PUBLIC DISCLOSURE

February 27, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Lipan Charter Number: 10598

> 101 E. Lipan Drive Lipan, TX 76462

Office of the Comptroller of the Currency

225 E. John Carpenter Freeway Suite 900 Irving, TX 75062

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.

Charter Number: 10598

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	5
State of Texas	5
Lending Test	6
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on performance in the bank's only assessment area (AA) within the state of Texas.
- The bank's Loan-to-Deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside the AA.
- The income distribution to individuals of different income levels is excellent.
- There were no Community Reinvestment Act (CRA) related complaints during the evaluation period.

Loan-to-Deposit Ratio

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

The LTD is calculated on a bank-wide basis. The bank's quarterly LTD ratio during the evaluation period averaged 32.4 percent, with a quarterly average high of 38.2 percent and quarterly low of 26.9 percent. We compared the bank's LTD ratio to five similarly situated institutions in rural areas west of the Dallas-Fort Worth-Arlington, TX MSA with assets ranging from \$44.5 million to \$88.5 million. The quarterly average LTD ratio for banks in this peer group was 46.4 percent, with a high ratio of 62.3 percent and a low ratio of 13.4 percent. FNB Lipan's average LTD ratio is within the range of similar situated institutions, albeit somewhat lower than overall peer average. This performance is reasonable given the size and scope of banking operations. FNB Lipan is a \$26 million institution focusing on consumer lending within a rural market with limited credit demand. Notably, consumer lending comprised over 80 percent of total number of loans originated by count during the evaluation period. Consumer loans are generally smaller in dollar amount and contribute to a lower LTD ratio. Moreover, community contacts indicated that the town of Lipan, Texas and immediate surrounding areas did not have any unmet credit needs.

Lending in Assessment Area

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

The bank originated and purchased 76.7 percent of its total loans by number and 84.1 percent by dollar amount 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.

Lending Inside and Ou	tside of the	e Assessi	ment Area	L						
I. C.	Number of Loans				- 1	Dollar Amount of Loans \$(000s)				-
Loan Category	ban Category Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Consumer	33	76.7	10	23.3	43	503,848	84.1	95,115	15.9	598,963
Total	33	76.7	10	23.3	43	503,848	84.1	95,115	15.9	598,963

Description of Institution

First National Bank of Lipan (FNB Lipan) is an intrastate community bank headquartered in Lipan, Texas. The bank was originally established in 1913 and is independently owned and operated by the Branson Family. The bank is not a subsidiary of a holding company and has no affiliates or subsidiaries.

FNB Lipan provides traditional banking services to the general public from its one and only Lipan-based office, catering to local individuals, small businesses, and small farms. Bank lobby services are provided Monday through Friday from 8:00 am to 3:00 pm, with extended hours until 6:00 pm on Fridays. FNB Lipan also operates a drive through facility during normal banking hours. The bank does not operate any Automated Teller Machines (ATMs). Deposit products are also traditional and include products for individuals and businesses. FNB Lipan did not engage in any merger or acquisition activity during the evaluation period.

The bank's physical operations are located in the northwest corner of Hood County, Texas, which borders multiple rural counties and is approximately 50 miles southwest of Fort Worth. The bank has identified one assessment area (AA) consisting of six rural, contiguous census tracts (CT) surrounding its only office in Lipan, Hood County, Texas. Specifically, the AA includes two CTs in west Hood County; one CT in northeast Erath County; two CTs in east Palo Pinto County, and one CT in Parker County. Although the Parker County CT is in the Fort-Worth-Arlington-Grapevine MD, the inclusion of this one largely rural census tract did not substantially extend within the metropolitan boundary and was adjoined to the bank's non-MSA assessment area delineation. Some residents in this CT use local services and have Lipan mailing addresses. This AA delineation is appropriate and does not arbitrarily exclude low- or moderateincome areas. The AA consist only of whole census tracts.

Due to local demand, the bank primarily focuses on consumer lending. At the end of our evaluation period, the bank reported total assets of \$26.3 million, total deposits of \$24.3 million and Tier 1 Capital of \$2.1 million as of December 31, 2021. Loans and leases totaled approximately \$8 million or 30.3 percent of total assets. Outstanding loans by category include consumer loans at 37.4 percent, 1-4 family mortgage loans at 32.6 percent, agricultural/farmland loans at 15.6 percent, commercial loans at 12.1 percent, and construction loans at 2.3 percent of total loans. Held-to-maturity investment securities totaled approximately \$6 million, or 22.8 percent of total assets.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of the AA during the evaluation period. The prior CRA evaluation was dated January 28, 2019 and the bank received a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNB Lipan was evaluated under the Small Bank CRA evaluation procedures. As such, this Performance Evaluation (PE) assessed the bank's performance solely under the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the AA, including LMI borrowers, through its lending activities. The evaluation period for this examination is from January 1, 2019 to December 31, 2021. In evaluating the bank's lending performance, we identified loans to individuals as the bank's primary loan product. We analyzed a sample of 33 loans to individuals originated inside the AA during the evaluation period.

The bank was not required to report home loan data pursuant to the Home Mortgage Disclosure Act (HMDA) based on the following; 1) the bank's total assets were below the minimum asset threshold reporting requirements for HMDA; 2) the bank was not located in a metropolitan statistical area (MSA) as required by HMDA and 3) the bank did not originate the minimum number of home mortgages in any year during the evaluation period.

