



PUBLIC DISCLOSURE

August 22, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Vast Bank, National Association
Charter Number 17174

110 N. Elgin Avenue, Suite 500
Tulsa, Oklahoma 74120

Office of the Comptroller of the Currency

8282 S. Memorial Drive, Suite 300
Tulsa, Oklahoma 74133

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.....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	4
State Rating.....	4
State of Oklahoma	4
Community Development Test	8
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 Outstanding.

The Lending Test is rated: Outstanding.

The Community Development test is rated: Outstanding.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, market focus, competition, and lending opportunities in the assessment area (AA).
- A majority of loans were originated in the bank's AA.
- The bank exhibits an excellent geographic distribution of loans to low- or moderate-income (LMI) census tracts (CTs).
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on an excellent level of CD loans.
- The bank did not receive any complaints related to the Community Reinvestment Act (CRA) during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD is reasonable.

Vast Bank's quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 86.37 percent. Vast Bank's LTD ratio had an average high ratio of 90.07 percent in second quarter 2020. We compared the bank's LTD ratio to four similarly situated banks (peer group banks) in their market area ranging in total asset sizes of \$536 million to \$946 million. The aggregate average LTD ratio for the competing banks was 93.66 percent, with a low average of 86.66 percent and a high average of 97.73 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 80 percent of its total loans inside the bank's AA 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.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	66	75.0	22	25.0	88	45,177	81.3	10,403	18.7	55,580
2020	67	81.7	15	18.3	82	19,413	39.9	29,229	60.1	48,642
2021	49	81.7	11	18.3	60	16,544	56.0	13,000	44.0	29,543
Subtotal	182	79.1	48	20.9	230	81,133	60.6	52,632	39.4	133,765
Small Business 2019 - 2021	21	87.5	3	12.5	24	23,186	77.8	6,585	22.2	29,770
Subtotal	21	87.5	3	12.5	24	23,186	77.8	6,585	22.2	29,770
Total	203	80.0	51	20.0	254	104,319	63.7	59,217	36.3	163,535
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Vast Bank, National Association (Vast Bank or bank) is a single-state financial institution headquartered in Tulsa, Oklahoma. The bank is a subsidiary of Tulsa Valley Bancshares Corporation, a one-bank holding company headquartered at the main bank address. As of December 31, 2021, Vast Bank reported total assets of \$852 million, loans of \$565 million (66.3 percent of total assets), and tier 1 capital of \$93.8 million. The bank's loan portfolio consists of 73.4 percent in commercial loans, 10.7 percent in 1-4 family loans, six percent in construction and land development, five percent in multifamily loans, and 4.9 percent in other loans. The bank's primary focus remains centered in commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community.

The bank has one rating area located in the state of Oklahoma, with one AA comprising all of Tulsa, Rogers, Wagoner, Creek, and Osage Counties. The bank operates five full-service banking centers within the state of Oklahoma. All five branch locations are within the bank's AA, and all are in Tulsa County. Vast Bank's main branch location is in downtown Tulsa. All branch locations offer drive-in banking. The bank offers reasonable branch lobby hours Monday through Friday at all locations, with four locations offering extended hours on Friday or Saturdays. In addition, the bank has four automated teller machines which are all located in Tulsa County.

During the evaluation period, there were no new branch openings and six branch closings. There were five branch closures located in middle-income CTs and one closure located in an upper-income CT. The branch closings occurred in Langley, Collinsville, Owasso, Oologah, Ketchum, and Catoosa, Oklahoma. The bank's 2020 strategic plan notes that exiting these smaller rural markets would provide greater focus on strategic initiatives.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. Vast Bank is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "Satisfactory" at the last CRA evaluation dated August 12, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of Vast Bank's CRA activities in its AAs under the Intermediate Small Bank CRA procedures, which includes the Lending Test and CD Test. The Lending Test evaluates the record of meeting the credit needs of the bank's AAs through bank lending activities. The CD Test evaluates the bank's responsiveness to CD needs and opportunities in its AAs through qualified CD lending, investments and donations, and services.

Conclusions regarding the lending performance are based on samples of commercial small business and 1-4 family residential real estate loans originated for the period January 1, 2019, through December 31, 2021. Conclusions regarding the CD Test are based on the bank's CD activities from the date of the last PE, August 12, 2019, through December 31, 2021.

Data Integrity

We performed a data integrity review in April 2022 prior to the CRA evaluation to assess the reliability of loan data subject to the Home Mortgage Disclosure Act (HMDA) reporting requirements. We verified data reliability by assessing internal policies and procedures. We performed transaction testing of loan data reported on the bank's HMDA Loan Application Records for 2019, 2020, and 2021. Our sample consisted of 230 loans using methodology as detailed in OCC Bulletin 2017-31, "FFIEC HMDA Examiner Transaction Testing Guidelines." We found internal policies and procedures satisfactory and deemed the HMDA data reliable. The bank is not required to and did not collect and report business and consumer loan data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs 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 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 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.

