00 PM)<br>Drive-Up: Mon.- Fri (7:30 AM – 8:00 PM); Sat. (9:00 AM – 5:00 PM) | 1083.18<br>(Upper)    |
| Utica            | 2222 South Utica Place, Suite 350<br>Tulsa, OK 74114     | Lobby: Mon.- Fri. (9:00 AM – 5:00 PM)   | 0043.01<br>(Upper)    |

### ALTERNATIVE DELIVERY CHANNELS

| Channel Name                                       | Hours of Operation  | Phone or Website   | Services Provided  |
|--|---|--|--|
| Retail Banking<br>Contact Center                   | Mon. – Fri. (7:30 AM – 8:00 PM)<br>Sat. (9:00 AM – 5:00 PM) | Kansas: (800) 658-1637<br>Oklahoma: (800) 757-0464   | Account information services; including, but not limited to, balance information, transactional information, and account to account transfers  |
| Mortgage Servicing<br>Call Center                  | Mon. – Fri. (8:00 AM – 5:00 PM)                             | (800) 304-6161   | Account information and payment services; including, but not limited to, balance information, payoff information, transactional information, and assistance requests.  |
| Smart Voice<br>Telebanking                         | 24 hours per day  | (316) 268-7333<br>(800) 616-6333   | Account information services; including, but not limited to, balance information, transactional information, and account to account transfers  |
| Online Banking                                     | 24 hours per day  | <a href="http://www.fidelitybank.com">http://www.fidelitybank.com</a><br><a href="http://www.okfidelitybank.com">http://www.okfidelitybank.com</a> | Account access service that includes, but is not limited to, balance and transactional information with the ability to transfer to from internal accounts and external accounts, and access mortgage information.  |
| Mobile Banking                                     | 24 hours per day  | Fidelity Bank Mobile App<br>OK Fidelity Mobile Banking   | Account access service that includes, but is not limited to, balance and transactional information with the ability to transfer to from internal accounts and external accounts, mobile wallet applications (Apple Pay, Samsung Pay, Android Pay), and mobile check deposit. |
| ATM/Visa Debit<br>Card with EMV<br>Chip Technology | 24 hours per day  | NA   | Account access for cash, deposit, withdrawal or internal transfer at any ATM or debit/credit transactional purchase with added EMV Chip security and contactless convenience for in-person transactions.   |



# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### AUTOMATED TELLER MACHINES – No Service Charge or Surcharge

| Location                           | Address                       | City          | State | Zip   |
|------------------------------------|-------------------------------|---------------|-------|-------|
| Fidelity Bank - Downtown*          | 100 E. English St.            | Wichita       | KS    | 67202 |
| Fidelity Bank - East Harry*        | 3525 E. Harry St.             | Wichita       | KS    | 67218 |
| Fidelity Bank - South Seneca*      | 3128 S. Seneca St.            | Wichita       | KS    | 67217 |
| Fidelity Bank - Woodlawn*          | 1306 N. Woodlawn St.          | Wichita       | KS    | 67208 |
| Fidelity Bank - Twin Lakes*        | 2265 N. Amidon Ave.           | Wichita       | KS    | 67204 |
| Fidelity Bank - Bradley Fair*      | 2111 N. Bradley Fair Pkwy     | Wichita       | KS    | 67206 |
| Fidelity Bank - Northwest*         | 8442 W. 13th St.              | Wichita       | KS    | 67212 |
| Fidelity Bank - Crestview*         | 12715 E. Central Ave.         | Wichita       | KS    | 67206 |
| Fidelity Bank - NewMarket*         | 2251 N. Maize Rd.             | Wichita       | KS    | 67205 |
| Fidelity Bank - 37th & Woodlawn*   | 3641 N. Woodlawn Blvd.        | Wichita       | KS    | 67220 |
| Fidelity Bank - Derby*             | 2542 N. Rock Rd.              | Derby         | KS    | 67037 |
| Fidelity Bank - Metcalf*           | 14435 Metcalf Ave.            | Overland Park | KS    | 66223 |
| Oklahoma Fidelity Bank - Broadway* | 9400 North Broadway Ext.      | Oklahoma City | OK    | 73114 |
| Oklahoma Fidelity Bank - Hefner*   | 2225 W. Hefner Rd.            | Oklahoma City | OK    | 73120 |
| Oklahoma Fidelity Bank - Rockwell* | 6901 W. Hefner Rd.            | Oklahoma City | OK    | 73162 |
| Oklahoma Fidelity Bank - Western*  | 1020 NW 150th St.             | Edmond        | OK    | 73013 |
| Revolustia*                        | 2721 E Central Ave., Ste. 119 | Wichita       | KS    | 67214 |

\* These ATMs also accept deposits.

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### BRANCHES OPENED

| Branch Name | Street Address | Open Date | Census Tract |
|-------------|----------------|-----------|--------------|
|             |                |           |              |

### BRANCHES CLOSED

| Branch Name  | Street Address  | Closed Date     | Census Tract          |
|--------------|---|-----------------|-----------------------|
| Tulsa        | 624 South Boston Avenue, Suite 100<br>Tulsa, OK 74119       | July 15, 2022   | 0025.00 (Middle)      |
| Westlink     | 9300 West Central Avenue<br>Wichita, KS 67212               | August 19, 2022 | 0094.01 (Middle)      |
| Edmond       | 1127 East 2nd Street<br>Edmond, OK 73034                    | April 29, 2022  | 1082.07 (Middle)      |
| Cherry Creek | 7711 East Harry Street<br>Wichita, KS 67207                 | August 19, 2022 | 0072.05 (Middle)      |
| Elliott      | 1913 South Elliott Street<br>Pryor, OK 74361                | August 18, 2023 | 0402.00<br>(Middle)   |
| Graham       | 125 East Graham Avenue<br>Pryor, OK 74361                   | August 18, 2023 | 0401.00<br>(Moderate) |
| Revolustia   | 2721 East Central<br>Avenue, Suite 119<br>Wichita, KS 67214 | July 31, 2023   | 0019.00<br>(Middle)   |

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### SERVICE AVAILABILITY

**Fidelity Bank** offers a variety of ways to deliver products and information to customers. Fidelity currently has twelve locations spread throughout Wichita, Derby and Overland Park, Kansas. Branches have lobby hours of Monday through Friday 9:00 AM to 5:00 PM and drive-up hours of 7:30 AM to 8:00 PM which accommodates many customers who need to do their banking before or after work. Many of these branches also have Saturday hours of 9:00 AM to 12:00 Noon for the lobby and all of these branches have drive-up hours of 9:00 AM to 5:00 PM. The Metcalf and Downtown Wichita locations do not have Saturday lobby hours.

**Oklahoma Fidelity Bank**, a division of Fidelity Bank, has four locations in Oklahoma City, Oklahoma and one location in Tulsa, Oklahoma. The lobby hours for these locations are Monday through Friday from 9:00 AM to 5:00 PM. Of these branches, three Oklahoma City locations maintain Saturday lobby hours from 9:00 AM to 12:00 Noon. Drive-up hours for these locations are 7:30 AM to 8:00 PM on Monday through Friday and 9:00 AM to 5:00 PM on Saturdays.

The bank's Contact Center provides toll-free connection with a live banker. Contact Center services are available Monday through Friday from 7:30 a.m. to 8:00 p.m. and Saturdays from 9:00 a.m. to 5:00 p.m.

**Interactive Banking Machines (IBM)** connect our customers via screen with a live interactive banker to assist with conducting transactions. Nearly all transactions that can be performed through a traditional drive-thru can be handled quickly and efficiently with Interactive Banking. Customers may deposit checks and cash or cash a check and receive both bills and coins, they are also able to make payments towards loans and transfer between Fidelity Bank accounts.

**Drive-Up Hours** are Monday – Friday 7:30 AM – 8:00 PM and Saturday 9:00 AM – 5:00 PM to reflect the extended hours the IBMs are available to Fidelity customers. The accessibility of these IBMs is added value for customers. Fidelity has 39 IBMs covering our assessment areas. While most IBMs are situated outside Fidelity Bank branches to serve as ATMs after hours, one IBM is located offsite at Revolutsia in Wichita.

**Other service delivery channels** allow Fidelity customers to utilize the SmartVoice telebanking system, Fidelity Bank's Online Banking system, or Mobile Banking application. The SmartVoice system provides interactive telephone service to verify account data such as balances, interest earnings and deposits. Funds can also be transferred between accounts and Fidelity loan payments can be made via telephone using the SmartVoice system.

The bank's Online Banking system provides deposit balances and account statements, balance transfers, automatic bill payments and applications for some new deposit products and some loan products. The banking services these systems provide are available 24 hours a day.

The bank's free mobile banking application, available 24 hours per day, also provides deposit balances as well as mobile check deposit and account transfers (internal and external). Additional features of the Mobile Banking application include a mobile wallet that allows payment via Apple Pay, Samsung Pay, and Android Pay at the merchant's point of sale if enabled. Customers can use their smartphone to transfer funds to other people using Zelle, or open/apply for a new account for some deposit products and some loan products. Fidelity Bank debit cards can be used surcharge-free at any Allpoint® or MoneyPass® ATM nationwide, or at any ATM or merchant that accepts Visa. Cellular service is readily available in each of Fidelity Bank's markets.

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### LOAN SERVICES

- Consumer Loans
  - Automobile
  - Home Improvement
  - Other Secured
  - Unsecured
- Personal Mortgage Loans
  - Conventional
  - Adjustable Rate
  - Government (FHA / VA / USDA)
- Lines of Credit
- Commercial and Industrial Loans
- Participations
- Small Business Administration Loan
- Marketable Securities LOC
- Real Estate Loans
  - Commercial
  - Construction
  - Equity
  - Equity Line of Credit
- Credit Cards
  - Secured Card
  - Platinum
  - Rewards
  - Commercial
  - Business
  - AP (virtual) Card

### DEPOSIT SERVICES

- Personal Checking Accounts
  - Free Checking
  - Relationship Checking
  - Legacy Checking
  - Progress Checking
- VISA Debit Cards
- Personal Overdraft Privilege
- Personal Savings Accounts
  - Statement Savings
  - High Interest Savings
  - Children's Savings
  - Health Savings Accounts
  - Personal Money Market
  - Superior Money Market
  - Relationship Money Market
- Certificates of Deposit
  - Common maturities available:
    - 12-month, 18-month, 24-month,
    - 36-month, or 60-month
- Individual Retirement Accounts
  - Traditional and Roth IRAs
  - Contributory IRA: 23-month
  - Fixed Rate Certificate of Deposit common maturities available: 12-month, 18-month, 24-month, 36-month, or 60-month
- VISA Gift Cards
- Commercial Checking Accounts
  - Free Small Business Checking
  - Commercial Analyzed Checking
  - Business Select Checking
- Commercial Savings Accounts
  - Business High Interest Savings
  - Business Money Market Max
  - Relationship Money Market
- Online Banking
  - Account Balance Information
  - Balance Alert Messages
  - Downloadable Account Information
  - Detailed Transaction Reporting
  - Internal and Intranbank Transfers
  - Bill Payment
  - Applications for some new deposit products and some loan products
  - Electronic Statements
  - Stop Payment Requests
  - Cash Order Service
  - Check Order Service
  - Account Research Service
  - Person to Person payments (Zelle)
  - Secure E-Mail to Fidelity Bank

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### DEPOSIT SERVICES

- Mobile Banking
  - Account Balance Information
  - Transaction History
  - Bill Payment
  - Applications for some new deposit products and some loan products
  - Mobile Check Deposit
  - Internal and Intranbank Transfers
  - Apple Pay, Samsung Pay, Android Pay
  - Person to Person payments (Zelle)
  - Secure Message to Fidelity Bank
- Treasury Management Services
  - Remote Deposit Service (Direct Link Merchant)
  - Positive Pay (ACH and Checks)
  - ACH Origination
  - Domestic and International Wire Transfers
  - Merchant Card Services
  - Cash and Coin Services
  - Payroll Direct Deposit
  - Electronic Federal Tax Payments
  - Electronic Data Interchange Messages
  - Information Reporting
  - Zero Balance Accounts
  - CDARS Accounts
  - ICS Sweep Accounts
  - VISA Business Debit Cards
  - Multiple User Security

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### TRANSACTION FEES

| Item   | Fee                       |
|--|---------------------------|
| Checking Monthly Service Charge                  | \$0.00-\$15.00            |
| Online Banking, Mobile Banking, and E-Statements | Free                      |
| Early Account Closing (within 90 days)           | \$30.00                   |
| Dormant Account                                  | \$10.00 monthly           |
| Overdraft Fee                                    | \$20.00                   |
| Continuous Overdraft Fee                         | \$10.00                   |
| Recurring Overdraft Fee                          | \$10.00                   |
| Return Mail                                      | \$5.00 monthly            |
| Returned Deposit                                 | \$7.50                    |
| Account Transfer for Overdraft Protection        | \$7.50 each               |
| Telephone Transfers                              | \$4.00                    |
| Stop Payment                                     | \$36.00                   |
| Cashier's Check                                  | \$5.00                    |
| Money Orders                                     | \$5.00                    |
| Bill Pay   | \$4.95 monthly            |
| ATM Withdrawals, Transfers, Inquiries            | \$2.00 (non-Fidelity ATM) |
| Replacement Card Fee                             | \$5.00                    |
| International Debit Card Purchase Fee            | 2% of transaction amount  |
| International Incoming Wires                     | \$18.00                   |
| International Outgoing Wires                     | \$45.00                   |
| Domestic Incoming Wires                          | \$12.00                   |
| Domestic Outgoing Wires                          | \$20.00                   |
| Account Reconciliation                           | \$25.00 per hour          |
| Research   | \$25.00 per hour          |
| Statement History                                | \$2.00                    |
| Signature Guarantee                              | \$5.00                    |
| Collection Items Incoming/Outgoing               | \$15.00                   |
| Garnishment                                      | \$0.00-\$15.00 by state   |
| Levy   | \$50.00                   |
| Fax Fee 1-5 pages                                | \$5.00                    |
| Fax Fee 6 or more pages                          | \$10.00                   |
| Photocopy  | \$2.00                    |
| Verification of Deposits / Credit References     | \$10.00                   |

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### HOME MORTGAGE DISCLOSURE ACT (HMDA) and COMMUNITY REINVESTMENT ACT (CRA) DISCLOSURE STATEMENTS

The Home Mortgage Disclosure Act (HMDA) data about our residential mortgage lending is available online for review. The data shows geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. Community Reinvestment Act (CRA) data about our small business lending and community development lending is also available online for review. The data shows geographic distribution of loans, income of borrowing businesses, and information about loan approvals. HMDA and CRA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)) and FFIEC websites ([https:// www.ffiec.gov/craadweb/disrptmain.aspx](https://www.ffiec.gov/craadweb/disrptmain.aspx)).

