



COMMUNITY REINVESTMENT ACT
PUBLIC FILE

REVISED
March 2025

LOCATIONS

BRANCHES

OLD PARKLAND

Freedom Place at Old Parkland
4143 Maple Avenue, Suite 100
Dallas, TX 75219
972-698-5760

LOBBY HOURS Monday-Friday: 9am-4pm

SERVICES Full Service

LOCATION	COUNTY	CENSUS TRACT	INCOME LEVEL	MSA
	Dallas	0005.02	UPPER	Dallas-Plano-Irving, TX
	ESTABLISHED			
	11/1/2017			

TULSA

Southern Hills Tower
2431 East 61st Street; Suite 150
Tulsa, OK 74136
866-698-5760

LOBBY HOURS Monday-Friday: 10am-3pm

DRIVE-THRU Monday-Friday: 9am-5pm

SERVICES Full Service

LOCATION	COUNTY	CENSUS TRACT	INCOME LEVEL	MSA
	Tulsa	0087.00	UPPER	Tulsa, OK
	ESTABLISHED			
	4/1/2018			

BRANCHES OPENED OR CLOSED

FOLLOWING IS A RECAP OF FACILITIES CHANGES FOR THE CURRENT AND TWO PRIOR YEARS.

RELOCATIONS

None

LOCATIONS OPENED

None

LOCATIONS CLOSED

None

SERVICES AND FEES

PERSONAL

CHECKING

- *MapleMark Checking*
- *Gold Checking*
- *Platinum Checking*

SAVINGS

- *MapleMark Savings*
- *Gold Money Market Savings*
- *Platinum Money Market Savings*
- *Certificates of Deposit*

LOANS

Personal lending products to meet a variety of consumer needs; including –

- *Personal Lines of Credit*
- *Mortgages*
- *Home Equity Loans*
- *Home Equity Lines of Credit*
- *Automobile Loans*
- *Aircraft Loans*
- *Boat Loans*

SERVICES

- *Online Banking*
- *Mobile Banking and Deposits*
- *Telephone Banking*
- *Wire Transfers*
- *External Transfers*
- *Bill Payment*
- *Debit Cards*
- *Commercial Credit Cards*
- *Money Orders*
- *Cashier's Checks*
- *Treasury Management Solutions*
 - *ACH Origination*
 - *Online Wire Origination*
 - *Remote Deposit Capture*
 - *Sweeps*
 - *Positive Pay*

BUSINESS

CHECKING

- *Business Checking*
- *Commercial Analysis Checking*

SAVINGS

- *MapleMark Savings*
- *Gold Money Market Savings*
- *Platinum Money Market Savings*
- *Certificates of Deposit*

LOANS

Wide variety of commercial credit facilities available to meet the needs of a diverse and complex business community; including –

- *Revolving Lines of Credit*
- *Term Commercial and Industrial Loans*
- *Equipment and Machinery Financing*
- *Aviation Financing*
- *Owner-Occupied Real Estate*
- *Letters of Credit*
- *Interim Construction Loans*
- *Term Real Estate Loans*
- *USDA Loans*
- *Small Business Loans and Lines of Credit*

FEES

- *See attached Fee Schedule.*



RATE AND FEE SCHEDULE

For Personal and Business Accounts

DATE LAST UPDATE
 RATES February 14, 2025
 FEES February 4, 2025

TREASURY AND COMMERCIAL ANALYSIS CUSTOMERS, PLEASE SEE YOUR MAPLEMARK BANKER FOR PRICING

RATE SHEET AND SERVICE CHARGE SCHEDULE

	MINIMUM BALANCE TO OPEN	MINIMUM BALANCE ² TO OBTAIN APY	ANNUAL PERCENTAGE YIELD (APY)	INTEREST RATE	MONTHLY SERVICE CHARGE	MINIMUM BALANCE ³ TO AVOID SERVICE CHARGE
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PERSONAL ACCOUNTS

CHECKING

CHECKING	\$200	NON INTEREST-BEARING				
GOLD CHECKING	\$5,000	\$.01 AND GREATER	0.05 %	0.05%		
PLATINUM CHECKING	\$25,000	\$25,000 - \$49,999.99 \$50,000 AND GREATER	0.05 % 0.05 %	0.05% 0.05%		

