

Corporate Decision #1354
January 2026

December 15, 2025

Christopher Kincaid
Chief Administrative Officer
Extraco Banks, National Association
1700 North Valley Mills Drive
Waco, Texas, 76710

Re: Operating Subsidiary Application
Extraco Banks, National Association, Temple, Texas
OCC Charter Number: 13778
OCC Control Number: 2025-Subs&Equities-342937

Dear Mr. Kincaid:

The Office of the Comptroller of the Currency (OCC) hereby approves the August 12, 2025 operating subsidiary application filed by Extraco Banks, National Association, Temple, Texas (Bank) to acquire Extraco Consulting Corporation (Subsidiary). The Subsidiary will be wholly owned by the Bank.¹ The Subsidiary currently provides a wide range of advisory services to affiliates, banks, savings associations, credit unions, and financial technology companies that provide services to financial institutions. The Bank proposes to offer through Subsidiary certain advisory services to financial institutions and affiliates, including marketing, website development, human resources guidance, organizational structure guidance, process improvement, training, call center set-up and training, strategic planning, product reviews, online training systems, financial software implementation, bank equipment sales and installation, branch furniture and fixtures procurement, branch lobby design, and Bank Secrecy Act/Anti-Money Laundering services. In addition to the services offered to financial institutions and affiliates, the Bank proposes to offer through Subsidiary services to financial technology companies that exclusively provide services to financial institutions, including marketing, financial website development, and online training systems.

Subsidiary qualifies as an operating subsidiary as the requirements set forth in 12 CFR 5.34(e)(2) will be met.

A national bank “may conduct in an operating subsidiary activities that are permissible for a national bank to engage in directly either as part of, or incidental to, the business of banking, as determined by the OCC, or otherwise under statutory authority.” 12 CFR 5.34(e). Based on a thorough review of all information available, including the representations and commitments made in the application and by the Bank’s representatives, the OCC concludes that the majority

¹ The application notes the Bank will purchase 100 percent of the stock of Subsidiary from Extraco Capital LLC, a Bank affiliate.

of Subsidiary's proposed activities are legally permissible for national banks and their operating subsidiaries. Most of the proposed activities fit within the OCC's existing precedent regarding correspondent services, codified in 12 CFR 7.5007, which provides that it is part of the business of banking for national banks and their operating subsidiaries to provide "any service it may perform for itself" to financial institution customers. While the OCC has not previously addressed the permissibility of providing services to financial technology companies under this authority, the application represents that the companies themselves will exclusively provide services to financial institutions. Accordingly, the present case involves a bank indirectly providing correspondent services that it would otherwise be permitted to provide directly. The provision of such services in this way is permissible for a national bank.

However, with respect to the Bank's request for the Subsidiary to engage in branch furniture and fixtures procurement and branch lobby design (collectively, "design activities"), the OCC has concluded that these design activities are not part of, or incidental to, the business of banking under the facts and circumstances set forth in the application. Specifically, the design activities lack the requisite nexus to traditional banking activities to qualify as a correspondent service and here there is an insufficient connection to the remainder of the Subsidiary's services for the design activities to qualify as an incidental activity.² Accordingly, the Subsidiary is not permitted to engage in these design activities under these circumstances.

If the operating subsidiary is not established or acquired or the new activity commenced in an existing subsidiary within 12 months from the date of this letter, the approval automatically terminates unless the OCC grants an extension.

This approval and the activities and communications by OCC employees in connection with the filing do not constitute a contract, express or implied, or any other obligation binding upon the OCC, the United States, any agency or entity of the United States, or any officer or employee of the United States, and do not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable law and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the United States.

Our approval is based on the Bank's representations, submissions, and information available to the OCC as of this date. The OCC may modify, suspend, or rescind this approval if a material change in the information on which the OCC relied occurs prior to the date of the transaction to which this decision pertains.

Sincerely,

//signed//

Stephen A. Lybarger
Senior Deputy Comptroller for Chartering, Organization and Structure

² 12 C.F.R. 7.1000(d) and 7.5007.