For additional documentation requests, such as the Modified Loan Application Register or Disclosure Statements, please contact Fidelity Bank Customer Care at 1.800.757.0464 or [CustomerCare@FidelityBank.com](mailto:CustomerCare@FidelityBank.com).

### MOST RECENT PERFORMANCE EVALUATION

Fidelity Bank's most recent CRA performance evaluation was completed on October 5, 2020. The public section of this evaluation may be found at the end of this document. Evaluation reports and rating information for many financial institutions can be found on website of the institution's regulator. For more information about Fidelity Bank, please visit the OCC's website (<https://www.occ.gov/publications-and-resources/tools/index-cra-search.html>).

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### FACILITY-BASED ASSESSMENT AREAS

Fidelity Bank (including Oklahoma Fidelity Bank, a division of Fidelity Bank) delineates CRA facility-based assessment areas, which the Office of the Comptroller of the Currency uses to evaluate Fidelity's record of helping to meet the credit needs of its communities. Fidelity's four assessment areas are designated by whole counties and contain all branches and remote deposit facilities of Fidelity Bank and Oklahoma Fidelity Bank.

#### **1. Sedgwick County, Kansas**

This assessment area contains eleven of Fidelity Bank's branches that are located in Wichita and Derby. Sedgwick County is coded as county #173 and is part of the Wichita Metropolitan Statistical Area (MSA #48620) which also includes the counties of Butler, Harvey and Sumner in Kansas. Wichita is the major city that is located in Sedgwick County.

#### **2. Oklahoma County, Oklahoma**

This assessment area contains four of Oklahoma Fidelity Bank's branches that are located in Oklahoma City. Oklahoma County was designated as an assessment area for Fidelity Bank as of January 13, 2004 as a result of Fidelity Bank's acquisition of Bridgeview Bank, N.A. in Oklahoma City, Oklahoma. Oklahoma County is coded as county #109 and is part of the Oklahoma City Metropolitan Statistical Area (MSA #36420) which also includes the counties of Canadian, Cleveland, Grady, Lincoln, Logan, and McClain in Oklahoma.

#### **3. Johnson County, Kansas**

This assessment area contains the Fidelity Bank branch that is located in Overland Park. Johnson County was designated as an assessment area for Fidelity Bank as of April 28, 2014 as a result of Fidelity Bank's acquisition of a branch of Bank SNB. Johnson County is coded as county #091 and is part of the Kansas City Metropolitan Statistical Area (MSA #28140). The Kansas City MSA also includes the counties of Leavenworth, Linn, Miami, and Wyandotte in Kansas and Bates, Caldwell, Cass, Clay, Clinton, Jackson, Lafayette, Platte and Ray in Missouri.

#### **4. Tulsa County, Oklahoma**

This assessment area contains one Oklahoma Fidelity Bank location in Tulsa. Tulsa County was designated as an assessment area for Fidelity Bank as of August 1, 2020. Tulsa County is coded as county #143 and is part of the Tulsa Metropolitan Statistical Area (MSA #46140). The Tulsa MSA also includes the counties of Creek, Okmulgee, Osage, Pawnee, Rogers, and Wagoner.

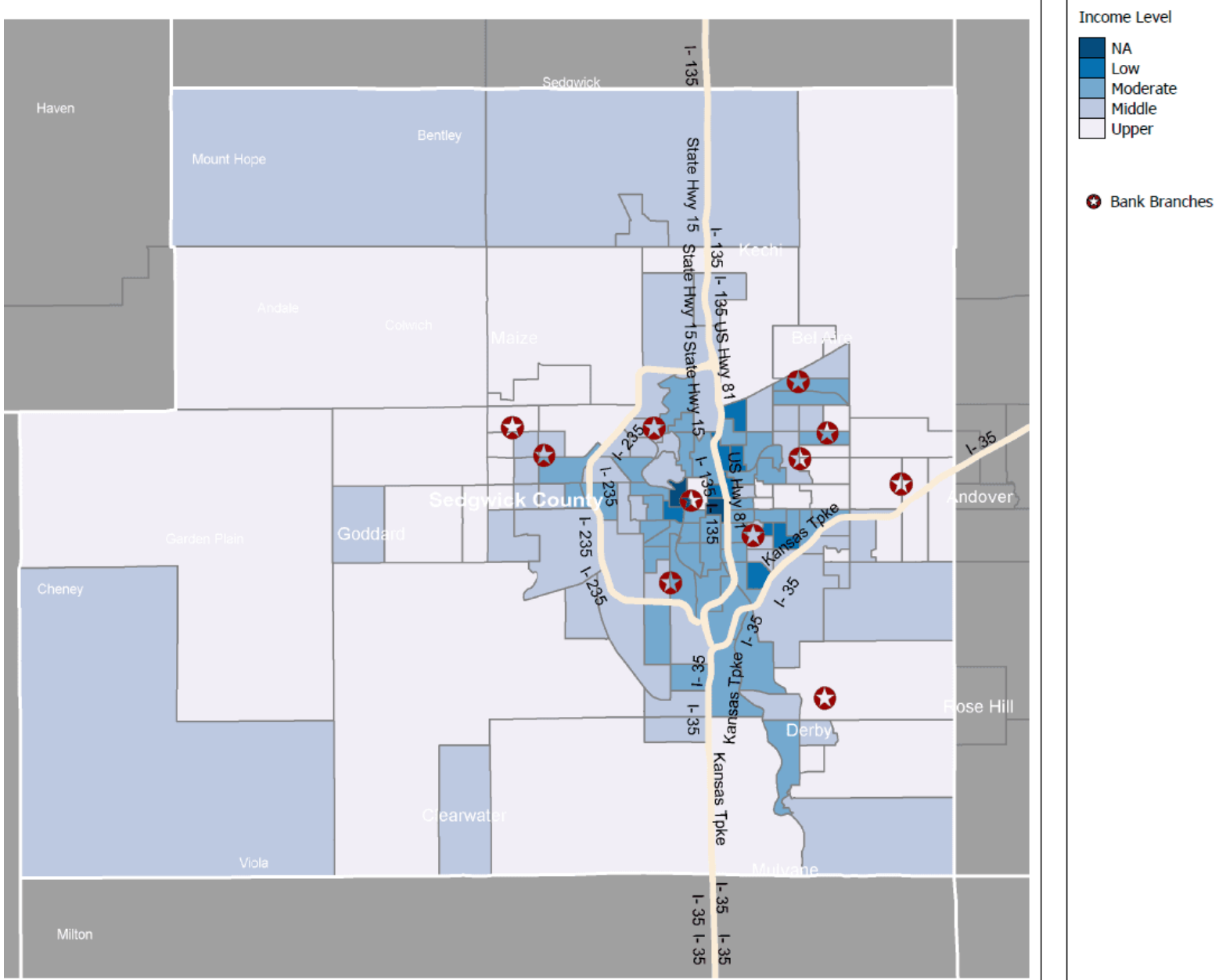
All census tracts in Sedgwick County, Kansas, Oklahoma County, Oklahoma, Johnson County, Kansas, and Tulsa County, Oklahoma are included in Fidelity Bank and Oklahoma Fidelity Bank's assessment areas.



# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

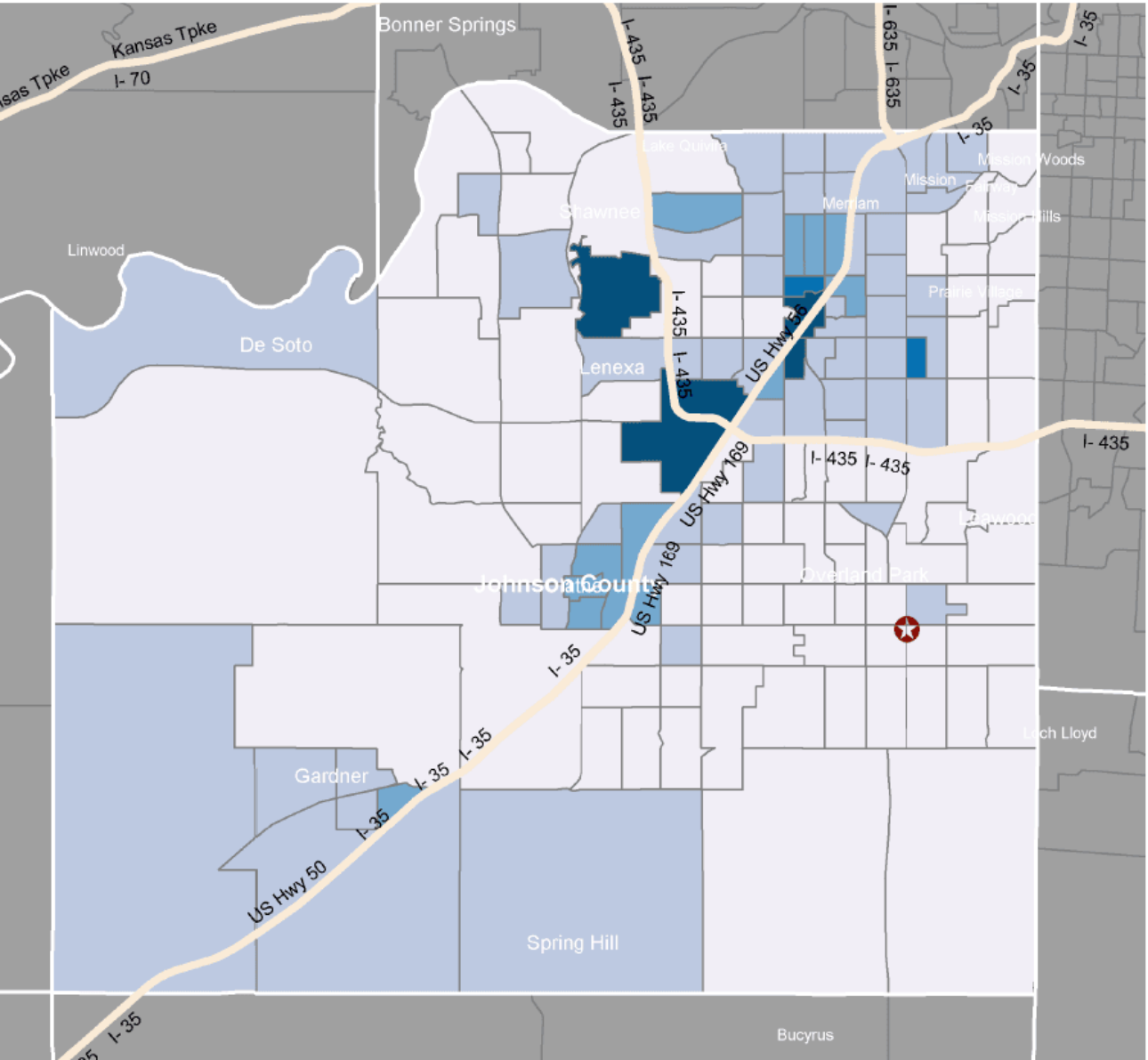
### ASSESSMENT AREAS MAPS: Sedgwick County, Kansas



# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS MAPS: Johnson County, Kansas



Income Level

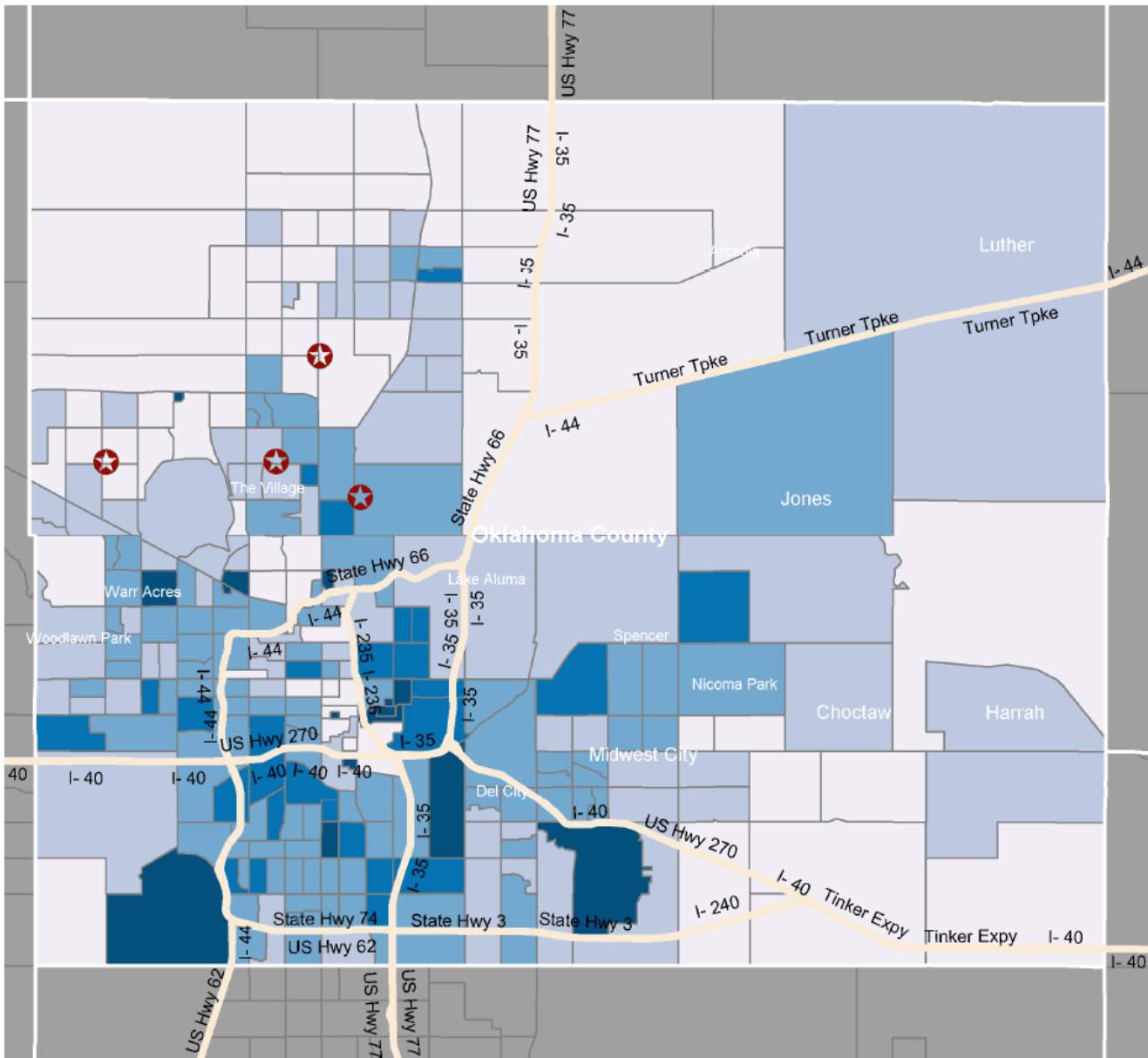
- NA
- Low
- Moderate
- Middle
- Upper

Bank Branches

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS MAPS: Oklahoma County, Oklahoma



