

# BANK360

## Community Reinvestment Act (CRA)

### Public File

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# **PUBLIC DISCLOSURE**

October 21, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

BANK360  
Certificate Number: 9875

808 N Glenn L English Street  
Cordell, Oklahoma 73632

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

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

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

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## INSTITUTION RATING

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

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

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

## DESCRIPTION OF INSTITUTION

BANK360 (previously known as Bank of Cordell) maintains its headquarters in Cordell, Oklahoma. Rocky Financial Corporation, a one-bank holding company also located in Cordell, wholly owns the bank. Rocky Financial Corporation is wholly owned by the Beaver Creek Trust, which also owns Falcon Corporation, Inc., and Hydro Bancshares, Inc. Falcon Corporation, Inc. wholly owns First Bank and Trust of Memphis (Memphis, Texas). Hydro Bancshares, Inc. wholly owns Bank of Hydro (Hydro, Oklahoma). However, this evaluation does not include a review of any affiliate lending activity. The bank received a "Satisfactory" rating at the previous FDIC Performance Evaluation, dated November 13, 2018, based on Small Institution Procedures.

BANK360 operates two full-service offices in western Oklahoma and one loan production office in Tulsa, Oklahoma. On March 7, 2022, the bank opened a new branch located in a middle-income census tract in Clinton, Oklahoma. The bank did not participate in any merger or acquisition activity or close any branches since the prior evaluation.

BANK360 offers a variety of loan products, including home mortgage, commercial, agricultural, and consumer loans, primarily focusing on home mortgage and commercial lending. Deposit products include checking, savings, money market, and certificate of deposit accounts. Alternative delivery systems include internet banking, mobile banking, telephone banking, drive-thru banking, and an ATM. The institution maintains hours typical for the AA and the industry.

As of the June 30, 2024, Reports of Condition and Income, BANK360 reported total assets of \$59.5 million, total loans of \$49.4 million, and total deposits of \$51.9 million. Since the prior evaluation, total assets increased by 33.4 percent, total loans increased by 25.1 percent, and total deposits increased by 35.1 percent. As presented in the following table, home mortgage loans represent the largest category of loans followed by commercial loans.

<b>Loan Portfolio Distribution as of 6/30/2024</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	846	1.7
Secured by Farmland	2,252	4.6
Secured by 1-4 Family Residential Properties	22,511	45.6
Secured by Multifamily (5 or more) Residential Properties	1,435	2.9
Secured by Nonfarm Nonresidential Properties	17,401	35.2
<b>Total Real Estate Loans</b>	<b>44,445</b>	<b>90.0</b>
Commercial and Industrial Loans	2,910	5.9
Agricultural Production and Other Loans to Farmers	1,421	2.9
Consumer Loans	618	1.2
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>49,394</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0.</i>		

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

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more AAs for which examiners will evaluate its CRA performance. BANK360 designated one AA located in the Oklahoma Non-Metropolitan Statistical Area (MSA) consisting of all of Custer, Kiowa, and Washita counties. The AA conforms to technical CRA regulatory requirements. Due to changes resulting from the 2020 U.S. Census Data, the number of census tracts in the AA increased by two, and the income designation for one census tract changed from moderate income to middle income during the evaluation period.

### **Economic and Demographic Data**

Based on 2020 U.S. Census Data, BANK360’s Oklahoma Non-MSA AA contains 1 moderate-, 8 middle-, and 5 upper-income census tracts. The following table shows additional demographic and economic characteristics of the area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	7.1	57.1	35.7	0.0
Population by Geography	47,946	0.0	11.5	50.3	38.2	0.0
Housing Units by Geography	23,195	0.0	10.1	55.2	34.7	0.0
Owner-Occupied Units by Geography	12,490	0.0	3.6	53.6	42.9	0.0
Occupied Rental Units by Geography	6,057	0.0	24.8	45.4	29.8	0.0
Vacant Units by Geography	4,648	0.0	8.3	72.4	19.3	0.0
Businesses by Geography	5,995	0.0	9.7	50.5	39.8	0.0
Farms by Geography	523	0.0	5.4	62.9	31.7	0.0
Family Distribution by Income Level	12,052	20.5	13.9	20.4	45.1	0.0
Household Distribution by Income Level	18,547	24.9	14.6	15.3	45.2	0.0
Median Family Income – OK Non-MSA	\$58,565		Median Housing Value			\$111,535
			Median Gross Rent			\$688
			Families Below Poverty Level			11.7%