SAVINGS AND MONEY MARKET

SAVINGS	\$100	\$.01 AND GREATER	0.10%	0.10%		
PLATINUM MONEY MARKET	\$25,000	\$.01 - \$249,999.99 \$250,000 AND GREATER	1.50% 1.50%	1.49% 1.49%		

BUSINESS ACCOUNTS

CHECKING

BUSINESS CHECKING	\$500	NON INTEREST-BEARING			\$10	\$500
COMMERCIAL ANALYSIS	\$0	EARNINGS CREDIT			\$30	N/A

SAVINGS AND MONEY MARKET

SAVINGS	\$100	\$.01 AND GREATER	0.10%	0.10%		
GOLD MONEY MARKET	\$10,000	\$.01 AND GREATER	1.50%	1.49%		

TRADITIONAL CERTIFICATES OF DEPOSIT (CDs)

	IN BRANCH MINIMUM BALANCE TO OPEN MINIMUM BALANCE TO OBTAIN APY	IN BRANCH \$25,000 \$25,000 AND GREATER	ONLINE ¹ \$25,000 \$25,000 AND GREATER			
	ANNUAL PERCENTAGE YIELD (APY)	INTEREST RATE	ANNUAL PERCENTAGE YIELD (APY)	INTEREST RATE	ANNUAL PERCENTAGE YIELD (APY)	INTEREST RATE
90 DAYS	0.15%	0.15%	3.00%	2.96%	-	-
6 MONTHS	0.15%	0.15%	4.00%	3.93%	-	-
9 MONTHS	0.15%	0.15%	4.10%	4.02%	-	-
12 MONTHS	0.15%	0.15%	4.15%	4.07%	4.15%	4.07%
18 MONTHS	0.15%	0.15%	3.90%	3.83%	3.90%	3.83%
24 MONTHS	0.15%	0.15%	3.90%	3.83%	3.90%	3.83%
36 MONTHS	0.15%	0.15%	2.50%	2.47%	-	-

¹ The average daily balance is calculated by adding the principal in the account for each day of the period and dividing that figure by the number of days in the period.

² Daily balance (the amount of principal in the account each day). Interest is compounded and credited monthly.

³ Available for consumers only. Accounts may not be opened in the name of a business, trust or other legal entity or by a fiduciary (e.g., executor, conservator, guardians, trustees, etc.).