Income Level

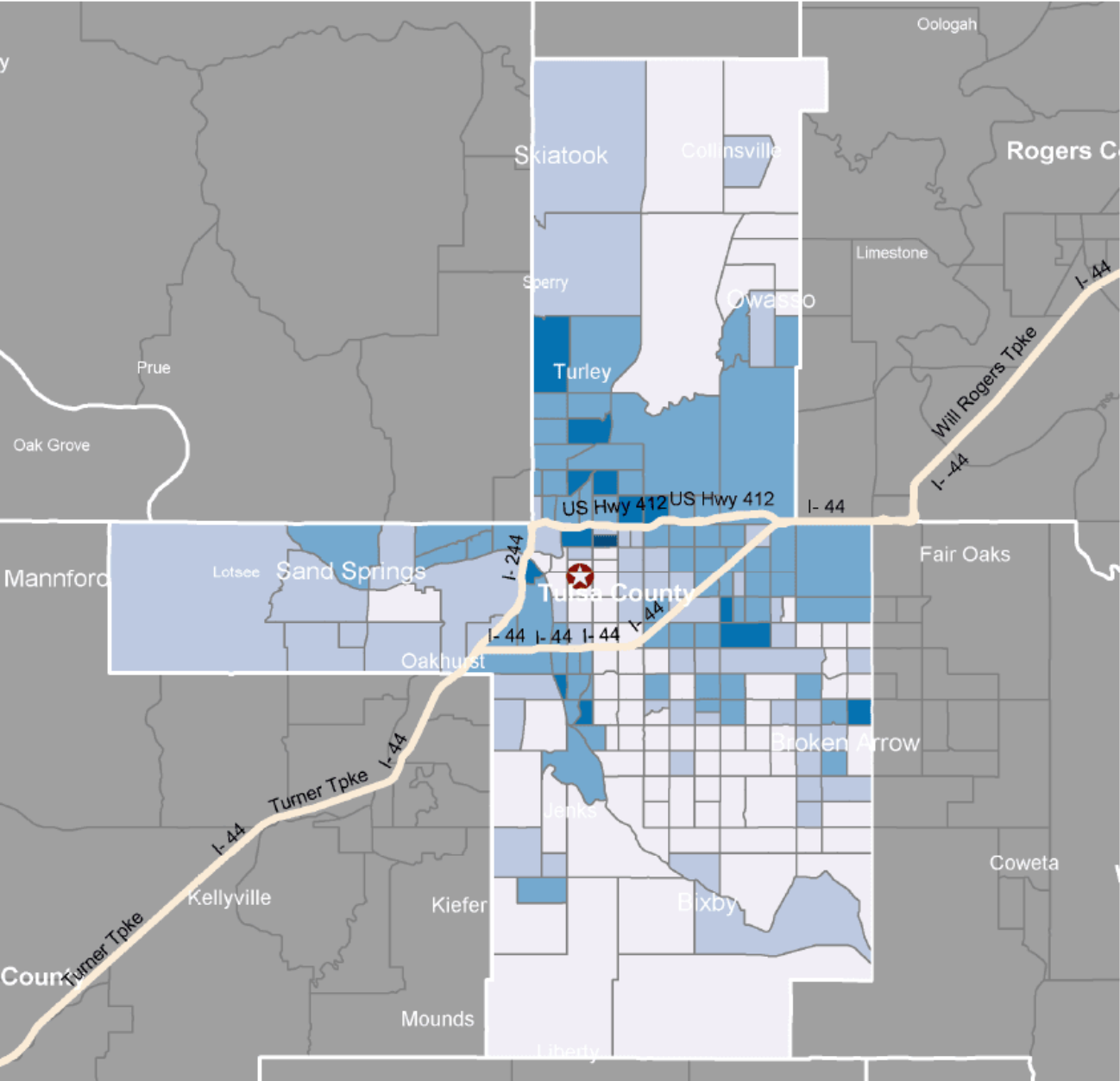
- NA
- Low
- Moderate
- Middle
- Upper

★ Bank Branches

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS MAPS: Tulsa County, Oklahoma



**Income Level**

- NA
- Low
- Moderate
- Middle
- Upper

Bank Branches

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS

Census Tract List for Sedgwick County, Kansas  
 State = 20, MSA = 48620, County = 173

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0020.00    | Upper              |
| 0022.00    | Upper              |
| 0024.00    | Unknown            |
| 0043.01    | Upper              |
| 0043.02    | Unknown            |
| 0072.01    | Upper              |
| 0072.06    | Upper              |
| 0072.07    | Upper              |
| 0073.01    | Upper              |
| 0073.02    | Upper              |
| 0095.05    | Upper              |
| 0095.06    | Upper              |
| 0095.07    | Upper              |
| 0095.09    | Upper              |
| 0095.10    | Upper              |
| 0095.12    | Upper              |
| 0095.14    | Upper              |
| 0095.15    | Upper              |
| 0096.05    | Upper              |
| 0097.00    | Upper              |
| 0098.04    | Upper              |
| 0099.01    | Upper              |
| 0100.01    | Upper              |
| 0100.02    | Upper              |
| 0100.07    | Upper              |
| 0101.08    | Upper              |
| 0101.10    | Upper              |
| 0101.11    | Upper              |
| 0101.13    | Upper              |
| 0101.15    | Upper              |
| 0101.16    | Upper              |
| 0103.01    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0103.02    | Upper              |
| 0105.00    | Upper              |
| 0106.00    | Upper              |
| 0109.00    | Upper              |
| 0001.00    | Moderate           |
| 0003.00    | Moderate           |
| 0004.00    | Moderate           |
| 0007.00    | Moderate           |
| 0009.00    | Moderate           |
| 0010.00    | Moderate           |
| 0011.00    | Moderate           |
| 0015.00    | Moderate           |
| 0023.00    | Moderate           |
| 0026.00    | Moderate           |
| 0028.00    | Moderate           |
| 0030.00    | Moderate           |
| 0031.00    | Moderate           |
| 0032.00    | Moderate           |
| 0034.00    | Moderate           |
| 0035.00    | Moderate           |
| 0036.00    | Moderate           |
| 0038.00    | Moderate           |
| 0039.00    | Moderate           |
| 0040.00    | Moderate           |
| 0051.00    | Moderate           |
| 0052.00    | Moderate           |
| 0054.02    | Moderate           |
| 0056.00    | Moderate           |
| 0058.00    | Moderate           |
| 0059.00    | Moderate           |
| 0060.00    | Moderate           |
| 0061.00    | Moderate           |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0062.00    | Moderate           |
| 0069.00    | Moderate           |
| 0070.00    | Moderate           |
| 0071.01    | Moderate           |
| 0075.00    | Moderate           |
| 0082.00    | Moderate           |
| 0087.00    | Moderate           |
| 0089.00    | Moderate           |
| 0093.01    | Moderate           |
| 0093.04    | Moderate           |
| 0098.01    | Moderate           |
| 0101.09    | Moderate           |
| 0108.01    | Moderate           |
| 0108.02    | Moderate           |
| 0002.00    | Middle             |
| 0014.00    | Middle             |
| 0019.00    | Middle             |
| 0029.00    | Middle             |
| 0053.00    | Middle             |
| 0054.01    | Middle             |
| 0055.01    | Middle             |
| 0055.02    | Middle             |
| 0057.00    | Middle             |
| 0063.00    | Middle             |
| 0064.00    | Middle             |
| 0066.00    | Middle             |
| 0067.00    | Middle             |
| 0071.02    | Middle             |
| 0072.05    | Middle             |
| 0072.08    | Middle             |
| 0076.00    | Middle             |
| 0077.01    | Middle             |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0077.02    | Middle             |
| 0080.00    | Middle             |
| 0081.00    | Middle             |
| 0083.00    | Middle             |
| 0084.00    | Middle             |
| 0085.00    | Middle             |
| 0086.00    | Middle             |
| 0088.00    | Middle             |
| 0090.00    | Middle             |
| 0091.00    | Middle             |
| 0092.00    | Middle             |
| 0093.03    | Middle             |
| 0094.01    | Middle             |
| 0094.02    | Middle             |
| 0095.04    | Middle             |
| 0095.08    | Middle             |
| 0095.11    | Middle             |
| 0095.13    | Middle             |
| 0096.03    | Middle             |
| 0096.04    | Middle             |
| 0098.03    | Middle             |
| 0099.02    | Middle             |
| 0100.03    | Middle             |
| 0100.05    | Middle             |
| 0100.06    | Middle             |
| 0101.06    | Middle             |
| 0101.07    | Middle             |
| 0102.01    | Middle             |
| 0102.02    | Middle             |
| 0104.00    | Middle             |
| 0107.00    | Middle             |
| 0006.00    | Low                |



# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS

Census Tract List for Oklahoma County, Oklahoma  
 State = 40, MSA = 36420, County = 109

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1003.00    | Upper              |
| 1009.00    | Upper              |
| 1018.00    | Upper              |
| 1019.00    | Upper              |
| 1025.00    | Upper              |
| 1032.00    | Upper              |
| 1064.01    | Upper              |
| 1064.02    | Upper              |
| 1065.01    | Upper              |
| 1065.03    | Upper              |
| 1067.08    | Upper              |
| 1081.01    | Upper              |
| 1081.06    | Upper              |
| 1081.07    | Upper              |
| 1081.09    | Upper              |
| 1081.10    | Upper              |
| 1081.13    | Upper              |
| 1081.14    | Upper              |
| 1082.22    | Upper              |
| 1082.23    | Upper              |
| 1082.24    | Upper              |
| 1082.25    | Upper              |
| 1082.27    | Upper              |
| 1082.28    | Upper              |
| 1082.29    | Upper              |
| 1082.31    | Upper              |
| 1082.32    | Upper              |
| 1082.33    | Upper              |
| 1082.34    | Upper              |
| 1082.35    | Upper              |
| 1082.37    | Upper              |
| 1083.17    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1083.18    | Upper              |
| 1083.23    | Upper              |
| 1083.24    | Upper              |
| 1083.25    | Upper              |
| 1085.07    | Upper              |
| 1085.13    | Upper              |
| 1085.20    | Upper              |
| 1085.23    | Upper              |
| 1085.28    | Upper              |
| 1085.29    | Upper              |
| 1085.30    | Upper              |
| 1085.31    | Upper              |
| 1085.32    | Upper              |
| 1085.33    | Upper              |
| 1085.34    | Upper              |
| 1085.35    | Upper              |
| 1085.36    | Upper              |
| 1085.37    | Upper              |
| 1085.38    | Upper              |
| 1086.03    | Upper              |
| 1087.01    | Upper              |
| 1087.09    | Upper              |
| 1087.10    | Upper              |
| 1087.11    | Upper              |
| 1087.12    | Upper              |
| 1087.13    | Upper              |
| 1088.06    | Upper              |
| 1088.07    | Upper              |
| 1090.04    | Upper              |
| 1092.03    | Upper              |
| 1092.04    | Upper              |
| 1092.05    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1094.00    | Upper              |
| 1097.00    | Upper              |
| 9800.07    | Upper              |
| 1001.00    | Moderate           |
| 1008.00    | Moderate           |
| 1011.00    | Moderate           |
| 1015.00    | Moderate           |
| 1021.00    | Moderate           |
| 1022.00    | Moderate           |
| 1023.00    | Moderate           |
| 1024.00    | Moderate           |
| 1033.00    | Moderate           |
| 1039.00    | Moderate           |
| 1042.00    | Moderate           |
| 1044.00    | Moderate           |
| 1045.00    | Moderate           |
| 1047.00    | Moderate           |
| 1048.00    | Moderate           |
| 1053.00    | Moderate           |
| 1055.00    | Moderate           |
| 1059.03    | Moderate           |
| 1059.04    | Moderate           |
| 1059.05    | Moderate           |
| 1059.06    | Moderate           |
| 1062.00    | Moderate           |
| 1063.02    | Moderate           |
| 1064.03    | Moderate           |
| 1065.02    | Moderate           |
| 1066.01    | Moderate           |
| 1066.02    | Moderate           |
| 1066.07    | Moderate           |
| 1066.11    | Moderate           |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1067.02    | Moderate           |
| 1067.09    | Moderate           |
| 1067.10    | Moderate           |
| 1068.01    | Moderate           |
| 1068.03    | Moderate           |
| 1068.04    | Moderate           |
| 1069.02    | Moderate           |
| 1069.10    | Moderate           |
| 1069.13    | Moderate           |
| 1069.16    | Moderate           |
| 1070.01    | Moderate           |
| 1070.02    | Moderate           |
| 1071.03    | Moderate           |
| 1072.06    | Moderate           |
| 1072.12    | Moderate           |
| 1072.13    | Moderate           |
| 1072.16    | Moderate           |
| 1072.17    | Moderate           |
| 1072.18    | Moderate           |
| 1072.19    | Moderate           |
| 1072.20    | Moderate           |
| 1072.21    | Moderate           |
| 1072.22    | Moderate           |
| 1072.23    | Moderate           |
| 1072.25    | Moderate           |
| 1072.26    | Moderate           |
| 1073.03    | Moderate           |
| 1074.05    | Moderate           |
| 1076.01    | Moderate           |
| 1076.04    | Moderate           |
| 1076.05    | Moderate           |
| 1077.04    | Moderate           |

# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

Census Tract List for Oklahoma County, Oklahoma (cont.)