Vast Bank's AA includes the full counties of Tulsa, Rogers, Wagoner, Creek, and Osage; collectively referred to as the Tulsa AA. Vast Bank serves Tulsa County through the main banking location in downtown Tulsa and the other four branch locations throughout Tulsa County. There are no limited scope review areas.

Ratings

The bank's overall rating is based primarily on performance in the AA. As of December 31, 2021, small loans to businesses represented 73.4 percent of total bank loans. For the Lending Test, we analyzed both home mortgage loans and small loans to businesses. We placed greater weight on small loans to businesses based on the percentage of loan activities, which is consistent with Vast Bank's lending strategy.

Vast Bank has only one AA in one state. Ratings are based solely on the results of this AA.

The state rating is based on performance in all bank AAs. Refer to the “Scope” section under each State 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 CFR 25.28(c) 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 by the bank in any geography, or in any AA 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 evaluating 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 (or any affiliate whose loans have been considered as part of the institution’s lending performance) 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 PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

State Rating

State of Oklahoma

CRA rating for the state of Oklahoma: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the AA.
- The distribution of loans to individuals of different income levels and businesses of different sizes is reasonable.
- CD lending reflects excellent responsiveness to the needs of the bank’s AA.
- CD services reflects excellent responsiveness to the needs of the bank’s AA.

Description of Institution's Operations in Oklahoma

Vast Bank has one AA in the state of Oklahoma meeting the definitional requirements of the regulation, and does not arbitrarily exclude LMI geographies.

The bank's AA consists of 257 CTs, including all of Tulsa County, Rogers County, Wagoner County, Creek County, and Osage County. The Tulsa AA consists of 17 low-income CTs, 70 moderate-income CTs, 102 middle-income CTs, and 68 upper-income CTs. The main bank in downtown Tulsa and the four other branch locations are all in Tulsa County.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Vast Bank 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	257	6.6	27.2	39.7	26.5	0.0
Population by Geography	906,731	5.5	24.4	41.0	29.1	0.0
Housing Units by Geography	392,779	5.8	26.1	40.9	27.1	0.0
Owner-Occupied Units by Geography	228,861	2.9	18.8	44.0	34.3	0.0
Occupied Rental Units by Geography	122,504	10.0	36.6	36.4	17.0	0.0
Vacant Units by Geography	41,414	9.5	35.0	37.8	17.7	0.0
Businesses by Geography	93,753	3.1	20.9	39.0	36.9	0.0
Farms by Geography	2,710	2.5	15.3	49.7	32.5	0.0
Family Distribution by Income Level	233,772	21.1	17.5	20.4	41.0	0.0
Household Distribution by Income Level	351,365	23.8	16.3	17.9	42.0	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$135,465
			Median Gross Rent			\$773
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition in the AA is strong with 24 other financial institutions in the area, including large nationwide and regional banks. According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Oklahoma, the bank has \$643 million in deposits with a deposit market share of 1.57 percent. Vast Bank ranks 15th in deposit market share out of 73 banks in the state.

The table above summarize the demographic characteristics of the combined counties that make up the AA. The table shows the demographic characteristics of the AA according to the 2015 American Community Survey (ACS) and 2020 Dunn & Bradstreet (D&B) data. Comparison of the two census periods indicates no significant change in the level of population and number of businesses. Median housing values decreased by 2.1 percent. The percentages of families below the poverty level remains the same at 11.2 percent.

Community Contact

The OCC relied on two community contacts within the AA to gain a better understanding of the general community credit and development needs, as well as local economic conditions. The OCC contacts within the AA included a public housing organization and economic development corporation. Community contacts indicated that the following are identified needs within the bank's AA:

- Affordable housing in LMI areas, to include multi-family projects geared towards LMI families/individuals
- Home mortgage programs for LMI borrowers
- Increased need for small business lending due to COVID-19 related closures
- Financial literacy and education programs targeting LMI areas

The contacts stated that local banks are active and that the CD needs of the area are being met. The bank made CD loans that benefit affordable housing, CD donations to an organization that provides training to Native American individuals in the manufacturing sector and provided CD services to a qualified organization that has programs targeting LMI individuals at or below established poverty levels.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OKLAHOMA

LENDING TEST

The bank's performance under the Lending Test in the state of Oklahoma is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's lending performance in the state of Oklahoma is Outstanding.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the AA.

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.

The geographic distribution of home mortgage reflects excellent distribution.

For 2019-2021, the percentage of bank loans in low-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution in those CTs.

For 2019-2021, the percentage of bank loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units and exceeds the aggregate distribution in those CTs.

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 business loans to businesses reflects excellent distribution.

For low-income geographies, the bank's lending exceeds both the percentage of small businesses located in low-income geographies and the aggregate lending to small businesses in low-income geographies.

For moderate-income geographies, the bank's lending exceeds both the percentage of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

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.

During the evaluation period the distribution of home mortgage loans to LMI families is adequate.

The distribution of home mortgage loans by the income level of low-income borrowers in the AA is adequate. The percentage of bank loans to low-income borrowers was lower than the percent of low-income families and somewhat lower than the aggregate bank peer performance.