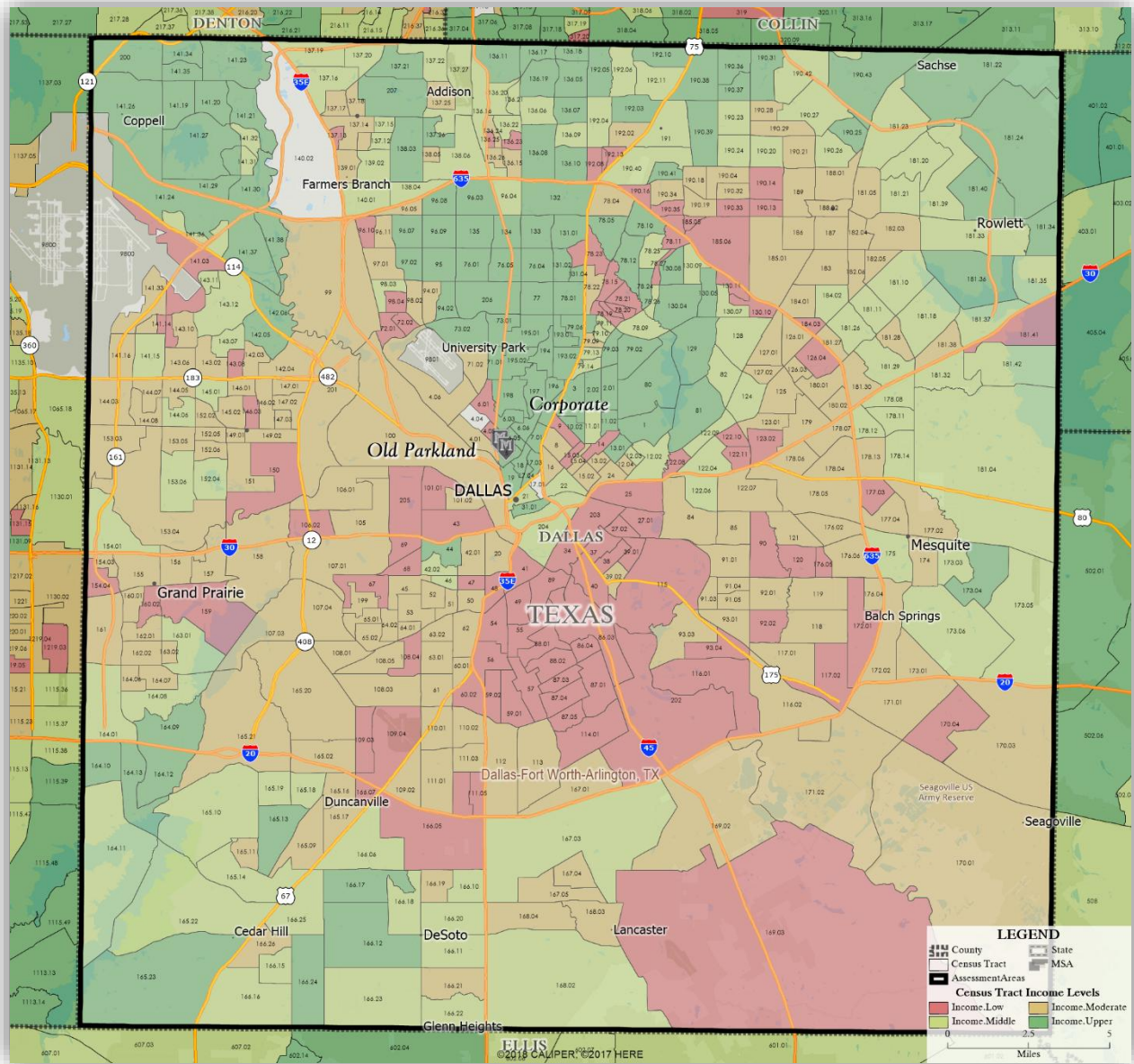
FEE SCHEDULE

ACCOUNT CLOSURE WITHIN 60 DAYS OF OPENING		INSUFFICIENT FUNDS		PER ITEM
CHECKING OR SAVINGS	\$ 10	OVERDRAFT FEE		\$ 35
GOLD CHECKING OR MONEY MARKET	\$ 25	<i>The categories of transactions for which an overdraft fee may be imposed are those by any of the following: check, in-person withdrawal, ATM withdrawal, or other electronic means.</i>		
PLATINUM CHECKING OR MONEY MARKET	\$ 75	DEPOSIT ITEM RETURN [CHARGEBACK] FEE		\$ 8
ATM AND CARD FEES		BUSINESS CHECKING ACCOUNT FEES		PER TRANSACTION
ATM FOREIGN INQUIRY OR TRANSACTION	COMPLIMENTARY	BUSINESS CHECKING PER ITEM FEE		\$.35
ACCOUNT SPECIAL HANDLING		WIRE TRANSFERS		COMPLIMENTARY
ACCOUNT DOCUMENTATION REVISIONS - PER REQUEST	\$ 50	INCOMING		
ACCOUNT RESEARCH - PER HOUR (1 HOUR MINIMUM)	\$ 35	OUTGOING - DOMESTIC	ONLINE \$ 15 MANUAL \$ 20	
ACCOUNT RESEARCH - PER ITEM	\$ 1	OUTGOING - INTERNATIONAL	ONLINE \$ 35 MANUAL \$ 45	
COLLECTION AGENCY FEE - PER ITEM	\$ 25	OUTGOING - INTERNATIONAL (FX)		\$ 50
COLLECTION ITEM - DOMESTIC - IN OR OUT, PER ITEM	\$ 15	STOP PAYMENT FEE		\$ 25
COLLECTION ITEM - INTERNATIONAL ACTUAL COST; MINIMUM	\$ 65	DEBIT CARD REPLACEMENT OR RE-PIN		\$ 7.50
LEGAL PROCESS FEE [GARNISHMENT, LEVY OR EQUIVALENT] - PER ITEM	\$ 100	CASHIER'S CHECKS OR MONEY ORDERS		\$ 3