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1077.05    | Moderate           |
| 1077.06    | Moderate           |
| 1077.07    | Moderate           |
| 1078.04    | Moderate           |
| 1078.05    | Moderate           |
| 1078.06    | Moderate           |
| 1078.07    | Moderate           |
| 1078.10    | Moderate           |
| 1079.00    | Moderate           |
| 1080.08    | Moderate           |
| 1080.09    | Moderate           |
| 1080.10    | Moderate           |
| 1080.11    | Moderate           |
| 1082.03    | Moderate           |
| 1082.08    | Moderate           |
| 1083.01    | Moderate           |
| 1083.10    | Moderate           |
| 1083.14    | Moderate           |
| 1083.21    | Moderate           |
| 1083.22    | Moderate           |
| 1083.26    | Moderate           |
| 1088.05    | Moderate           |
| 1089.00    | Moderate           |
| 1098.00    | Moderate           |
| 1002.01    | Middle             |
| 1002.02    | Middle             |
| 1002.03    | Middle             |
| 1012.00    | Middle             |
| 1020.00    | Middle             |
| 1051.01    | Middle             |
| 1060.00    | Middle             |
| 1061.00    | Middle             |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1063.03    | Middle             |
| 1066.06    | Middle             |
| 1066.08    | Middle             |
| 1066.09    | Middle             |
| 1067.04    | Middle             |
| 1067.05    | Middle             |
| 1068.02    | Middle             |
| 1069.03    | Middle             |
| 1069.06    | Middle             |
| 1069.07    | Middle             |
| 1069.09    | Middle             |
| 1069.11    | Middle             |
| 1069.14    | Middle             |
| 1072.07    | Middle             |
| 1072.14    | Middle             |
| 1072.24    | Middle             |
| 1074.01    | Middle             |
| 1074.04    | Middle             |
| 1074.06    | Middle             |
| 1074.07    | Middle             |
| 1076.08    | Middle             |
| 1077.03    | Middle             |
| 1078.01    | Middle             |
| 1078.08    | Middle             |
| 1078.09    | Middle             |
| 1080.05    | Middle             |
| 1080.06    | Middle             |
| 1080.07    | Middle             |
| 1082.01    | Middle             |
| 1082.04    | Middle             |
| 1082.15    | Middle             |
| 1082.16    | Middle             |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1082.17    | Middle             |
| 1082.26    | Middle             |
| 1082.30    | Middle             |
| 1082.36    | Middle             |
| 1082.38    | Middle             |
| 1083.02    | Middle             |
| 1083.04    | Middle             |
| 1083.07    | Middle             |
| 1083.19    | Middle             |
| 1083.20    | Middle             |
| 1084.02    | Middle             |
| 1084.03    | Middle             |
| 1084.04    | Middle             |
| 1085.06    | Middle             |
| 1085.08    | Middle             |
| 1085.14    | Middle             |
| 1085.15    | Middle             |
| 1085.21    | Middle             |
| 1085.24    | Middle             |
| 1085.25    | Middle             |
| 1085.26    | Middle             |
| 1085.27    | Middle             |
| 1086.04    | Middle             |
| 1087.06    | Middle             |
| 1087.07    | Middle             |
| 1087.08    | Middle             |
| 1088.02    | Middle             |
| 1088.04    | Middle             |
| 1090.01    | Middle             |
| 1090.03    | Middle             |
| 1092.02    | Middle             |
| 1093.00    | Middle             |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 1099.00    | Middle             |
| 1004.00    | Low                |
| 1005.00    | Low                |
| 1010.00    | Low                |
| 1013.00    | Low                |
| 1041.00    | Low                |
| 1043.00    | Low                |
| 1046.00    | Low                |
| 1049.00    | Low                |
| 1052.01    | Low                |
| 1052.02    | Low                |
| 1054.00    | Low                |
| 1056.00    | Low                |
| 1059.07    | Low                |
| 1063.01    | Low                |
| 1069.12    | Low                |
| 1069.17    | Low                |
| 1071.04    | Low                |
| 1072.15    | Low                |
| 1073.02    | Low                |
| 1073.06    | Low                |
| 1080.03    | Low                |
| 1082.07    | Low                |
| 1083.09    | Low                |
| 1088.03    | Low                |
| 1095.00    | Low                |
| 1100.00    | Low                |
| 1014.00    | Unknown            |
| 1050.00    | Unknown            |
| 1066.10    | Unknown            |
| 1067.06    | Unknown            |
| 1071.01    | Unknown            |





# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS

Census Tract List for Johnson County, Kansas  
 State = 20, MSA = 28140, County = 091

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0500.00    | Upper              |
| 0506.00    | Upper              |
| 0507.00    | Upper              |
| 0508.00    | Upper              |
| 0509.00    | Upper              |
| 0510.00    | Upper              |
| 0514.00    | Upper              |
| 0515.00    | Upper              |
| 0516.00    | Upper              |
| 0517.00    | Upper              |
| 0518.01    | Upper              |
| 0518.06    | Upper              |
| 0523.06    | Upper              |
| 0524.10    | Upper              |
| 0524.11    | Upper              |
| 0524.14    | Upper              |
| 0524.21    | Upper              |
| 0525.02    | Upper              |
| 0525.05    | Upper              |
| 0525.06    | Upper              |
| 0526.04    | Upper              |
| 0526.07    | Upper              |
| 0526.08    | Upper              |
| 0526.09    | Upper              |
| 0526.10    | Upper              |
| 0526.12    | Upper              |
| 0526.13    | Upper              |
| 0527.02    | Upper              |
| 0528.04    | Upper              |
| 0528.05    | Upper              |
| 0528.06    | Upper              |
| 0528.07    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0529.10    | Upper              |
| 0530.05    | Upper              |
| 0530.06    | Upper              |
| 0530.08    | Upper              |
| 0530.09    | Upper              |
| 0530.10    | Upper              |
| 0530.11    | Upper              |
| 0530.12    | Upper              |
| 0530.13    | Upper              |
| 0531.01    | Upper              |
| 0531.02    | Upper              |
| 0531.08    | Upper              |
| 0531.09    | Upper              |
| 0531.10    | Upper              |
| 0532.01    | Upper              |
| 0532.02    | Upper              |
| 0532.03    | Upper              |
| 0533.01    | Upper              |
| 0533.02    | Upper              |
| 0534.03    | Upper              |
| 0534.09    | Upper              |
| 0534.11    | Upper              |
| 0534.13    | Upper              |
| 0534.15    | Upper              |
| 0534.17    | Upper              |
| 0534.18    | Upper              |
| 0534.19    | Upper              |
| 0534.21    | Upper              |
| 0534.22    | Upper              |
| 0534.23    | Upper              |
| 0534.25    | Upper              |
| 0534.26    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0534.27    | Upper              |
| 0534.28    | Upper              |
| 0534.29    | Upper              |
| 0534.30    | Upper              |
| 0534.31    | Upper              |
| 0535.06    | Upper              |
| 0535.08    | Upper              |
| 0535.09    | Upper              |
| 0535.10    | Upper              |
| 0535.58    | Upper              |
| 0535.59    | Upper              |
| 0535.60    | Upper              |
| 0536.03    | Upper              |
| 0537.11    | Upper              |
| 0538.03    | Upper              |
| 0538.04    | Upper              |
| 0519.11    | Moderate           |
| 0520.04    | Moderate           |
| 0520.05    | Moderate           |
| 0520.06    | Moderate           |
| 0523.08    | Moderate           |
| 0524.23    | Moderate           |
| 0529.05    | Moderate           |
| 0529.06    | Moderate           |
| 0535.02    | Moderate           |
| 0535.55    | Moderate           |
| 0535.56    | Moderate           |
| 0535.57    | Moderate           |
| 0537.05    | Moderate           |
| 0501.00    | Middle             |
| 0502.00    | Middle             |
| 0503.01    | Middle             |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0503.02    | Middle             |
| 0504.00    | Middle             |
| 0505.00    | Middle             |
| 0511.00    | Middle             |
| 0512.00    | Middle             |
| 0513.00    | Middle             |
| 0518.03    | Middle             |
| 0518.04    | Middle             |
| 0518.05    | Middle             |
| 0518.07    | Middle             |
| 0519.02    | Middle             |
| 0519.04    | Middle             |
| 0519.07    | Middle             |
| 0519.08    | Middle             |
| 0519.09    | Middle             |
| 0519.10    | Middle             |
| 0519.12    | Middle             |
| 0520.01    | Middle             |
| 0521.01    | Middle             |
| 0521.02    | Middle             |
| 0522.01    | Middle             |
| 0522.02    | Middle             |
| 0523.04    | Middle             |
| 0523.05    | Middle             |
| 0523.07    | Middle             |
| 0524.15    | Middle             |
| 0524.16    | Middle             |
| 0524.17    | Middle             |
| 0524.19    | Middle             |
| 0524.22    | Middle             |
| 0525.07    | Middle             |
| 0526.06    | Middle             |



# FIDELITY BANK | OKLAHOMA FIDELITY BANK

## COMMUNITY REINVESTMENT ACT PUBLIC FILE

### ASSESSMENT AREAS

Census Tract List for Tulsa County, Oklahoma  
 State = 40, MSA = 46140, County = 143

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0031.00    | Upper              |
| 0032.00    | Upper              |
| 0033.00    | Upper              |
| 0035.00    | Upper              |
| 0036.00    | Upper              |
| 0041.01    | Upper              |
| 0042.00    | Upper              |
| 0043.01    | Upper              |
| 0043.02    | Upper              |
| 0045.00    | Upper              |
| 0051.00    | Upper              |
| 0052.00    | Upper              |
| 0054.01    | Upper              |
| 0054.04    | Upper              |
| 0058.08    | Upper              |
| 0058.09    | Upper              |
| 0058.10    | Upper              |
| 0058.11    | Upper              |
| 0058.12    | Upper              |
| 0065.06    | Upper              |
| 0067.08    | Upper              |
| 0067.09    | Upper              |
| 0067.10    | Upper              |
| 0067.12    | Upper              |
| 0069.01    | Upper              |
| 0069.02    | Upper              |
| 0074.09    | Upper              |
| 0074.12    | Upper              |
| 0074.16    | Upper              |
| 0074.17    | Upper              |
| 0075.18    | Upper              |
| 0075.19    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0075.20    | Upper              |
| 0075.23    | Upper              |
| 0075.26    | Upper              |
| 0075.27    | Upper              |
| 0075.28    | Upper              |
| 0075.29    | Upper              |
| 0075.30    | Upper              |
| 0075.31    | Upper              |
| 0075.32    | Upper              |
| 0075.33    | Upper              |
| 0075.34    | Upper              |
| 0075.35    | Upper              |
| 0075.36    | Upper              |
| 0076.11    | Upper              |
| 0076.12    | Upper              |
| 0076.13    | Upper              |
| 0076.14    | Upper              |
| 0076.16    | Upper              |
| 0076.30    | Upper              |
| 0076.31    | Upper              |
| 0076.32    | Upper              |
| 0076.33    | Upper              |
| 0076.34    | Upper              |
| 0076.36    | Upper              |
| 0076.38    | Upper              |
| 0076.39    | Upper              |
| 0076.47    | Upper              |
| 0076.49    | Upper              |
| 0076.51    | Upper              |
| 0076.52    | Upper              |
| 0076.53    | Upper              |
| 0076.54    | Upper              |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0076.56    | Upper              |
| 0077.03    | Upper              |
| 0077.05    | Upper              |
| 0078.03    | Upper              |
| 0078.04    | Upper              |
| 0087.00    | Upper              |
| 0090.14    | Upper              |
| 0090.15    | Upper              |
| 0090.16    | Upper              |
| 0090.18    | Upper              |
| 0090.20    | Upper              |
| 0002.00    | Moderate           |
| 0003.00    | Moderate           |
| 0008.00    | Moderate           |
| 0010.00    | Moderate           |
| 0012.00    | Moderate           |
| 0013.00    | Moderate           |
| 0014.00    | Moderate           |
| 0017.00    | Moderate           |
| 0027.00    | Moderate           |
| 0029.00    | Moderate           |
| 0030.00    | Moderate           |
| 0048.00    | Moderate           |
| 0049.00    | Moderate           |
| 0050.01    | Moderate           |
| 0057.00    | Moderate           |
| 0058.01    | Moderate           |
| 0058.13    | Moderate           |
| 0059.00    | Moderate           |
| 0060.00    | Moderate           |
| 0062.00    | Moderate           |
| 0067.01    | Moderate           |

| Tract Code | Tract Income Level |
|------------|--------------------|
| 0067.03    | Moderate           |
| 0068.01    | Moderate           |
| 0068.03    | Moderate           |
| 0068.04    | Moderate           |
| 0069.05    | Moderate           |
| 0069.06    | Moderate           |
| 0070.00    | Moderate           |
| 0071.01    | Moderate           |
| 0071.02    | Moderate           |
| 0072.00    | Moderate           |
| 0073.04    | Moderate           |
| 0073.06    | Moderate           |
| 0073.08    | Moderate           |
| 0073.10    | Moderate           |
| 0073.11    | Moderate           |
| 0073.12    | Moderate           |
| 0073.14    | Moderate           |
| 0074.02    | Moderate           |
| 0074.10    | Moderate           |
| 0074.11    | Moderate           |
| 0074.14    | Moderate           |
| 0075.25    | Moderate           |
| 0076.15    | Moderate           |
| 0076.17    | Moderate           |
| 0076.42    | Moderate           |
| 0076.43    | Moderate           |
| 0076.44    | Moderate           |
| 0076.46    | Moderate           |
| 0076.50    | Moderate           |
| 0077.04    | Moderate           |
| 0079.00    | Moderate           |
| 0080.02    | Moderate           |



**FIDELITY BANK | OKLAHOMA FIDELITY BANK**  
**COMMUNITY REINVESTMENT ACT PUBLIC FILE**

[Community Reinvestment Act Performance Evaluation Charter No. 25188 \(occ.gov\)](#)