The distribution of home mortgage loans by the income level of moderate-income borrowers in the AA is poor. The percentage of bank loans to moderate-income borrowers was lower than both the percent of moderate-income families and the aggregate bank peer performance.

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 originations and purchases of small loans to businesses.

During the evaluation period, the bank's distribution of small loans to businesses by revenue is good. The bank's percentage of loans to small businesses with revenues less than \$1 million was somewhat lower than the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses.

Responses to Complaints

Vast Bank received no CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the AA is rated Outstanding.

Based on a full scope the review, the bank exhibits excellent responsiveness to CD needs in the AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The CD Loans table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Tulsa MSA	22	100%	\$63,185	100%

The bank made an excellent level of CD loans in the AA. During the evaluation period, the bank originated 22 loans totaling \$63.1 million. The bank effectively helped meet community credit needs by supporting community services to LMI individuals and affordable housing, as well as revitalization and stabilization as part of various city plans. The volume of CD lending in this AA was equivalent to 67.3 percent of the allocated tier 1 capital.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Tulsa AA	0	0	30	4,550	30	100	4,550	100	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.

The Qualified Investments table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments and donations, including prior period investments that remain outstanding as of the examination date. The volume of CD investments made during the evaluation period in the AA was adequate. The bank's qualified investments consisted of \$4.4 million in investments and \$138,546 in donations. Investments benefiting the AA during the evaluation period represented 4.8 percent of allocated tier 1 capital. There were no prior period or unfunded commitments during the evaluation period.

The bank's investments of \$4.41 million consisted of one multifamily affordable housing bond totaling \$1.25 million and two Fannie Mae mortgage-backed securities totaling \$3.16 million.

Examples of the donations include:

- \$20,000 to a non-profit organization with a mission to serve those who are experiencing or at risk for homelessness. Through its work, the organization treats both the symptoms and the causes of homelessness, pursuing a future where every Tulsan has a home.
- \$10,000 to a non-profit organization whose work includes housing, mental health education, support groups, pro bono counseling, mental health screening and referral, suicide prevention, peer-to-peer recovery services, employment readiness, community health and wellness initiatives, and criminal justice advocacy. The housing program utilizes a Housing First model that provides immediate access to safe, decent, and affordable housing for individuals who have experienced mental illness, homelessness, and substance use.
- \$10,000 to an organization which helps bolster, train and retain jobs in the manufacturing sector. This organization also focuses on specific development with Native nations and working directly with governments helping build a more robust Native American workforce.

Extent to Which the Bank Provides Community Development Services

Bank officers and employees provided a total of 1,816 hours of service with a majority providing community services that benefit LMI individuals, which is considered excellent performance. Officers and employees held leadership positions as directors, chairpersons, treasurer, or through board memberships. Those organizations and non-profits provided services to address homelessness, free food distribution to LMI communities, and programs targeting LMI individuals at or below established poverty levels. Other officers and employees provided financial assistance and expertise to organizations that target services to LMI individuals.

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 MSA(s) and non-MSA(s) 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.”

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business CD loans, qualified investments and donations, CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
Tulsa MSA	Full-Scope	Tulsa, Rogers, Wagoner, Creek, and Osage Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS - Vast Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank Rating
Vast Bank	Outstanding	Outstanding	Outstanding
State:			
Oklahoma	Outstanding	Outstanding	Outstanding

(*) The Lending Test and CD Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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.

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 are treated 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 30th 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-2021		
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			
Tulsa AA	182	81,133	100.0	42,415	2.9	3.3	0.7	18.8	14.8	11.3	44.0	32.4	40.3	34.3	49.5	47.7	0.0	0.0	0.0			
Total	182	81,133	100.0	42,415	2.9	3.3	0.7	18.8	14.8	11.3	44.0	32.4	40.3	34.3	49.5	47.7	0.0	0.0	0.0			

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-2021		
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			
Vast Bk 2019-2021	182	81,133	100.0	42,415	21.1	2.2	4.0	17.5	3.8	14.8	20.4	8.2	18.4	41.0	47.8	41.1	0.0	37.9	21.8			
Total	182	81,133	100.0	42,415	21.1	2.2	4.0	17.5	3.8	14.8	20.4	8.2	18.4	41.0	47.8	41.1	0.0	37.9	21.8			

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2021		
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		
Vast Bk 2019-2021	21	\$23,186	100	19,036	3.1	9.5	2.4	20.9	33.3	20.5	39.0	42.9	41.4	36.9	14.3	35.6	0.0	--	0.0		
Total	21	\$23,186	100	19,036	3.1	9.5	2.4	20.9	33.3	20.5	39.0	42.9	41.4	36.9	14.3	35.6	0.0	--	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-2021	
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		
Vast Bank 2019-2021	21	23,186	100	19,036	87.3	47.6	33.4	4.5	52.4	8.2	--		
Total	21	23,186	100	19,036	87.3	47.6	33.4	4.5	52.4	8.2	--		

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*