*Source: 2020 U.S. Census Data and 2023 D&B Data. Due to rounding, totals may not equal 100.0.  
 (\*) The NA category consists of geographies that have not been assigned an income classification.*

According to the community contact, major employers in the AA include Bar S Foods Company, Hills Pet Nutrition, and Weatherford Independent School District. The following table shows the annual unemployment rate for the AA, State of Oklahoma, and nationwide. The data reflects a decreasing trend in all areas since the spike in 2020 due to the nationwide COVID-19 pandemic.

Unemployment Rates						
Area	2018	2019	2020	2021	2022	2023
	%	%	%	%	%	%
Custer County	2.4	2.4	5.5	3.4	2.7	2.8
Kiowa County	4.0	3.6	5.2	3.5	3.3	3.6
Washita County	2.9	3.2	6.9	4.5	3.1	3.1
State of Oklahoma	3.3	3.1	6.3	4.0	3.1	3.2
National Average	3.9	3.7	8.1	5.3	3.6	3.6

*Source: Bureau of Labor Statistics.*

Examiners used the applicable FFIEC-updated median family income levels to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle-, and upper-income ranges based on 2023 FFIEC-updated median family income of \$68,700 for the Oklahoma Non-MSA.

<b>Median Family Income Ranges – Oklahoma Non-MSA</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2023 (\$68,700)	<\$34,350	\$34,350 to <\$54,960	\$54,960 to <\$82,440	≥\$82,440
<i>Source: FFIEC.</i>				

### **Competition**

The AA reflects a good level of competition for financial services, based on its population. According to the FDIC Deposit Market Share data as of June 30, 2024, 21 financial institutions operate 36 branches within the AA. Of these institutions BANK360 ranked 11<sup>th</sup> with 3.4 percent deposit market share.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community needs. This information helps determine local financial institutions’ responsiveness to these needs and shows available credit and community development opportunities.

Examiners conducted a community contact with a member from an economic development organization serving the AA. The contact indicated the local economy remains stable; however, the contact noted there is a shortage of affordable housing stock, and a need exists for housing developers in the area. The contact stated housing and small business lending represent the primary credit needs of the community. In addition, the contact stated that local banks remain involved in the community and appropriately serve the credit needs.

### **Credit Needs**

Considering the information from bank management, the community contact, as well as demographic and economic data, examiners determined that home mortgage and small business lending represent the primary credit needs for the AA.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated November 13, 2018, to the current evaluation dated October 21, 2024. To evaluate performance, examiners applied Small Institution Procedures, which include the Lending Test. The appendix lists the test’s criteria.

### **Activities Reviewed**

For the Lending Test, CRA Small Institution Procedures require examiners to determine the bank’s major product lines for review. Examiners may select from among the same loan categories used for Large Bank CRA evaluations: home mortgage, small business, small farm, and consumer loans. The following table details BANK360’s lending activity for 2023.

<b>Loans Originated or Purchased</b>				
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Construction and Land Development	4,230	17.1	4	2.9
Secured by Farmland	2,255	9.1	4	2.9
Secured by 1-4 Family Residential Properties	11,765	47.7	58	42.7
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	3,409	13.8	10	7.4
Commercial and Industrial Loans	1,056	4.3	20	14.7
Agricultural Loans	1,422	5.8	8	5.9
Consumer Loans	552	2.2	32	23.5
Other Loans	0	0.0	0	0.0
<b>Total Loans</b>	<b>24,689</b>	<b>100.0</b>	<b>136</b>	<b>100.0</b>
<i>Source: 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>				

Considering the dollar volume and number of loans originated or purchased during 2023 as well as management’s stated business strategy, examiners determined the bank’s major product lines consist of home mortgage and commercial loans. Agricultural and consumer loans do not reflect major product lines; therefore, this evaluation does not include a review of small farm or consumer loans as they would not materially affect any conclusions or the rating.