## **PUBLIC DISCLOSURE**

October 5, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Fidelity Bank, N.A.  
Charter Number: 25188

100 E. English Street  
Wichita, Kansas 67202

Office of the Comptroller of the Currency

2959 North Rock Road, Suite 510  
Wichita, Kansas 67226

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

## Table of Contents

|   |     |
|---|-----|
| Overall CRA Rating.....                                       | 3   |
| Description of Institution .....                              | 4   |
| Scope of the Evaluation .....                                 | 5   |
| Discriminatory or Other Illegal Credit Practices Review ..... | 5   |
| State Rating.....   | 7   |
| State of Kansas.....  | 7   |
| State of Oklahoma.....  | 16  |
| Appendix A: Scope of Examination .....                        | A-1 |
| Appendix B: Summary of MMSA and State Ratings.....            | B-1 |
| Appendix C: Definitions and Common Abbreviations.....         | C-1 |
| Appendix D: Tables of Performance Data.....                   | D-1 |



## Overall CRA Rating

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

The following table indicates the performance level of Fidelity Bank, N.A. (Fidelity) with respect to the Lending, Investment, and Service Tests:

| Performance Levels        | Fidelity Bank, N.A.<br>Performance Tests |                 |              |
|---------------------------|--|-----------------|--------------|
|                           | Lending Test*                            | Investment Test | Service Test |
| Outstanding               |  |                 |              |
| High Satisfactory         | X  |                 | X            |
| Low Satisfactory          |  | X               |              |
| Needs to Improve          |  |                 |              |
| Substantial Noncompliance |  |                 |              |

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

The major factors that support this rating include:

- The Lending Test rating is based on good lending activity, adequate geographic distribution of loans, adequate lending to borrowers of different income levels, and the positive impact of Community Development (CD) lending in the state of Kansas. Performance in the state of Kansas contributed significantly to the overall rating, given that 89 percent of deposits and 87.4 percent of lending are within the Kansas Assessment Areas (AAs).
- The Investment Test rating is based on an adequate level of CD investments in Kansas and a good level of CD investments in Oklahoma. Performance in the state of Kansas contributed significantly to the overall rating.
- The Service Test rating is based on readily accessible retail delivery systems to geographies and individuals in the AAs and a relatively high level of CD services.

### Lending in Assessment Area

A high percentage of the bank’s loans are in its AAs.

Fidelity originated or purchased 65.4 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Fidelity’s business strategy of purchasing loans provided by a third-party as well as its National Lending Program impacts the inside/outside analysis since many of these loans are to borrowers outside of the AA.

| <b>Lending Inside and Outside of the Assessment Area</b> |                 |       |         |      |         |                                 |       |         |      |                |
|--|-----------------|-------|---------|------|---------|---------------------------------|-------|---------|------|----------------|
| Loan Category  | Number of Loans |       |         |      | Total # | Dollar Amount of Loans \$(000s) |       |         |      | Total \$(000s) |
|  | Inside          |       | Outside |      |         | Inside                          |       | Outside |      |                |
|  | #               | %     | #       | %    |         | \$                              | %     | \$      | %    |                |
| Home Mortgage  | 3,411           | 61.1  | 2,169   | 38.9 | 5,580   | 717                             | 61.7  | 446     | 38.3 | 1,163          |
| Small Business   | 1,052           | 84.8  | 188     | 15.2 | 1,240   | 196                             | 82.7  | 41      | 17.3 | 237            |
| Small Farm   | 1               | 100.0 | 0       | 0.0  | 1       | 1                               | 100.0 | 0       | 01   | 1              |
| Total  | 4,464           | 65.4  | 2,357   | 34.6 | 6,821   | 914                             | 65.2  | 487     | 34.8 | 1,401          |

We used loans made/purchased in the AA to evaluate the distribution of loans by income level of the geography and income level of the borrower.

## Description of Institution

Fidelity is a \$2.4 billion interstate financial institution headquartered in Wichita, Kansas. The bank is a wholly owned subsidiary of Fidelity Financial Corporation, a holding company in Wichita, Kansas with \$258 million in assets. The bank converted from a federally chartered thrift to a National Bank in September 2019. The bank has no affiliates requiring consideration for CRA activities.

Fidelity is a full-service banking institution that offers a broad range of banking services from operations in Kansas and Oklahoma. This includes services to commercial enterprises of all sizes as well as to individual customers. Fidelity offers commercial, real estate, and consumer credit products, with the bank's primary lending activities focusing on residential real estate mortgage lending. Fidelity also has an active loan servicing portfolio among its business lines. As of December 31, 2019, net loans and leases represented 79.2 percent of the bank's total assets. The bank's \$1.9 billion loan portfolio consisted of 38.4 percent real estate loans, 55.9 percent commercial and industrial loans, 4.9 percent consumer loans, and 0.7 percent other loans. Tier 1 capital totaled \$226 million as of December 31, 2019.

Fidelity has identified three AAs, two in Kansas and one in Oklahoma. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. We last evaluated Fidelity's CRA performance on October 2, 2017 and the bank received an overall rating of "Satisfactory".

Fidelity operates 21 full-service branches, 13 Automated Teller machines (ATMs), and 56 Interactive Banking Machines (IBMs) in Kansas and Oklahoma. The IBMs take deposits and are video interactive with customers. After hours, the IBM transitions to a traditional ATM. Fidelity has 15 branches in Kansas and six branches in Oklahoma. Within Kansas, 14 branches are in the Sedgwick County AA, and one branch is in the Johnson County AA. The remaining six branches are in the Oklahoma AA. Since the prior CRA evaluation, the bank closed the Moore, Oklahoma branch and changed its AA to Oklahoma County. The bank also has a Loan Production Office in Houston, Texas.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We analyzed loans originated and purchased from January 1, 2017 through December 31, 2019. The evaluation period for CD loans, investments, and services was October 3, 2017 through December 31, 2019.

The evaluation of lending products included home mortgage loans, small business loans, and CD loans. We more heavily weighted mortgage lending as 76.4 percent of loans made in the bank's AAs were Home Mortgage Disclosure Act (HMDA) reportable. Analyses were not conducted for any loan product unless Fidelity originated or purchased at least 20 loans within the AA. The bank did not originate or purchase a sufficient volume of farm loans in any AA to perform a meaningful analysis. Each AA was evaluated with proportionate weight assigned to its primary lending product.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

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

The bank's overall rating is a blend of state ratings. Performance in the state of Kansas received the most weight in the overall rating. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits dated June 30, 2019, reflected that the state of Kansas accounted for 89 percent of Fidelity's deposits and 71 percent of the offices. Loans made within the state of Kansas represented 87.4 percent of the bank's lending. As a result, the State of Kansas was given more weight when arriving at conclusions.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope of Evaluation" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the

relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Kansas

**CRA rating for the State of Kansas<sup>1</sup>:** Satisfactory  
**The Lending Test is rated:** High Satisfactory  
**The Investment Test is rated:** Low Satisfactory  
**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- An adequate geographic distribution of loans.
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- A good level of CD loans that had a positive impact on the lending rating.
- An adequate level of CD investments.
- Readily accessible retail delivery systems to geographies and individuals in the AA; and
- Relatively high level of CD services.

### Description of Institution's Operations in Kansas

Fidelity has two AAs in the state. The AAs consist of the Sedgwick County AA which is part of the Wichita MA #43620, and the Johnson County AA which is part of the Kansas City MA #28140. The Sedgwick County AA is the bank's largest AA in the state of Kansas. As of December 31, 2019, Fidelity operated 15 branches, seven ATMs, and 45 IBMs in the state of Kansas. All but one branch is in the Sedgwick County AA, with one branch in the Johnson County AA.

Total deposits in the state of Kansas as of June 30, 2019, was \$1.7 billion. Branches in the Sedgwick County AA held deposits of \$1.6 billion as of June 30, 2019. This places Fidelity third in deposit market share in the Sedgwick County AA, with 12.1 percent of all deposits.

#### Sedgwick County AA

The table on the following page provides a summary of the demographic profile of the Sedgwick County AA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects 41.1 percent of the tracts in the AA are low- and moderate-income tracts. The demographic data shows a low percentage of home ownership in low- and moderate-income geographies with 25.4 percent of 123,624 owner occupied units in low- and moderate-income census tracts. Rental units in low- and moderate-income tracts total 52.2 percent of total occupied rental units.

---

<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

| Table A – Demographic Information of the Assessment Area   |         |            |                              |               |              |            |
|--|---------|------------|------------------------------|---------------|--------------|------------|
| Assessment Area: 2017-2019 Sedgwick County KS AA   |         |            |                              |               |              |            |
| Demographic Characteristics  | #       | Low % of # | Moderate % of #              | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts)  | 124     | 12.1       | 29.0                         | 27.4          | 31.5         | 0.0        |
| Population by Geography  | 506,529 | 9.3        | 24.9                         | 28.5          | 37.2         | 0.0        |
| Housing Units by Geography   | 213,700 | 10.4       | 26.8                         | 29.4          | 33.4         | 0.0        |
| Owner-Occupied Units by Geography  | 123,624 | 5.8        | 19.6                         | 29.0          | 45.6         | 0.0        |
| Occupied Rental Units by Geography   | 69,337  | 16.1       | 36.1                         | 31.6          | 16.2         | 0.0        |
| Vacant Units by Geography  | 20,739  | 18.7       | 39.2                         | 24.0          | 18.1         | 0.0        |
| Businesses by Geography  | 29,379  | 6.2        | 28.2                         | 27.0          | 38.6         | 0.0        |
| Farms by Geography   | 928     | 3.8        | 15.2                         | 21.8          | 59.3         | 0.0        |
| Family Distribution by Income Level  | 124,645 | 21.7       | 17.7                         | 20.9          | 39.8         | 0.0        |
| Household Distribution by Income Level   | 192,961 | 24.3       | 16.8                         | 18.3          | 40.6         | 0.0        |
| Median Family Income MSA - 48620<br>Wichita, KS MSA  |         | \$64,331   | Median Housing Value         |               |              | \$123,957  |
|  |         |            | Median Gross Rent            |               |              | \$745      |
|  |         |            | Families Below Poverty Level |               |              | 11.0%      |
| <i>Source: 2015 ACS and 2019 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |         |            |                              |               |              |            |

**Economic Data**

Based on the June 2020 Moody’s Analytics report, the Wichita, Kansas MSA’s top employers are Spirit AeroSystems, Inc., Textron Aviation, and McConnell Air Force Base. Manufacturing is the largest employer in the area, accounting for 18.0 percent of total employment. Education and health services account for 15.3 percent of total employment and government employs 13.7 percent of individuals. The strengths of Wichita’s economy are low costs of doing business, relatively affordable housing, manufacturing that serves a global market, aerospace being less exposed to outsourcing, tariffs, and other changes in trade policies.

Based on data from the U.S. Bureau of Labor Statistics the unemployment rate for the area has decreased from an annual rate of 4.2 percent in 2017, to 3.6 percent in 2018, to 3.4 percent in 2019. According to the U.S. Census Bureau the median household income from 2014-2018 was \$54,974 in Sedgwick County, similar to the entire state of Kansas median of \$57,422. Median owner costs with individuals with a mortgage from 2014-2018 was \$1,275 in Sedgwick County, which is below the state median of \$1,349, and the national median of \$1,558. Median rent for Sedgwick County was \$803 over the same time period, similar to the statewide median of \$831, but well below the national median of \$1,023.

The OCC used existing community contacts to assess the credit needs and opportunities in the Sedgwick County AA. Community contacts noted economic trends are strong or trending up and felt that credit needs are generally addressed in the area. One contact stated the main credit need is to provide credit to those that struggle to qualify for credit.

## Scope of Evaluation in Kansas

As of June 30, 2019, Fidelity's two AAs located in the State of Kansas held 89 percent of the bank's total deposits and originated 87.4 percent of the loans in the AAs during the evaluation period. Therefore, the State of Kansas will receive the most weight in the overall CRA rating.

We performed a full-scope review of the Sedgwick County AA. This AA held 95.8 percent of Fidelity's deposits in Kansas and originated 83.2 percent of all loans originated in Kansas AAs during the evaluation period. We weighted home mortgage lending more heavily than small business lending, as these products represented 75.4 percent of the number and 77 percent of the dollar volume of all loans originated in the AA during the evaluation period.

We performed a limited-scope review of the Johnson County AA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sedgwick County AA is good.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

| Number of Loans* |               |                |            |                       |       |              |                 |
|------------------|---------------|----------------|------------|-----------------------|-------|--------------|-----------------|
| Assessment Area  | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State Loans | %State Deposits |
| Sedgwick County  | 2,447         | 799            | 1          | 23                    | 3,270 | 83.3         | 95.8            |
| Johnson County   | 610           | 46             | 0          | 0                     | 656   | 16.7         | 4.2             |

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

| Dollar Volume of Loans* |               |                |            |                       |         |              |                 |
|-------------------------|---------------|----------------|------------|-----------------------|---------|--------------|-----------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total   | %State Loans | %State Deposits |
| Sedgwick County         | 418,911       | 125,004        | 1          | 22,928                | 566,844 | 75.8         | 95.8            |
| Johnson County          | 166,578       | 13,955         | 0          | 0                     | 180,533 | 24.2         | 4.2             |

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

Lending levels reflect good responsiveness to individuals and businesses in the Sedgwick County AA, relative to the credit needs and the bank's deposit market share within the area. As of June 30, 2019, Fidelity ranked third in the Sedgwick County AA with a deposit market share of 12.1 percent.

Home mortgage lending activity in the AA is excellent. Fidelity originated 2,447 loans totaling \$419 million to borrowers in the Sedgwick County AA during the evaluation period. The lending level

for home mortgage loans reflects an excellent responsiveness to credit needs in the Sedgwick County AA. The most recent market share data (2019) for home mortgage lending reflects that Fidelity was ranked first in the market with 5.2 percent of the total dollar volume in the AA and second in the market with the number of loans at 4.5 percent.

Small business lending activity in the Sedgwick County AA is good. Fidelity originated 799 loans totaling \$125 million to small businesses during the evaluation period. The most recent market share data (2018) for lending to small businesses reflects that Fidelity was ranked third in the market with 8.7 percent of the total dollar volume in the AA and tenth with 3.2 percent of the number of loans.