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 fullscope 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.

FNB Lipan has delineated one AA in Texas comprised of rural areas immediately surrounding the bank's Lipan-based office, as described in the "Description of Institution" section above. This AA delineation includes portions of Erath, Hood, Palo Pinto, and Parker Counties. In all, the AA consists of three middle income and three upper income CTs. The AA consists of whole CTs, does not arbitrarily exclude LMI CTs, and includes CTs where the bank's office is located and originated the majority of its loans. The AA does not reflect illegal discrimination.

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.

Ratings

The bank's overall rating is based solely on performance in the State of Texas. The state rating is based on performance in the bank's sole AA. FNB Lipan's primary loan product is loans to individuals. The distribution of loans by the income level of consumer borrowers was given sole weight. Analysis of geographic distribution was not completed because there are no low- or moderate-income CTs in the AA. Refer to the "Scope" section under the 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) 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 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 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 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 Texas

CRA rating for the State of Texas¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- FNB Lipan's LTD ratio is reasonable, reflecting responsiveness to credit needs in the community.
- FNB Lipan originated a majority of loans, both by number and dollar amount, inside the AA.
- FNB Lipan exhibits an excellent distribution of loans to individuals of different income levels.

Description of Institution's Operations in Texas

FNB Lipan is an intrastate bank that provides banking services to the public through its main office with a drive-up facility in Lipan, Texas. The bank has designated one AA that includes portions of surrounding rural areas in Erath, Hood, Palo Pinto, and Parker Counties, as discussed in the "Description of Institution" section above. The bank continues to offer traditional products and services common for community banks of its size and complexity, with an emphasis on consumer lending. In regard to local competition, there are five banks operating in the AA with FNB Lipan holding 6.5 percent of market share. FNB Lipan is ranked fourth in this AA with \$25.9 million in total deposit dollars. The First National Bank of Granbury and Spirit of Texas Bank, SSB have the dominate market share with 49.5 percent and 20.4 percent, respectively, of total deposits. Furthermore, these institutions also have the most extensive branch network in the area with 3 branches and 2 branches, respectively.

We met with a community contact within the local area to obtain a community profile and identify opportunities for community development. Local economic conditions are stable and exhibit a few positive trends relative to the small size of the community. Cattle operations and agriculture remain the dominate industry, which continues to benefit from increased beef demand from neighboring metropolitan areas. Major employers include the local phone company, government, and the school system. Also, the City of Lipan is experiencing some renovation to its downtown core, and a few new businesses have opened in recent years. Moreover, the community contact indicated that FNB Lipan is doing a good job at providing banking services to the local population and there were no unmet credit needs within the market.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Additional demographic information on the institution's AA is summarized in the table below:

Table A – Dem				essment Ar	ea	
Demographic Characteristics	Assessmen #	t Area: C Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	50.0	50.0	0.0
Population by Geography	31,935	0.0	0.0	55.7	44.3	0.0
Housing Units by Geography	15,055	0.0	0.0	55.3	44.7	0.0
Owner-Occupied Units by Geography	9,765	0.0	0.0	56.0	44.0	0.0
Occupied Rental Units by Geography	2,329	0.0	0.0	47.9	52.1	0.0
Vacant Units by Geography	2,961	0.0	0.0	58.7	41.3	0.
Businesses by Geography	2,690	0.0	0.0	57.1	42.9	0.0
Farms by Geography	247	0.0	0.0	55.1	44.9	0.0
Family Distribution by Income Level	8,675	15.8	20.4	17.7	46.0	0.0
Household Distribution by Income Level	12,094	20.7	17.1	17.5	44.6	0.0
Median Family Income MSA - 23104 Fort Worth-Arlington- Grapevine, TX		\$69,339	Median Hou	ising Value		\$133,24
Median Family Income Non- MSAs - TX		\$52,198	Median Gro	ss Rent		\$849
			Families Bel	low Poverty	v Level	7.0%

Texas Non-MSA AA

Scope of Evaluation in Texas

As discussed above, a full-scope review was performed on the bank's AA for the evaluation period covering January 1, 2019 to December 31, 2021. Refer to the table in appendix A "Scope of Examination" for a list of all AAs under review.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

There were no low- or moderate-income CTs in the AA. The AA consists of three middle-income and three upper-income census tracts, therefore an analysis of the geographic distribution of consumer loans would not be meaningful.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Consumer Loans

During the evaluation period, the distribution of loans to individuals is excellent. The percentage of consumer loans to low-income individuals exceeded the percentage of low-income households in the AA. The bank's consumer lending to moderate-income individuals also exceeded the percentage of moderate-income households in the AA.

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Responses to Complaints

FNB Lipan and the OCC did not receive any CRA related complaints during the evaluation period.

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:	01/01/2019 to 12/31/20	21
Bank Products Reviewed:	Consumer loans	
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State		
Texas		
NonMSA	Full scope	The nonMSA consists of six rural, contiguous census tracts surrounding the bank's only branch located in Lipan, TX including: 1 CT in northeast Erath County; 1 CT in Parker County; 2 CTs in west Hood County and 2 CTs in east Palo Pinto County.

Appendix B: Summary of MMSA and State Ratings

RATINGS FNB Lipan					
Overall Bank:	Lending Test Rating				
FNB Lipan	Satisfactory				
MMSA or State:					
Texas	Satisfactory				

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 more householder').

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.

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 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.

% Ban
ds Loans
)

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.