ASSESSMENT AREA MAPS

DALLAS | DALLAS COUNTY

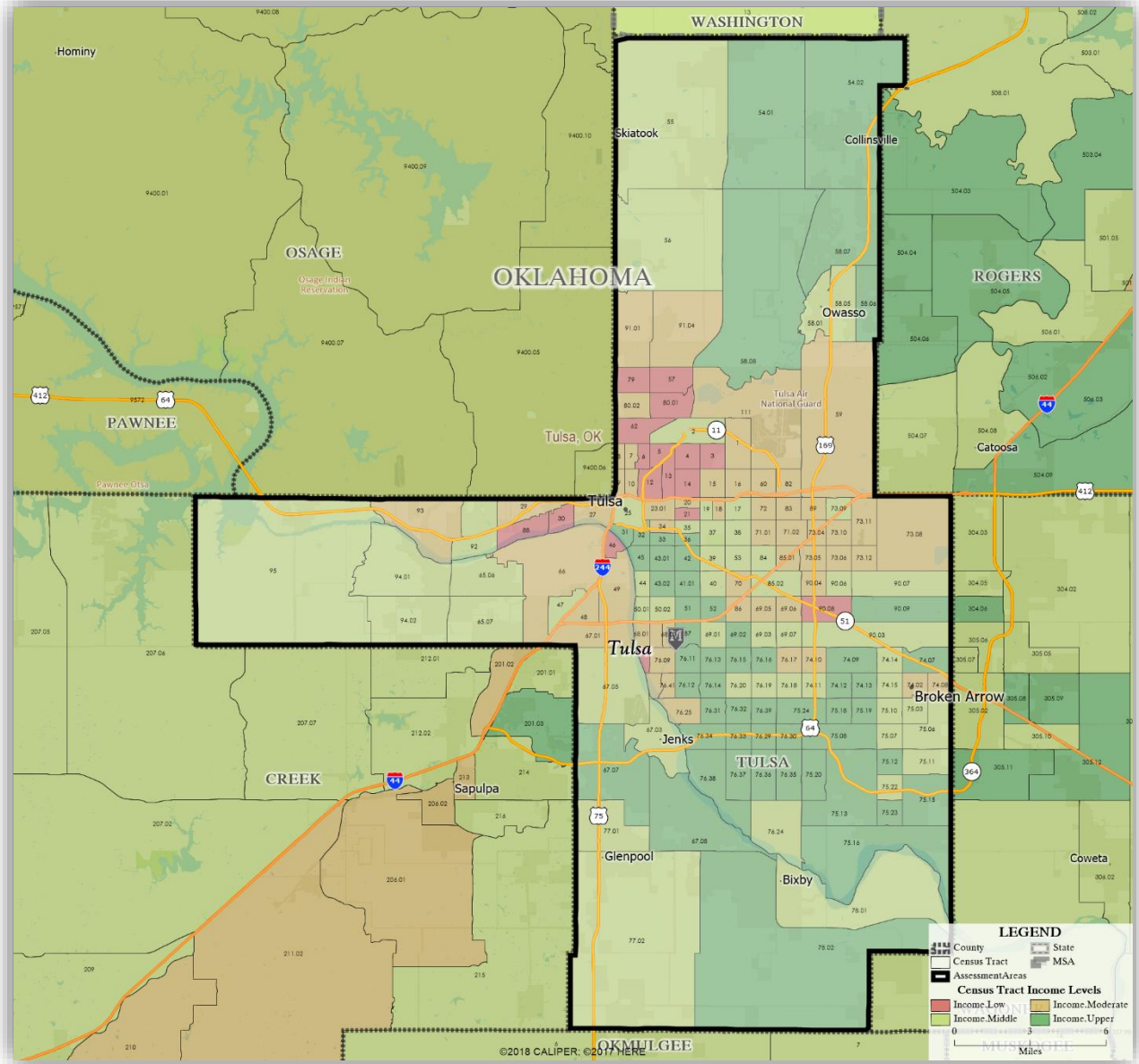
The Dallas market Assessment Area is comprised of the totality of Dallas County, Texas.