### **Distribution of Loans by Income Level of the Geography**

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

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

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

The geographic distribution of home mortgage loans is adequate. Fidelity was below demographics and near to the aggregate data for low-income tracts. The bank was below both demographics and aggregate data for moderate-income tracts. In evaluating the geographic distribution of home loans in the Sedgwick County AA, it is important to note that according to the 2015 ACS Census data, low-income census tracts contained 5.8 percent of the total owner-occupied housing units in the AA. Based on this statistic, the bank has limited opportunities for home mortgage lending in low-income census tracts.

#### ***Small Loans to Businesses***

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

The geographic distribution of loans to small businesses is adequate. The percentage of loans made in low-income geographies exceeded the percentage of businesses in the low-income geographies but was lower than aggregate data. The percentage of loans made in moderate-income tracts was lower than both demographics and aggregate data.

#### ***Lending Gap Analysis***

We analyzed Fidelity's lending activity during the evaluation period to identify gaps in the geographic distribution of loans and did not identify any unexplained gaps.

### **Distribution of Loans by Income Level of the Borrower**

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



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

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

Fidelity exhibited good distribution of home mortgage loans. The bank was significantly below demographics for low-income borrowers but exceeded aggregate data. The bank exceeded both demographic and aggregate data for moderate-income borrowers.

### ***Small Loans to Businesses***

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

Fidelity exhibited poor distribution of loans to businesses with revenues less than \$1 million. The bank was significantly below the percentage of businesses in the AA with revenues less than \$1 million and significantly below the aggregate data.

### **Community Development Lending**

The institution made a good level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, Fidelity originated 23 loans totaling \$22.9 million in the Sedgwick County AA. The bank made 15 loans totaling \$4.6 million assisting affordable housing for low- and moderate-income individuals. The bank made three loans totaling \$2.1 million with a primary purpose of assisting community services. The bank made one loan totaling \$2 million with the primary purpose of economic development, and four loans totaling \$14.3 million with the primary purpose of revitalization and stabilization of low- and moderate-income tracts.

Examples of CD Lending include:

- A loan totaling \$10.8 million to revitalize a low-to-moderate income tract constructing multifamily housing.
- A loan totaling \$1.4 million to renovate and revitalize a warehouse/industrial building into an open office space for a local company to relocate their headquarters.
- A \$2.0 million loan assisting in the retention of jobs for low- and moderate-income individuals.
- Thirteen loans totaling \$1.45 million to construct homes for low- and moderate-income individuals.

### **Product Innovation and Flexibility**

The institution makes significant use of innovative and/or flexible lending practices in order to serve AA credit needs.

Fidelity offers home mortgage products that are flexible. These include various products designed to facilitate home ownership for low- and moderate-income borrowers. These programs include the Federal

Housing Administration (FHA), the Veteran's Administration (VA), and the U.S. Department of Agriculture/Rural Development (USDA). These programs offer borrowers an opportunity to obtain home financing on more flexible terms like lower down payment requirements, seller paid closing costs, down payment flexibility, and approval qualifications for borrowers with lower credit scores. VA and USDA loans also allow 100 percent financing.

Fidelity also offers the Equity Builder Home Loan program. This is a fixed rate home loan with no down payment requirements. During the evaluation period, Fidelity originated three home loans in the AA for \$545,000 and one outside the AA for \$330,000 with this program. The bank also partners with the Small Business Administration (SBA) to originate small business loans.

During the evaluation period, Fidelity originated 489 flexible or innovative home loans totaling \$78.8 million in the AA, and 117 or \$18.1 million outside of the AA.

### Conclusions for Area Receiving a Limited-Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in the Johnson County AA is consistent with the bank's overall performance under the Lending Test in the full-scope area(s).

Refer to Tables O through R in the state of Kansas section of Appendix D for the facts and data that support these conclusions.

### INVESTMENT TEST

The bank's performance under the Investment Test in Kansas is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Sedgwick AA is adequate.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The bank's investment performance was somewhat negatively impacted by a process change by the OCC that resulted in a shorter evaluation period of 27 months for CD activity in relation to retail lending activity of 36 months.

| Qualified Investments   |               |                |                |           |          |              |                |               |                        |            |
|-------------------------|---------------|----------------|----------------|-----------|----------|--------------|----------------|---------------|------------------------|------------|
| Assessment Area         | Prior Period* |                | Current Period |           | Total    |              |                |               | Unfunded Commitments** |            |
|                         | #             | \$(000's)      | #              | \$(000's) | #        | % of Total # | \$(000's)      | % of Total \$ | #                      | \$(000's)  |
| <b>Full-Scope:</b>      |               |                |                |           |          |              |                |               |                        |            |
| Sedgwick County AA      | 0             | \$0            | 23             | \$3,325   | 23       | 79.4         | \$3,325        | 39.8          | 0                      | \$0        |
| <b>Limited-Scope</b>    |               |                |                |           |          |              |                |               |                        |            |
| Johnson County AA       | 0             | 0              | 3              | \$2       | 3        | 10.3         | \$2            | 0.0%          | 0                      | \$0        |
| <b>Kansas Statewide</b> | <b>3</b>      | <b>\$5,029</b> | <b>0</b>       | <b>0</b>  | <b>3</b> | <b>10.3</b>  | <b>\$5,029</b> | <b>60.2</b>   | <b>0</b>               | <b>\$0</b> |

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Performance in the Sedgwick County assessment area is adequate. During the evaluation period, investments totaled \$3.3 million that represented 1.7 percent of allocated tier one capital.

Fidelity purchased five investments totaling \$2.5 million in the Sedgwick County AA supporting affordable housing for low- and moderate-income individuals. The bank purchased three investments totaling \$100,000 in the Sedgwick County AA supporting economic development to allow affordable health care to low- and moderate-income individuals. Fidelity made five donations totaling \$495,000 towards the revitalization and stabilization of a low- or moderate-income tract and made 10 grants, totaling \$217,000 to nine organizations in the Sedgwick County AA during the evaluation period. The grants supported organizations providing community services, such as providing health education, financial literacy, and training to individuals in low- and moderate-income areas.

The bank has three prior investments that benefited the broader statewide or regional area that included the bank’s AAs totaling \$5 million or 2.5 percent of allocated capital.

**Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank’s performance under the Investment Test in the Johnson County AA is weaker than the bank’s overall performance under the Investment Test in the full-scope area.

**SERVICE TEST**

The bank’s performance under the Service Test in Kansas is rated High Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Sedgwick County AA is good.

**Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

| Distribution of Branch Delivery System |                                |                    |                                |   |      |      |       |                                       |      |      |      |
|--|--------------------------------|--------------------|--------------------------------|---|------|------|-------|---------------------------------------|------|------|------|
| Assessment Area                        | Deposits                       | Branches           |                                |   |      |      |       | Population                            |      |      |      |
|  | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) |      |      |       | % of Population within Each Geography |      |      |      |
|  |                                |                    |                                | Low   | Mod  | Mid  | Upp   | Low                                   | Mod  | Mid  | Upp  |
| Sedgwick County                        | 95.8                           | 14                 | 100.00                         | 0.00  | 35.7 | 35.7 | 28.8  | 9.3                                   | 24.9 | 28.5 | 37.3 |
| Johnson County                         | 4.2                            | 1                  | 100.00                         | 0.00  | 0.00 | 0.00 | 100.0 | .90                                   | 7.7  | 32.8 | 58.5 |

Branches are reasonably accessible to essentially all geographies and individuals of different income levels. The bank has five branches in moderate-income geographies. The percentage of branches in

moderate-income geographies exceeds the percentage of population living in these geographies. The bank does not have any branches in low-income tracts.

Fidelity’s hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

| Distribution of Branch Openings/Closings |                          |                      |   |          |        |       |
|--|--------------------------|----------------------|---|----------|--------|-------|
| Assessment Area                          | Branch Openings/Closings |                      |   |          |        |       |
|  | # of Branch Openings     | # of Branch Closings | Net change in Location of Branches (+ or -) |          |        |       |
|  |                          |                      | Low   | Moderate | Middle | Upper |
| Sedgwick County                          | 1                        | 0                    | 0   | +1       | 0      | 0     |
| Johnson County                           | 0                        | 0                    | 0   | 0        | 0      | 0     |

To the extent changes have been made, the institution’s opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened a branch in a moderate-income tract during the evaluation period and did not close any branches in Kansas.

Management compliments its traditional service delivery methods with alternative delivery processes, including ATMs, IBMs, an interactive telephone banking service, internet banking services, and a free mobile banking application that also allows mobile deposits. Another delivery service available is mobile wallet that allows payment via Apple Pay, Samsung Pay, and Android Pay at the merchant’s point of sale, if enabled. Customers can also access cash at Fidelity ATMs via cardless cash rather than using an ATM card. Fidelity debit cards can be used at any ATM or merchant that accepts VISA. These delivery methods provide increased access to banking services throughout all areas in the AA. The bank offers 45 IBMs in the Sedgwick County AA with one being in a low-income tract and 14 in moderate-income tracts

**Community Development Services**

The institution provides a relatively high level of CD services.

Fidelity provides a relatively high level of CD services within the Sedgwick AA. The bank had 29 different employees providing 819 hours CD services to 16 different organizations. The bank also has two different servicing departments providing 262 hours CD services to one organization. Examples of service hours include the following:

- Serviced loans for affordable housing for low- and moderate-income individuals.
- Provided financial expertise for SBA 504 loans, promoting economic expansion.
- Provided guidance on financial decisions and allocation of funds for community services to low- and moderate-income individuals.
- Provided financial literacy and education to students in grades kindergarten through 12<sup>th</sup> grade.

## **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's performance under the Service Test in the Johnson County AA is weaker than the bank's overall performance under the Service Test in the full-scope area.

## State Rating

### State of Oklahoma

**CRA rating for the State of (name of State)<sup>2</sup>:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- An adequate level of lending activity.
- A good geographic distribution of loans.
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- A good level of CD investments.
- Readily accessible retail delivery systems to geographies and individuals in the AA; and
- Relatively high level of CD services.

### Description of Institution's Operations in Oklahoma

Fidelity has one AA in Oklahoma. For the period January 1, 2017 through March 15, 2019, the AA consisted of Oklahoma and Cleveland Counties. After closing a branch in Moore, Oklahoma from March 16, 2019 through December 31, 2019, the AA consisted of Oklahoma County, which is part of the Oklahoma City, OK MSA #36420. As of December 31, 2019, Fidelity operated six branches, six ATMs, and nine IBMs in the state of Oklahoma. All but two of the branches are in Oklahoma City, Oklahoma. The bank has approximately \$26.8 million in deposits in Oklahoma, representing 11 percent of the bank's total deposits.

#### Oklahoma AA

The table on the following page provides a summary of the demographic profile of the Oklahoma AA from January 1, 2017 through March 15, 2019, by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects 40.9 percent of the tracts in the AA are low- and moderate-income. The demographic data shows a low percentage of home ownership in low- and moderate-income geographies with 25.6 percent of 236,895 owner occupied units in low- and moderate-income tracts rental units totaled 50.8 percent of 153,771 total occupied rental units in low- and moderate-income census tracts.

---

<sup>2</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

| <b>Table A – Demographic Information of the Assessment Area</b>  |           |                       |                              |                          |                         |                       |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 1/1/2017 - 3/15/2019 Oklahoma AA (Cleveland-Oklahoma)</b>  |           |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 303       | 9.2                   | 31.7                         | 32.0                     | 24.1                    | 3.0                   |
| Population by Geography  | 1,023,094 | 7.8                   | 27.4                         | 34.6                     | 29.8                    | 0.3                   |
| Housing Units by Geography   | 435,859   | 7.7                   | 29.4                         | 34.6                     | 27.9                    | 0.4                   |
| Owner-Occupied Units by Geography  | 236,895   | 4.4                   | 21.2                         | 37.3                     | 36.9                    | 0.1                   |
| Occupied Rental Units by Geography   | 153,771   | 11.4                  | 39.4                         | 31.5                     | 17.0                    | 0.7                   |
| Vacant Units by Geography  | 45,193    | 12.2                  | 38.3                         | 31.0                     | 17.9                    | 0.7                   |
| Businesses by Geography  | 97,944    | 4.9                   | 23.4                         | 32.4                     | 35.7                    | 3.5                   |
| Farms by Geography   | 2,239     | 4.1                   | 20.2                         | 33.9                     | 40.7                    | 1.1                   |
| Family Distribution by Income Level  | 247,112   | 22.7                  | 17.3                         | 19.9                     | 40.1                    | 0.0                   |
| Household Distribution by Income Level   | 390,666   | 24.6                  | 17.0                         | 17.8                     | 40.5                    | 0.0                   |
| Median Family Income MSA - 36420<br>Oklahoma City, OK MSA  |           | \$64,058              | Median Housing Value         |                          |                         | \$138,852             |
|  |           |                       | Median Gross Rent            |                          |                         | \$803                 |
|  |           |                       | Families Below Poverty Level |                          |                         | 12.3%                 |
| <i>Source: 2015 ACS and 2019 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |           |                       |                              |                          |                         |                       |

The table on the following page provides a summary of the demographic profile of the Oklahoma AA from March 16, 2019 through December 31, 2019, by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects 46.9 percent of the tracts in the AA are low- and moderate-income. The demographic data shows a low percentage of home ownership in low- and moderate- income geographies with 31.9 percent of 171,014 owner occupied units in low- and moderate- income census tracts. Rental units in low- and moderate-income geographies represent a significant level, totaling 57.6 percent of 120,376 total occupied rental units.