For the Lending Test, examiners reviewed the entire universe of 58 home mortgage loans totaling \$11.8 million and 29 small business loans totaling \$2.9 million originated or purchased between January 1, 2023, and December 31, 2023 . Examiners compared the bank’s home mortgage lending to 2020 U.S. Census Data and small business lending to 2023 D&B Data.

Examiners considered the universe by dollar volume and number of loans originated as well as management’s stated business strategy to determine the loan product weighting when arriving at overall conclusions. The following table shows that home mortgage loans represent more than a majority by both number and dollar volume of the loan categories reviewed. Therefore, home mortgage loans received notably more weight when arriving at a conclusion for the assessment area concentration criterion.

<b>Loan Products Reviewed</b>				
<b>Loan Category</b>	<b>Universe</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Mortgage	58	66.7	11,770	80.3
Small Business	29	33.3	2,895	19.7
<b>Total Loans</b>	<b>87</b>	<b>100.0</b>	<b>14,665</b>	<b>100.0</b>
<i>Source: 2023 Bank Data.</i>				

However, the assessment area concentration analysis revealed a majority of home mortgage loans were originated outside the assessment area. As a result, the volume of home mortgage and small business loans originated in the assessment area were similar; therefore, examiners placed only

slightly more weight on home mortgage loans when arriving at conclusions for geographic distribution and borrower profile.

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

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

BANK360 demonstrated satisfactory performance regarding the Lending Test. A more than reasonable LTD ratio and reasonable records regarding geographic distribution and borrower profile support this conclusion. Although the bank originated a majority of loans outside the AA, it did not adversely affect the overall rating.

#### **Loan-to-Deposit Ratio**

BANK360’s LTD ratio is more than reasonable (considering seasonal variations and taking into account lending-related activities) given the institution’s size, financial condition, and AA’s credit needs. The LTD ratio, calculated from Reports of Condition and Income data, averaged 101.4 percent over the past 23 quarters, from December 31, 2018, to June 30, 2024, representing a slight decrease from the 106.5 percent average LTD at the prior evaluation. The ratio ranged from a high of 117.3 percent on December 31, 2018, to a low of 86.7 percent as of March 31, 2021.

Examiners identified and listed in the following table three comparable institutions operating in the AA with similar asset sizes and lending emphases. As illustrated, BANK360 reported the highest average net LTD ratio compared to the similar institutions.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 6/30/2024 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>BANK360, Cordell, Oklahoma</b>	<b>59,501</b>	<b>101.4</b>
Washita State Bank, Burns Flat, Oklahoma	53,158	66.6
First Bank and Trust Company, Clinton, Oklahoma	56,799	45.4
Southwest Bank of Weatherford, Weatherford, Oklahoma	77,459	60.9
<i>Source: Reports of Condition and Income 12/31/2018 - 6/30/2024.</i>		

#### **Assessment Area Concentration**

A majority of loans are outside of the institution’s AA. A majority of home mortgage loans, by number and dollar, originated outside of the AA outweighs a substantial majority of small business loans, by number and dollar, originated inside the AA to support this conclusion.

The bank’s business strategy supports the ability to meet the credit needs within the AA while extending loans outside of the AA, such as into the Oklahoma City area, and examiners considered additional performance context affecting the data. Specifically, BANK360 has a lender based in the

Oklahoma City area, and several of the home mortgage loans originated outside the AA were made to the same two borrowers that operate investments properties in that area. Despite a majority of home mortgage loans originated outside of the AA, examiners determined the bank is still appropriately meeting the credit needs of its AA.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>					<b>Dollar Amount of Loans</b>				
	<b>Inside</b>		<b>Outside</b>		<b>Total</b>	<b>Inside</b>		<b>Outside</b>		<b>Total</b>
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	<b>\$</b>
Home Mortgage	23	39.7	35	60.3	58	2,669	22.7	9,101	77.3	11,770
Small Business	27	93.1	2	6.9	29	2,680	92.6	215	7.4	2,895

*Source: 2023 Bank Data. Due to rounding, totals may not equal 100.0.*

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Reasonable performance regarding home mortgage loans outweighs poor performance regarding small business loans to support this conclusion. Since the AA does not include any low-income census tracts, examiners focused on the percentage by number of loans in moderate-income census tracts within the AA when arriving at conclusions.