ASSESSMENT AREA MAPS

TULSA | TULSA COUNTY

The Tulsa market Assessment Area is comprised of the totality of Tulsa County, Oklahoma.



LOAN TO DEPOSIT RATIO

	2024			
	Q1	Q2	Q3	Q4
LOANS	\$909,698	\$861,815	\$842,806	\$810,519
DEPOSITS	\$986,321	\$929,886	\$927,051	\$854,648
LTD	92%	93%	91%	95%

HOME MORTGAGE DISCLOSURE ACT

THE BANK'S HOME MORTGAGE DISCLOSURE ACT DISCLOSURE STATEMENT MAY BE OBTAINED ON THE CONSUMER FINANCIAL PROTECTION BUREAU'S WEBSITE AT:

WWW.CONSUMERFINANCE.GOV/HMDA

WRITTEN CRA COMPLAINTS OR RESPONSES

THE BANK HAS NOT RECEIVED ANY WRITTEN CRA COMPLAINTS IN THE CURRENT OR PRIOR TWO CALENDAR YEARS.

CRA PERFORMANCE EVALUATION

THE BANK'S MOST RECENT CRA EVALUATION WAS COMPLETED IN JULY 2024. THE PUBLIC DISCLOSURE RESULTING FROM THE EXAMINATION IS ATTACHED.

PUBLIC DISCLOSURE

July 8, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MapleMark Bank
Certificate Number: 3182

4143 Maple Avenue
Dallas, Texas 75219

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

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	2
DESCRIPTION OF ASSESSMENT AREAS.....	3
SCOPE OF EVALUATION.....	3
CONCLUSIONS ON PERFORMANCE CRITERIA.....	5
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
STATE OF OKLAHOMA – Full-Scope Review.....	11
DESCRIPTION OF INSTITUTION’S OPERATIONS IN STATE OF OKLAHOMA.....	11
SCOPE OF EVALUATION – STATE OF OKLAHOMA.....	13
CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF OKLAHOMA	14
STATE OF TEXAS – Full-Scope Review	16
DESCRIPTION OF INSTITUTION’S OPERATIONS IN STATE OF TEXAS	16
SCOPE OF EVALUATION – STATE OF TEXAS	19
CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF TEXAS.....	19
APPENDICES	22
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA.....	22
SUMMARY OF RATINGS FOR RATED AREAS	23
GLOSSARY	24

INSTITUTION RATING

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

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

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is more than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending related activities are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among businesses of different sizes.
- The institution did not receive any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Maple Financial Holdings, Inc., located in Dallas, Texas, wholly owns MapleMark Bank (MapleMark), also headquartered in Dallas, Texas. The bank does not have any other affiliates or subsidiaries relevant to this evaluation. The bank received a Needs to Improve rating based on Intermediate Small Bank Examination Procedures at its previous November 21, 2022, CRA Performance Evaluation conducted by the FDIC.

MapleMark maintains two full-service locations, including one in Dallas, Texas, and one in Tulsa, Oklahoma. The bank has not opened or closed any offices since the previous evaluation. Further, the bank has not participated in any merger or acquisition activity during the same time frame.

MapleMark's primary business focus is commercial lending, while also offering traditional banking products and services. In addition to commercial lending products, the institution offers consumer and 1-4 family residential loan products. The bank also offers a variety of deposit services, including non-interest and interest-bearing checking accounts, savings and money market accounts, and certificates of deposit. Alternative systems for delivery of banking services include telephone, online, and mobile banking. MapleMark does not maintain any proprietary automated teller machines (ATMs).

According to the March 31, 2024, Report of Income and Condition, MapleMark reported total assets of \$1.2 billion, total loans of \$922.3 million, and total deposits of \$986.3 million. Since the prior evaluation, total assets increased 5.3 percent, total loans increased 2.4 percent, and total deposits increased 12.5 percent.

The following table illustrates the outstanding loan portfolio as of March 31, 2024, reflecting a distribution supportive of the institution's commercial focus, with commercial loans (secured by nonfarm nonresidential properties and commercial and industrial) representing 66.5 percent of total loans.