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 3/16/2019 – 12/31/2019 Oklahoma AA (Oklahoma County)</b>                             |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 241      | 11.6                  | 35.3                         | 29.0                     | 20.7                    | 3.3                   |
| Population by Geography  | 754,480  | 10.6                  | 32.4                         | 29.7                     | 26.9                    | 0.4                   |
| Housing Units by Geography   | 326,985  | 10.2                  | 34.0                         | 29.9                     | 25.4                    | 0.5                   |
| Owner-Occupied Units by Geography  | 171,014  | 6.1                   | 25.8                         | 32.5                     | 35.4                    | 0.1                   |
| Occupied Rental Units by Geography   | 120,376  | 14.5                  | 43.1                         | 27.2                     | 14.2                    | 0.9                   |
| Vacant Units by Geography  | 35,595   | 15.5                  | 42.1                         | 26.7                     | 14.9                    | 0.8                   |
| Businesses by Geography  | 77,877   | 6.2                   | 25.6                         | 30.1                     | 33.8                    | 4.4                   |
| Farms by Geography   | 1,675    | 5.5                   | 23.8                         | 29.5                     | 39.7                    | 1.5                   |
| Family Distribution by Income Level  | 181,431  | 24.7                  | 17.9                         | 19.1                     | 38.3                    | 0.0                   |
| Household Distribution by Income Level   | 291,390  | 26.1                  | 17.7                         | 17.5                     | 38.7                    | 0.0                   |
| Median Family Income MSA - 36420<br>Oklahoma City, OK MSA  |          | \$64,058              | Median Housing Value         |                          |                         | \$135,429             |
|  |          |                       | Median Gross Rent            |                          |                         | \$794                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 13.8%                 |
| <i>Source: 2015 ACS and 2019 D&amp;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> |          |                       |                              |                          |                         |                       |

## Economic Data

Based on the May 2020 Moody's Analytics report, the Oklahoma City, Oklahoma top employers are Tinker Air Force Base, the University of Oklahoma, FAA Mike Monroney Aeronautical Center, and Integris Health. Government employees make up 19.8 percent of total employment in the area with education and health services making up 14.6 percent of total employment. The area has experienced positive net migration and growth that exceeds the national average. The area has a diverse economy that features a set of non-energy drivers with a high concentration of prime-age workers.

Based on data from the U.S. Bureau of Labor Statistics the unemployment rate for the area has decreased year over year from 4.4 percent in 2017 to 3.9 percent in 2018 to 3.7 percent in 2019.

According to the U.S. Census Bureau, the median household income from 2014-2018 was \$62,863 in Cleveland County, Oklahoma and \$52,855 in Oklahoma County, Oklahoma. The entire state of Oklahoma had a median household income of \$51,424. The poverty rate in Cleveland County, Oklahoma is 11.9 percent and 16.9 percent in Oklahoma County, Oklahoma. The state average is 15.2 percent and the national average is 10.5 percent. Median owner costs with individuals with a mortgage from 2014-2018 was \$1,365 in Cleveland County, Oklahoma and \$1,334 in Oklahoma County, Oklahoma which are both above the state median of \$1,214, but below the national median of \$1,558. Median rent for Cleveland County, OK was \$908 and \$851 in Oklahoma County, Oklahoma over the same time period, which is higher than the statewide median of \$793, but well below the national median of \$1,023.



We used existing community contacts to assess the community credit needs and funding opportunities for financial institutions in the Oklahoma AA. Community contacts identified the need for more affordable housing and additional employment opportunities for low- and moderate- income individuals through business and manufacturing development. The contacts indicated that many area banks are good community partners, and quick to support the funding needs of the local market. Some banks have even offered financial literacy seminars to area residents.

**Scope of Evaluation in Oklahoma**

As of June 30, 2019, Fidelity’s one AA located in the state of Oklahoma held 11 percent of the bank’s total deposits and originated 12.6 percent of all loans during the evaluation period. We will perform a full-scope review of the AA. Due to the closing of a branch, the bank’s AA changed on March 16, 2019, so the OCC performed two analyses with two evaluation periods: Period 1 (January 1, 2017 through March 15, 2019) includes Cleveland and Oklahoma Counties in the AA, and Period 2 (March 16, 2019 through December 31, 2019) includes Oklahoma county.

We weighted home mortgage lending more heavily than small business lending, as these products represented 63.1 percent of the number and 71.9 percent of the dollar volume of all loans originated in the AA during the evaluation period. We also weighted Period 1 more heavily, as it represented a longer time period and represented a majority of the loans made during the evaluation period.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA**

**LENDING TEST**

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

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Oklahoma AA is adequate.

**Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs.

| Number of Loans* |               |                |            |                       |       |              |                 |
|------------------|---------------|----------------|------------|-----------------------|-------|--------------|-----------------|
| Assessment Area  | Home Mortgage | Small Business | Small Farm | Community Development | Total | %State Loans | %State Deposits |
| Oklahoma AA      | 354           | 207            | 0          | 0                     | 561   | 100          | 100             |

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

| Dollar Volume of Loans* |               |                |            |                       |         |              |                 |
|-------------------------|---------------|----------------|------------|-----------------------|---------|--------------|-----------------|
| Assessment Area         | Home Mortgage | Small Business | Small Farm | Community Development | Total   | %State Loans | %State Deposits |
| Oklahoma AA             | 131,088       | 51,287         | 0          | 0                     | 182,375 | 100          | 100             |

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

Lending levels reflect adequate responsiveness to individuals and businesses in the Oklahoma AA in relation to area credit needs and the bank's deposit market share. As of June 30, 2019, Fidelity ranked twenty-ninth in the Oklahoma AA with a deposit share of 0.83 percent.

Home mortgage lending activity in the AA is adequate. Fidelity originated 354 loans totaling \$131 million to borrowers in the Oklahoma AA during the evaluation period. The lending level for home mortgage loans reflects an adequate responsiveness to credit needs in the Oklahoma AA. The most recent market share data (2019) for home mortgage lending reflects that Fidelity was ranked 57<sup>th</sup> in the market based on the number of loans with 0.41 percent.

Small business lending activity in the Oklahoma AA is adequate. The bank originated 207 loans totaling 51.2 million to small businesses during the evaluation period. The most recent market share data (2018) for lending to small businesses reflects that Fidelity was ranked 28<sup>th</sup> in the market based on number of loans with 0.42 percent.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA(s).

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

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

The geographic distribution of home mortgage loans is good. During the January 1, 2017 through March 15, 2019 evaluation period, the bank was lower than demographics and exceeded the aggregate data for low-income tracts. The bank was near to demographics and exceeded aggregate data for moderate-income tracts. During the March 16, 2019 through December 31, 2019 evaluation period, the bank did not make any home mortgage loans in low-income tracts. The bank was lower than demographics and was near to aggregate data in the moderate-income tracts. In evaluating the geographic distribution of home loans in the Oklahoma AA, it is important to note that, according to the 2015 ACS Census data, low-income census tracts contained 4.4 and 6.1 percent of the total owner-occupied housing units in the AA for Periods 1 and 2, respectively. Based on these statistics, the bank has limited opportunities for home mortgage lending in low-income census tracts.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to businesses is good. During the January 1, 2017 through March 15, 2019 evaluation period, the percentage of loans made in low-income tracts exceeded both demographics and aggregate data. The bank's performance was lower than demographics and aggregate data in the moderate-income tracts. During the March 16, 2019 through December 31, 2019 evaluation period, the bank's performance exceeded both demographics and aggregate data in low-income tracts. The bank's performance was lower than demographics and aggregate data in the moderate-income tracts.

***Lending Gap Analysis***

We analyzed Fidelity's lending activity over the evaluation period to identify gaps in the geographic distribution of loans and did not identify any unexplained gaps.

**Distribution of Loans by Income Level of the Borrower**

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

***Home Mortgage Loans***

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

The distribution of home mortgage loans among individuals of different income levels is adequate. During the January 1, 2017 through March 15, 2019 evaluation period, the bank's performance was significantly lower than demographics and lower than the aggregate data for low-income borrowers. The bank's performance was lower than demographics and aggregate data for moderate-income borrowers. For the March 16, 2019 through December 31, 2019 evaluation period, the bank was significantly lower than demographics and lower than aggregate data for low-income borrowers. The bank exceeded demographics and aggregate data to the moderate-income borrowers.

***Small Loans to Businesses***

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

The distribution of small loans to businesses with revenues less than or equal to \$1 million is adequate. During the January 1, 2017 through March 15, 2019 evaluation period, the bank's performance was lower than demographics but exceeded aggregate data. However, businesses with revenues not available accounted for 13.7 percent of the bank's loans. For the March 16, 2019 through December 31, 2019 evaluation period, the bank was significantly lower than demographics and lower than aggregate data. However, business's with revenues not available accounted for 37 percent of the bank's loans.

**Community Development Lending**

The institution has made few, if any, CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank did not make any CD loans during the evaluation period in the Oklahoma AA.

**Product Innovation and Flexibility**

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Fidelity offers flexible mortgage products which includes products to facilitate home ownership for low- and moderate-income individuals. These products include loan programs with the FHA, VA, and the USDA. FHA loans offer low down payment requirements and borrower may qualify with a lower credit score. Fidelity originated one FHA Bond loan totaling \$165,000 and 44 FHA fixed rate loans totaling \$5.8 million in the Oklahoma AA over the evaluation period. VA loans offer 100 percent financing and offers qualifying with a lower minimum credit score. The bank originated 14 VA loans totaling \$2.6 million in the Oklahoma AA over the evaluation period. USDA loans also offer 100 percent financing and no monthly mortgage insurance premiums, but there is an upfront insurance premium. The bank originated one USDA loans totaling \$107,000 in Oklahoma over the evaluation period. Fidelity also partners with the SBA, originating loans that meet their loan program requirements.

The bank utilizes innovation in offering the Equity Builder loan product. This is a fixed-rate home loan with no down payment requirements, removing a potential barrier to homeownership. These loans support the development and construction of affordable housing to low- and moderate-income families. The bank did not originate any Equity Builder loans in Oklahoma during the evaluation period.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Oklahoma is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review/full-scope review, the bank’s performance in the Oklahoma AA is good.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The bank’s investment performance was somewhat negatively impacted by a process change by the OCC, that resulted in a shorter evaluation period of 27 months for CD activity in relation to retail lending activity of 36 months.

| Qualified Investments |               |           |                |           |       |              |           |               |                        |           |
|-----------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|------------------------|-----------|
| Assessment Area       | Prior Period* |           | Current Period |           | Total |              |           |               | Unfunded Commitments** |           |
|                       | #             | \$(000's) | #              | \$(000's) | #     | % of Total # | \$(000's) | % of total \$ | #                      | \$(000's) |
| Full-Scope:           |               |           |                |           |       |              |           |               |                        |           |
| Oklahoma AA           | 0             | \$0       | 5              | \$2,006   | 5     | 100.0        | \$2,006   | 10            | 0                      | \$0       |

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Performance in the assessment area is good. During the evaluation period, investments totaled \$2 million and represented 8.1 percent of allocated tier one capital.

The bank purchased one investment totaling \$2 million in the Oklahoma AA during the evaluation period. This investment supported affordable housing for low- and moderate-income individuals. The bank made four grants totaling \$5,000 to two organizations in the Oklahoma AA during the evaluation period. These grants support a low- and moderate-income client base helping in disaster and homeless

services, health education, special needs care, affordable housing, child abuse prevention, and providing financial education.

**SERVICE TEST**

The bank’s performance under the Service Test in Oklahoma is rated High Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Oklahoma AA is good.

**Retail Banking Services**

Service delivery systems are readily accessible geographies and individuals of different income levels in the institution’s AA.

| Distribution of Branch Delivery System |                                |                    |                                |   |      |      |      |                                       |      |      |      |
|--|--------------------------------|--------------------|--------------------------------|---|------|------|------|---------------------------------------|------|------|------|
| Assessment Area                        | Deposits                       | Branches           |                                |   |      |      |      | Population                            |      |      |      |
|  | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) |      |      |      | % of Population within Each Geography |      |      |      |
|  |                                |                    |                                | Low   | Mod  | Mid  | Upp  | Low                                   | Mod  | Mid  | Upp  |
| Oklahoma AA                            | 100.00                         | 6                  | 100.0                          | 0.00  | 16.7 | 33.3 | 50.0 | 10.6                                  | 32.4 | 29.8 | 26.9 |

Branches are reasonably accessible to essentially all geographies and individuals of different income levels. Fidelity has one branch in moderate-income geographies and does not have any branches in low-income tracts.

Fidelity’s hours and services offered throughout the AA do not vary in a way that inconveniences portions of the AA, particularly moderate-income geographies or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

| Distribution of Branch Openings/Closings |                      |                      |   |          |        |       |
|--|----------------------|----------------------|---|----------|--------|-------|
| Assessment Area                          | # of Branch Openings | # of Branch Closings | Branch Openings/Closings                    |          |        |       |
|  |                      |                      | Net change in Location of Branches (+ or -) |          |        |       |
|  |                      |                      | Low   | Moderate | Middle | Upper |
| Oklahoma AA                              | 0                    | 1                    | 0   | 0        | -1     | 0     |

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Services, including where appropriate, business hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

Management compliments its traditional service delivery methods with alternative delivery processes, including ATMs, IBMs, an interactive telephone banking service, internet banking service, and a free mobile banking application that also allows mobile deposit. Another delivery service available is mobile wallet that allows payment via Apple Pay, Samsung Pay, and Android Pay at the merchant's point of sale, if enabled. Customers can also access cash at Fidelity ATMs via cardless cash rather than using an ATM card. Fidelity debit cards can be used at any ATM or merchant that accepts VISA. These delivery methods provide increased access to banking services throughout all areas in the AA. The bank offers 11 IBMs in Oklahoma, with one located in a moderate-income tract.

### **Community Development Services**

The institution provides a relatively high level of CD services.

Fidelity provides a relatively high level of CD services within the Oklahoma AA. The bank had four different employees providing 147 hours CD services to two different organizations. The bank also has two different servicing departments providing 972 hours CD services to one organization. Examples of service hours included the following:

- Serviced loans for affordable housing for low- and moderate-income individuals.
- Provided guidance on financial decisions and allocation of funds for community services to low- and moderate-income individuals.
- Provided financial literacy and education to students in grades kindergarten through 12<sup>th</sup> grade.