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

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. The following table shows that although BANK360 did not originate any home mortgage loans in moderate-income census tracts, this only falls slightly below demographic data by 3.6 percentage points, reflecting reasonable performance.

<b>Geographic Distribution of Home Mortgage Loans</b>					
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	3.6	0	0.0	0	0.0
Middle	53.6	5	21.7	384	14.4
Upper	42.9	18	78.3	2,285	85.6
Not Available	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>2,669</b>	<b>100.0</b>

*Source: 2020 U.S. Census Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.*

***Small Business Loans***

The geographic distribution of small business loans reflects poor dispersion throughout the AA. The following table shows the bank’s lack of lending in moderate-income census tracts falls below demographic data by 9.7 percentage points, representative of poor performance.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	0.0	0	0.0	0	0.0
Moderate	9.7	0	0.0	0	0.0
Middle	50.5	11	40.7	1,450	54.1
Upper	39.8	16	59.3	1,230	45.9
Not Available	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>2,680</b>	<b>100.0</b>

*Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.*

**Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. A reasonable record regarding home mortgage lending outweighs an excellent record regarding small business lending to support this conclusion. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses with gross annual revenue of \$1 million or less in the AA when arriving at conclusions for this performance factor.

***Home Mortgage Loans***

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels (including low and moderate income). Reasonable performance to moderate-income borrowers outweighs poor performance to low-income borrowers to support this conclusion.

The following table shows the bank’s level of lending to low-income borrowers falls 11.8 percentage points below demographic data, typically reflective of poor performance. However, examiners considered certain performance context data affecting performance, such as 11.7 percent of families in the AA live below the poverty level. In addition, a low-income family in the AA with an income below \$34,350 would not likely qualify for a home mortgage loan under conventional underwriting standards. Therefore, limited opportunities likely exist for lending to low-income families. To moderate-income borrowers, BANK360’s lending reflects similar performance to the demographic data and evidences reasonable performance.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>					
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	20.5	2	8.7	51	1.9
Moderate	13.9	3	13.0	193	7.2
Middle	20.4	4	17.4	705	26.4
Upper	45.1	14	60.9	1,720	64.4
Not Available	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>2,669</b>	<b>100.0</b>

*Source: 2020 U.S. Census Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.*

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

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among businesses of different sizes. Examiners focused on the bank’s level of lending to businesses with gross annual revenue of \$1 million or less when arriving at this conclusion. The following table shows the bank originated all of its small business loans to business with gross annual revenues of \$1 million or less, evidencing excellent performance.

<b>Distribution of Small Business Loans by Gross Annual Revenues</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
< \$100,000	63.9	13	48.1	743	27.7
\$100,000 - \$249,999	16.5	5	18.5	876	32.7
\$250,000 - \$499,999	4.7	8	29.6	911	34.0
\$500,000 - \$1,000,000	2.0	1	3.7	150	5.6
<b>Subtotal &lt;= \$1,000,000</b>	<b>87.1</b>	<b>27</b>	<b>100.0</b>	<b>2,680</b>	<b>100.0</b>
>\$1,000,000	2.9	0	0.0	0	0.0
Revenue Not Available	10.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>2,680</b>	<b>100.0</b>

*Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.*

### **Response to Complaints**

BANK360 did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

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

## APPENDICES

### SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

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

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

## GLOSSARY

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

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

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

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

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

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

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

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

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

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

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

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

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

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

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

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

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

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

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

# BANK360

## Community Reinvestment Act (CRA)

Public File

Written comments received from the public:

<b>Year</b>	<b>Description</b>
1998	None received
1999	None received
2000	None received
2001	None received
2002	None received
2003	None received
2004	None received
2005	None received
2006	None received
2007	None received
2008	None received
2009	None received
2010	None received
2011	None received
2012	None received
2013	None received
2014	None received
2015	None received
2016	None received
2017	None received
2018	None received
2019	None received
2020	None received
2021	None received
2022	None received
2023	None received
2024	None received
2025	None received

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## Community Reinvestment Act (CRA)

Public File

### Banking Locations

#### Main Bank

BANK360  
808 North Glenn English  
PO Box 440  
Cordell, OK 73632

Phone 580.832.5600  
Fax 580.832.5605

#### Branch Bank

BANK360  
1002 Frisco Ave  
Clinton, OK 73601

Phone 580.323.3000

#### Loan Production Office

BANK360  
2448 E 81st Street  
Suite 2052  
Tulsa, OK 74137

Phone 918.512.1755  
Fax 918.382.4141

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## Community Reinvestment Act (CRA)

Public File

Branches opened or closed:

<b>Year</b>	<b>Description</b>
1999	None
2000	None
2001	None
2002	None
2003	Rocky Branch Closed 9-11-03 / due to bldg structural weakness
2004	None
2005	None
2006	None
2007	None
2008	None
2009	None
2010	None
2011	None
2012	None
2013	None
2014	None
2015	None
2016	None
2017	None
2018	None
2019	None
2020	None
2021	None
2022	Open Clinton Branch 3-7-2022 and name changed to BANK360
2023	None
2024	None
2025	None

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## Community Reinvestment Act (CRA)

Public File

Services offered and hours at each location:

### Cordell Location

808 North Glenn English  
Cordell, OK 73632

#### Lobby Hours

Monday - Friday	8:30AM to 3:00PM
Saturday	Closed

#### Drive Thru Hours

Monday - Thursday	8:30AM to 4:00PM
Friday	8:30AM to 6:00PM
Saturday	Closed

#### Services

Checking Accounts - Interest and Non Interest Bearing  
Saving Accounts  
IRA Accounts  
Internet Banking  
Mobile Deposit  
Cashier Checks  
Money Orders  
Wire Transfers  
Loans - Consumer, Commercial, Agriculture, and Real Estate  
Safety Deposit Boxes  
Drive thru banking  
Night Deposit

### Clinton Location

1002 Friscon Ave.  
Clinton, OK 73601

#### Lobby Hours

Monday - Friday	8:30AM to 4:00PM
Saturday	Closed

#### Drive Thru Hours

Monday - Friday	8:30AM to 6:00PM
Saturday	8:30AM to 12:00PM

#### Services

Checking Accounts - Interest and Non Interest Bearing  
Saving Accounts  
IRA Accounts  
Internet Banking  
Mobile Deposit  
Cashier Checks  
Money Orders  
Wire Transfers  
Loans - Consumer, Commercial, Agriculture, and Real Estate  
Safety Deposit Boxes  
Drive thru banking  
Night Deposit  
ATM

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## Community Reinvestment Act (CRA)