Loan Portfolio Distribution as of 03/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	75,302	8.1
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	201,758	21.9
Secured by Multifamily (5 or more) Residential Properties	22,673	2.4
Secured by Nonfarm Nonresidential Properties	338,504	36.7
Total Real Estate Loans	638,237	69.1
Commercial and Industrial Loans	274,481	29.8
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	8,638	0.9
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	3,872	0.4
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(1,969)	(0.2)
Total Loans	923,259	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that limit the institution's ability to meet the credit needs of its assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its performance will be evaluated. MapleMark designated two assessment areas in its two rated areas which include the States of Oklahoma and Texas. The first rated area, the State of Oklahoma, is made up of Tulsa County, which is located in the Tulsa, Oklahoma Metropolitan Statistical Area (Tulsa MSA). The second rated area, the State of Texas, is made up of Dallas County, which is located in the Dallas-Plano-Irving, Texas Metropolitan Division (Dallas MD). There have been no changes to the number of rated areas or assessment areas since the last evaluation.

The combined areas include a total of 853 census tracts that reflect the following income designations based on 2020 U.S. Census data: 120 low-, 289 moderate-, 213 middle-, 219 upper-income census tracts, and 12 census tracts without income designations. There has been an increase in the total number of census tracts from the 704 noted at the prior evaluation when the 2015 American Community Survey (ACS) designated: 124 low-, 241 moderate-, 161 middle-, 173 upper-income census tracts, and 5 census tracts without income designations. Refer to the rated area sections of this evaluation for a detailed description of those areas. The bank's assessment areas conform to regulatory requirements.

SCOPE OF EVALUATION

General Information

This evaluation covers the time period from the previous evaluation dated November 21, 2022, to the current evaluation dated July 8, 2024. To assess performance, examiners applied the Federal

Financial Institutions Examination Council (FFIEC) Intermediate Small Bank Examination Procedures, which includes the Lending Test and Community Development Test. The Appendix lists each tests' criteria.

As noted, the bank operates in two rated areas, the States of Oklahoma and Texas. Consequently, examiners utilized full-scope procedures on both areas in accordance with outstanding guidance. The following table shows the State of Texas generated a clear majority of the bank's loans, generally consistent with the majorities of deposits gathered, while offices remain even. Consequently, examiners weighed performance in the State of Texas heavier than the State of Oklahoma when arriving at applicable overall conclusions and ratings, which remains consistent with the weight placed at the prior evaluation.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Tulsa MSA	10,969	25.0	160,862	16.3	1	50.0
Dallas MD	32,884	75.0	825,190	83.7	1	50.0
Total	43,853	100.0	986,052	100.0	2	100.0

Source: Bank Data; FDIC Summary of Deposits (6/30/2023)

Activities Reviewed

For the Lending Test, Intermediate Small Bank Examination Procedures require examiners to determine the bank's major product lines from which to review. As an initial matter, examiners may select from the same loan categories used for CRA Large Bank evaluations: home mortgage, small business, small farm, and consumer. The following table shows the bank's 2023 lending activity by loan category, which reflects a generally consistent pattern with the bank's lending emphasis since last evaluation.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	80,280	21.3	9	4.6
Secured by Farmland	0	0.0	0	0.0
Secured by 1-4 Family Residential Properties	23,656	6.3	27	13.8
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	42,658	11.3	14	7.1
Commercial and Industrial Loans	227,122	60.2	132	67.3
Agricultural Loans	0	0.0	0	0.0
Consumer Loans	3,472	0.9	14	7.1
Other Loans	0	0.0	0	0.0
Total Loans	377,188	100.0	196	100.0

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Utilizing the bank's loan trial, examiners determined the bank's major loan product is commercial at 74.4 percent by number and 71.5 percent by dollar volume. Home mortgage only represents 6.3 percent by dollar volume and 13.8 percent by number. The bank began reporting Home Mortgage Disclosure Act (HMDA) data for calendar year 2023. Prior to 2023, the bank was not a HMDA reporter. Per outstanding guidance, for collected data the most recent full calendar year with aggregate data is to be presented. Currently, the most recent aggregate data is for 2022 and since the bank was not a HMDA reporter in 2022 this information will not be presented. Since the other categories typically reviewed for CRA do not represent major product lines and thus would not materially affect any conclusions or ratings, this evaluation does not include a review of them.

