



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.

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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. 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.

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	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 Kansas¹: 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.

¹ 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 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&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 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)
Full-Scope:										
Sedgwick County AA	0	\$0	23	\$3,325	23	79.4	\$3,325	39.8	0	\$0
Limited-Scope										
Johnson County AA	0	0	3	\$2	3	10.3	\$2	0.0%	0	\$0
Kansas Statewide	3	\$5,029	0	0	3	10.3	\$5,029	60.2	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 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 12th 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)²: 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.

² 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: 1/1/2017 - 3/15/2019 Oklahoma AA (Cleveland-Oklahoma)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
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 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&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>						

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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 3/16/2019 – 12/31/2019 Oklahoma AA (Oklahoma County)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
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 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&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 57th 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 28th 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 12th 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”.

Time Period Reviewed:	Lending: January 1, 2017, through December 31, 2019 CD: October 3, 2017, through December 31, 2019	
Bank Products Reviewed:	Home mortgage and small business lending, CD loans, Community development investments and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
NA		
State		
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 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 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		
Total	3,057	585,489	100.0	44,341	2.7	2.4	1.3	11.2	9.7	8.3	30.3	29.5	28.5	55.8	58.5	61.8	0.0	0.0	0.0		
<i>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%</i>																					
<i>FIDELITY BANK (10000706081) excluded from Aggregate</i>																					

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
Total	3,057	585,489	100.0	44,341	16.4	6.7	5.1	15.5	20.3	15.4	19.9	23.4	21.2	48.3	44.8	43.9	0.0	4.8	14.5

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		
Total	845	138,959	100.0	22,069	3.0	6.5	3.2	14.8	17.6	13.8	26.9	48.2	27.0	53.2	27.6	52.7	2.0	0.1	3.4		

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		
Total	845	138,959	100.0	22,069	82.1	15.4	42.7	6.8	76.8	11.2	7.8		

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
Total	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

*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
Total	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

*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
Total	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

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
Total	161	38,885	100.0	17,791	86.7	48.4	45.6	4.5	37.9	8.8	13.7

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				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	
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	
Total	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	

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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				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	
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	
Total	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	

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
Total	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

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
Total	46	12,402	100.0	14,143	86.1	28.3	44.4	4.8	34.8	9.1	37.0

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