## Appendix A: Scope of Examination

---

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

|   |   |                                 |
|---|---|---------------------------------|
| <b>Time Period Reviewed:</b>                            | Lending: January 1, 2017, through December 31, 2019<br>CD: October 3, 2017, through December 31, 2019 |                                 |
| <b>Bank Products Reviewed:</b>                          | Home mortgage and small business lending, CD loans,<br>Community development investments and services |                                 |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>   | <b>Products Reviewed</b>        |
| NA  | NA  | NA                              |
| <b>List of Assessment Areas and Type of Examination</b> |   |                                 |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>   | <b>Other Information</b>        |
| <b>MMSA(s)</b>  |   |                                 |
| NA  |   |                                 |
| <b>State</b>  |   |                                 |
| Kansas  |   | Sedgwick and Johnson Counties   |
| Oklahoma  |   | Cleveland and Oklahoma Counties |

## Appendix B: Summary of MMSA and State Ratings

---

| RATINGS FIDELITY BANK |                      |                        |                     |                                      |
|-----------------------|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank:         | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| Satisfactory          | High Satisfactory    | Low Satisfactory       | High Satisfactory   | Satisfactory                         |
| MMSA or State:        |                      |                        |                     |                                      |
| State of Kansas       | High Satisfactory    | Low Satisfactory       | High Satisfactory   | Satisfactory                         |
| State of Oklahoma     | Low Satisfactory     | High Satisfactory      | High Satisfactory   | Satisfactory                         |

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



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with

the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

State of Kansas

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography  |                           |                |              |                |                                   |              |            |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              | 2017-2019  |  |  |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|--|--|
| Assessment Area:  | Total Home Mortgage Loans |                |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |            | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |  |  |
|   | #                         | \$             | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |  |  |
| Johnson County KS AA  | 610                       | 166,578        | 20.0         | 28,189         | 0.3                               | 0.0          | 0.3        | 4.5                               | 3.3          | 4.0        | 31.3                              | 29.7         | 28.9        | 63.9                              | 67.0         | 66.9        | 0.0                               | 0.0          | 0.0        |  |  |
| Sedgwick County KS AA   | 2,447                     | 418,911        | 80.0         | 16,152         | 5.8                               | 2.9          | 3.2        | 19.6                              | 11.3         | 15.9       | 29.0                              | 29.4         | 28.0        | 45.6                              | 56.4         | 52.9        | 0.0                               | 0.0          | 0.0        |  |  |
| <b>Total</b>  | <b>3,057</b>              | <b>585,489</b> | <b>100.0</b> | <b>44,341</b>  | <b>2.7</b>                        | <b>2.4</b>   | <b>1.3</b> | <b>11.2</b>                       | <b>9.7</b>   | <b>8.3</b> | <b>30.3</b>                       | <b>29.5</b>  | <b>28.5</b> | <b>55.8</b>                       | <b>58.5</b>  | <b>61.8</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |  |  |
| <p><i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.</i></p> <p><i>Due to rounding, totals may not equal 100.0%</i></p> <p><i>FIDELITY BANK (10000706081) excluded from Aggregate</i></p> |                           |                |              |                |                                   |              |            |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |            |  |  |

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2017-2019**

| Assessment Area:      | Total Home Mortgage Loans |                |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|-----------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
|                       | #                         | \$             | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Johnson County KS AA  | 610                       | 166,578        | 20.0         | 28,189         | 12.0                 | 3.0          | 3.9        | 13.6                      | 14.6         | 13.8        | 19.0                    | 20.2         | 21.3        | 55.3                   | 60.8         | 50.0        | 0.0                            | 1.5          | 11.1        |
| Sedgwick County KS AA | 2,447                     | 418,911        | 80.0         | 16,152         | 21.7                 | 7.6          | 7.2        | 17.7                      | 21.8         | 18.2        | 20.9                    | 24.2         | 21.1        | 39.8                   | 40.9         | 33.1        | 0.0                            | 5.6          | 20.3        |
| <b>Total</b>          | <b>3,057</b>              | <b>585,489</b> | <b>100.0</b> | <b>44,341</b>  | <b>16.4</b>          | <b>6.7</b>   | <b>5.1</b> | <b>15.5</b>               | <b>20.3</b>  | <b>15.4</b> | <b>19.9</b>             | <b>23.4</b>  | <b>21.2</b> | <b>48.3</b>            | <b>44.8</b>  | <b>43.9</b> | <b>0.0</b>                     | <b>4.8</b>   | <b>14.5</b> |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2019**

| Assessment Area:      | Total Loans to Small Businesses |                |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|-----------------------|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
|                       | #                               | \$             | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Johnson County KS AA  | 46                              | 13,955         | 5.4          | 14,676         | 1.2               | 0.0          | 0.9        | 7.1                    | 17.4         | 7.9         | 26.9                 | 6.5          | 25.0        | 61.6                | 73.9         | 61.6        | 3.2                         | 2.2          | 4.6        |
| Sedgwick County KS AA | 799                             | 125,004        | 94.6         | 7,393          | 6.2               | 6.9          | 7.8        | 28.2                   | 17.6         | 25.7        | 27.0                 | 50.6         | 31.0        | 38.6                | 24.9         | 34.4        | 0.0                         | 0.0          | 1.0        |
| <b>Total</b>          | <b>845</b>                      | <b>138,959</b> | <b>100.0</b> | <b>22,069</b>  | <b>3.0</b>        | <b>6.5</b>   | <b>3.2</b> | <b>14.8</b>            | <b>17.6</b>  | <b>13.8</b> | <b>26.9</b>          | <b>48.2</b>  | <b>27.0</b> | <b>53.2</b>         | <b>27.6</b>  | <b>52.7</b> | <b>2.0</b>                  | <b>0.1</b>   | <b>3.4</b> |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-2019**

| Assessment Area:      | Total Loans to Small Businesses |                |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|-----------------------|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
|                       | #                               | \$             | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| Johnson County KS AA  | 46                              | 13,955         | 5.4          | 14,676         | 83.1                            | 41.3         | 43.2        | 6.4                            | 34.8         | 10.5                                   | 23.9         |
| Sedgwick County KS AA | 799                             | 125,004        | 94.6         | 7,393          | 80.2                            | 13.9         | 41.8        | 7.4                            | 79.2         | 12.4                                   | 6.9          |
| <b>Total</b>          | <b>845</b>                      | <b>138,959</b> | <b>100.0</b> | <b>22,069</b>  | <b>82.1</b>                     | <b>15.4</b>  | <b>42.7</b> | <b>6.8</b>                     | <b>76.8</b>  | <b>11.2</b>                            | <b>7.8</b>   |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate



State of Oklahoma – Period 1

| Assessment Area:                 | Total Home Mortgage Loans |                |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|----------------------------------|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
|                                  | #                         | \$             | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |
| Oklahoma AA (Cleveland-Oklahoma) | 275                       | 113,203        | 100.0        | 34,038         | 4.4                               | 2.9          | 2.6        | 21.2                              | 21.1         | 16.3        | 37.3                              | 30.9         | 34.1        | 36.9                              | 44.7         | 46.8        | 0.1                               | 0.4          | 0.2        |
| <b>Total</b>                     | <b>275</b>                | <b>113,203</b> | <b>100.0</b> | <b>34,038</b>  | <b>4.4</b>                        | <b>2.9</b>   | <b>2.6</b> | <b>21.2</b>                       | <b>21.1</b>  | <b>16.3</b> | <b>37.3</b>                       | <b>30.9</b>  | <b>34.1</b> | <b>36.9</b>                       | <b>44.7</b>  | <b>46.8</b> | <b>0.1</b>                        | <b>0.4</b>   | <b>0.2</b> |

*Source: 2015 ACS Census; 01/01/2017 - 03/15/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*FIDELITY BANK (10000706081) excluded from Aggregate*

| Assessment Area:                 | Total Home Mortgage Loans |                |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|----------------------------------|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
|                                  | #                         | \$             | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Oklahoma AA (Cleveland-Oklahoma) | 275                       | 113,203        | 100.0        | 34,038         | 22.7                 | 5.8          | 6.7        | 17.3                      | 14.9         | 17.1        | 19.9                    | 13.8         | 18.2        | 40.1                   | 37.1         | 33.7        | 0.0                            | 28.4         | 24.3        |
| <b>Total</b>                     | <b>275</b>                | <b>113,203</b> | <b>100.0</b> | <b>34,038</b>  | <b>22.7</b>          | <b>5.8</b>   | <b>6.7</b> | <b>17.3</b>               | <b>14.9</b>  | <b>17.1</b> | <b>19.9</b>             | <b>13.8</b>  | <b>18.2</b> | <b>40.1</b>            | <b>37.1</b>  | <b>33.7</b> | <b>0.0</b>                     | <b>28.4</b>  | <b>24.3</b> |

*Source: 2015 ACS Census; 01/01/2017 - 03/15/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*FIDELITY BANK (10000706081) excluded from Aggregate*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2019**

| Assessment Area:                 | Total Loans to Small Businesses |               |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|----------------------------------|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
|                                  | #                               | \$            | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Oklahoma AA (Cleveland-Oklahoma) | 161                             | 38,885        | 100.0        | 17,791         | 4.9               | 5.6          | 5.5        | 23.4                   | 18.6         | 22.1        | 32.4                 | 27.3         | 31.1        | 35.7                | 46.0         | 37.4        | 3.5                         | 2.5          | 4.0        |
| <b>Total</b>                     | <b>161</b>                      | <b>38,885</b> | <b>100.0</b> | <b>17,791</b>  | <b>4.9</b>        | <b>5.6</b>   | <b>5.5</b> | <b>23.4</b>            | <b>18.6</b>  | <b>22.1</b> | <b>32.4</b>          | <b>27.3</b>  | <b>31.1</b> | <b>35.7</b>         | <b>46.0</b>  | <b>37.4</b> | <b>3.5</b>                  | <b>2.5</b>   | <b>4.0</b> |

Source: 2019 D&B Data; 01/01/2017 - 03/15/2019 Bank Data; 2018 CRA Aggregate Data "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-2019**

| Assessment Area:                 | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|----------------------------------|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
|                                  | #                               | \$            | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| Oklahoma AA (Cleveland-Oklahoma) | 161                             | 38,885        | 100.0        | 17,791         | 86.7                            | 48.4         | 45.6        | 4.5                            | 37.9         | 8.8                                    | 13.7         |
| <b>Total</b>                     | <b>161</b>                      | <b>38,885</b> | <b>100.0</b> | <b>17,791</b>  | <b>86.7</b>                     | <b>48.4</b>  | <b>45.6</b> | <b>4.5</b>                     | <b>37.9</b>  | <b>8.8</b>                             | <b>13.7</b>  |

Source: 2019 D&B Data; 01/01/2017 - 03/15/2019 Bank Data; 2018 CRA Aggregate Data "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

State of Oklahoma – Period 2

| <b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b> |                           |               |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              |            | <b>2019</b> |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|-------------|
| Assessment Area:  | Total Home Mortgage Loans |               |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |             |
|   | #                         | \$            | % of Total   | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate   | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate  |             |
| Oklahoma AA (Oklahoma County)   | 79                        | 17,885        | 100.0        | 24,498         | 6.1                               | 0.0          | 3.6        | 25.8                              | 19.0         | 19.1        | 32.5                              | 30.4         | 30.5        | 35.4                              | 50.6         | 46.5        | 0.1                               | 0.0          | 0.2        |             |
| <b>Total</b>  | <b>79</b>                 | <b>17,885</b> | <b>100.0</b> | <b>24,498</b>  | <b>6.1</b>                        | <b>0.0</b>   | <b>3.6</b> | <b>25.8</b>                       | <b>19.0</b>  | <b>19.1</b> | <b>32.5</b>                       | <b>30.4</b>  | <b>30.5</b> | <b>35.4</b>                       | <b>50.6</b>  | <b>46.5</b> | <b>0.1</b>                        | <b>0.0</b>   | <b>0.2</b> |             |

Source: 2015 ACS Census; 03/16/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |                           |               |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              |             | <b>2019</b> |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|-------------|
| Assessment Area:   | Total Home Mortgage Loans |               |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |             |
|  | #                         | \$            | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |             |
| Oklahoma AA (Oklahoma County)  | 79                        | 17,885        | 100.0        | 24,498         | 24.7                 | 6.3          | 7.0        | 17.9                      | 20.3         | 16.7        | 19.1                    | 21.5         | 17.1        | 38.3                   | 44.3         | 34.3        | 0.0                            | 7.6          | 25.0        |             |
| <b>Total</b>   | <b>79</b>                 | <b>17,885</b> | <b>100.0</b> | <b>24,498</b>  | <b>24.7</b>          | <b>6.3</b>   | <b>7.0</b> | <b>17.9</b>               | <b>20.3</b>  | <b>16.7</b> | <b>19.1</b>             | <b>21.5</b>  | <b>17.1</b> | <b>38.3</b>            | <b>44.3</b>  | <b>34.3</b> | <b>0.0</b>                     | <b>7.6</b>   | <b>25.0</b> |             |

Source: 2015 ACS Census; 03/16/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2019**

| Assessment Area:              | Total Loans to Small Businesses |               |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |            |
|-------------------------------|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
|                               | #                               | \$            | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate  |
| Oklahoma AA (Oklahoma County) | 46                              | 12,402        | 100.0        | 14,143         | 6.2               | 10.9         | 6.9        | 25.6                   | 17.4         | 24.5        | 30.1                 | 30.4         | 29.3        | 33.8                | 41.3         | 34.4        | 4.4                         | 0.0          | 4.8        |
| <b>Total</b>                  | <b>46</b>                       | <b>12,402</b> | <b>100.0</b> | <b>14,143</b>  | <b>6.2</b>        | <b>10.9</b>  | <b>6.9</b> | <b>25.6</b>            | <b>17.4</b>  | <b>24.5</b> | <b>30.1</b>          | <b>30.4</b>  | <b>29.3</b> | <b>33.8</b>         | <b>41.3</b>  | <b>34.4</b> | <b>4.4</b>                  | <b>0.0</b>   | <b>4.8</b> |

Source: 2019 D&B Data; 03/16/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2019**

| Assessment Area:              | Total Loans to Small Businesses |               |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |
|-------------------------------|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
|                               | #                               | \$            | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |
| Oklahoma AA (Oklahoma County) | 46                              | 12,402        | 100.0        | 14,143         | 86.1                            | 28.3         | 44.4        | 4.8                            | 34.8         | 9.1                                    | 37.0         |
| <b>Total</b>                  | <b>46</b>                       | <b>12,402</b> | <b>100.0</b> | <b>14,143</b>  | <b>86.1</b>                     | <b>28.3</b>  | <b>44.4</b> | <b>4.8</b>                     | <b>34.8</b>  | <b>9.1</b>                             | <b>37.0</b>  |

Source: 2019 D&B Data; 03/16/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

FIDELITY BANK (10000706081) excluded from Aggregate