Public File

### Loan to Deposit Ratio:

<b>date</b>	<b>loans</b>	<b>deposits</b>	<b>Loan:Deposit</b>
Mar-14	\$ 29,232,224.75	\$ 33,046,609.50	88.46%
Jun-14	\$ 34,522,218.71	\$ 32,269,050.10	106.98%
Sep-14	\$ 35,508,940.14	\$ 32,329,868.86	109.83%
Dec-14	\$ 36,914,045.04	\$ 31,243,356.63	118.15%
Mar-15	\$ 35,636,437.57	\$ 31,032,990.55	114.83%
Jun-15	\$ 35,382,325.83	\$ 30,888,451.26	114.55%
Sep-15	\$ 39,876,163.99	\$ 31,425,171.67	126.89%
Dec-15	\$ 40,760,224.63	\$ 31,796,394.84	128.19%
Mar-16	\$ 42,217,308.93	\$ 34,497,148.66	122.38%
Jun-16	\$ 41,008,551.17	\$ 35,320,194.53	116.11%
Sep-16	\$ 42,082,341.39	\$ 35,699,420.31	117.88%
Dec-16	\$ 43,087,833.44	\$ 34,494,779.68	124.91%
Mar-17	\$ 41,168,912.80	\$ 35,408,939.92	116.27%
Jun-17	\$ 40,633,430.55	\$ 35,071,554.14	115.86%
Sep-17	\$ 39,918,231.60	\$ 32,613,321.84	122.40%
Dec-17	\$ 35,073,367.50	\$ 32,943,468.75	106.47%
Mar-18	\$ 35,744,678.48	\$ 32,315,006.13	110.61%
Jun-18	\$ 33,610,772.24	\$ 35,552,000.10	94.54%
Sep-18	\$ 33,860,569.00	\$ 37,036,760.56	91.42%
Dec-18	\$ 32,817,280.81	\$ 38,771,706.24	84.64%
Mar-19	\$ 33,986,937.88	\$ 37,354,478.04	90.98%
Jun-19	\$ 33,505,123.38	\$ 36,805,569.69	91.03%
Sep-19	\$ 31,737,416.45	\$ 35,499,607.77	89.40%
Dec-19	\$ 32,071,981.47	\$ 34,126,858.57	93.98%
Mar-20	\$ 33,188,641.60	\$ 33,191,431.61	99.99%
Jun-20	\$ 33,711,104.84	\$ 34,946,152.84	96.47%
Sep-20	\$ 35,708,130.13	\$ 33,461,533.77	106.71%
Dec-20	\$ 34,873,138.68	\$ 35,068,213.05	99.44%
Mar-21	\$ 36,518,221.90	\$ 41,670,849.67	87.63%
Jun-21	\$ 34,763,800.23	\$ 38,140,927.01	91.15%
Sep-21	\$ 35,321,501.12	\$ 38,932,308.16	90.73%
Dec-21	\$ 44,807,812.94	\$ 42,118,284.23	106.39%
Mar-22	\$ 42,141,745.03	\$ 41,903,328.39	100.57%
Jun-22	\$ 46,836,241.43	\$ 46,595,401.63	100.52%
Sep-22	\$ 48,677,487.65	\$ 48,013,873.22	101.38%
Dec-22	\$ 48,986,483.97	\$ 47,086,376.41	104.04%
Mar-23	\$ 49,357,732.67	\$ 46,725,406.87	105.63%
Jun-23	\$ 49,174,493.07	\$ 48,136,244.79	102.16%
Sep-23	\$ 49,796,377.23	\$ 48,616,997.20	102.43%
Dec-23	\$ 50,186,197.71	\$ 48,668,825.93	103.12%
Mar-24	\$ 50,068,662.84	\$ 50,301,091.79	99.54%
Jun-24	\$ 49,393,985.87	\$ 51,862,053.42	95.24%
Sep-24	\$ 49,309,110.89	\$ 53,667,378.33	91.88%
Dec-24	\$ 49,199,160.74	\$ 54,697,223.66	89.95%
Mar-25	\$ 48,292,832.02	\$ 55,912,112.82	86.37%
Jun-25	\$ 46,792,800.09	\$ 53,905,061.77	86.81%
Sep-25	\$ 48,263,485.03	\$ 55,060,378.83	87.66%
Dec-25	\$ 51,570,163.64	\$ 55,085,365.70	93.62%

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## Community Reinvestment Act (CRA)

Public File

<b>County</b>	<b>FFIEC Codes</b>
Washita	9649
	9650
	9651
	9654
Custer	9508
	9604
	9606
	9607
	9610
Kiowa	9636
	9637
	9642
Caddo	1616
	1617
	1618
	1619
	1620
	1621
	1622
	1623

# BANK360

## Community Reinvestment Act (CRA)

Branch of Cordell  
1002 W Frisco Ave  
Clinton, OK 73601

Public File

County	FFIEC Codes
Custer	9508
	9604
	9606
	9607
	9610
Washita	9649
	9650
	9651
	9654