For the Lending Test, this evaluation includes a review of all 88 small business loans totaling \$35.1 million that were originated or purchased in 2023, which represents the most recent completed calendar year of available data. D&B data for 2023 provided the standard of comparison for small business loans.

For the Community Development Test, examiners considered all community development activities since the prior evaluation dated November 21, 2022. This test further encompasses all prior period investments, those purchased prior to this evaluation's date, but that remain outstanding. Examiners use the book value as of the current evaluation date for all prior period investments.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

MapleMark demonstrated satisfactory performance regarding the Lending Test. This performance is primarily supported by a majority of loans originated inside the assessment areas and reasonable records regarding geographic distribution and borrower profile. The overall conclusions demonstrated consistent performance in each rated area. The more than reasonable loan-to-deposit ratio did not result in an improvement to the overall rating. The bank did not receive any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

The LTD ratio is more than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs. The bank's LTD ratio, calculated from Report of Condition and Income data, averaged 96.9 percent over the past six quarters. The bank's quarterly net LTD ratios ranged from a low of 92.2 on March 31, 2024, to a high of 105.1 on December 31, 2022, with an overall decreasing trend.

The table below shows performance for the bank and four comparable institutions reflecting generally similar emphases and asset sizes. As shown, the bank's average net LTD ratio exceeds all of the similarly situated institutions.

LTD Ratio Comparison		
Bank	Total Assets as of 03/31/2024 (\$000s)	Average Net LTD Ratio (%)
MapleMark Bank (Dallas, TX)	1,168,000	96.9
First Oklahoma (Jenks, OK)	1,072,000	92.9
North Dallas Bank & Trust Company (Dallas, TX)	1,833,000	73.5
Pegasus Bank (Dallas, TX)	1,254,000	71.4
Texas Security Bank (Dallas, TX)	1,177,000	91.3
<i>Source: Reports of Condition and Income 12/31/2022 – 3/31/2024</i>		

Assessment Area Concentration

A majority of loans and other lending related activities are in the institution’s assessment areas.

The following table shows the bank originated a majority of its small business loans, by number, inside its assessment areas. While a majority of loans originated outside the assessment area by dollar amount.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	57	64.8	31	35.2	88	17,033	48.5	18,096	51.5	35,129
<i>Source: 2023 Bank Data</i>										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas for the institution as a whole. Performance is inconsistent between the two rated areas. Reasonable performance regarding small business loans in the State of Texas outweighs poor performance in the State of Oklahoma to support this conclusion. Examiners considered the loan product type reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Each rated area includes a more detailed discussion of the bank’s geographic distribution performance.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among business of different sizes for the institution as a whole. Consistent performance regarding small business loans in both rated areas support this conclusion. Examiners considered the loan product type reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Each rated area includes a more detailed discussion of the bank’s borrower profile performance.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

The conclusion regarding the institution's overall performance is consistent with the Community Development Test conclusions for each rated area.

Community Development Loans

MapleMark originated four community development loans totaling approximately \$24.5 million during the evaluation period. This level of activity represents 2.1 percent of average total assets of \$1.2 billion and 2.6 percent of average net loans of \$939.1 million since the previous evaluation. These levels reflect a decrease from the 4.8 percent of average total assets and 6.3 percent average net loans reported at the previous evaluation.

A majority of the dollar volume of the bank's community development lending benefited revitalize and stabilize efforts in the bank's assessment areas, demonstrating responsiveness to an identified community development need for both rated areas. The following tables illustrate the bank's community development lending activity by rated area, purpose, and year.

Community Development Lending by Assessment Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oklahoma	0	0	0	0	1	1,200	0	0	1	1,200
Texas	0	0	0	0	1	8,000	2	15,258	3	23,258
Total	0	0	0	0	2	9,200	2	15,258	4	24,458

Source: Bank Data

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022*	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	1	1,200	2	15,258	3	16,458
2024 YTD	0	0	0	0	1	8,000	0	0	1	8,000
Total	0	0	0	0	2	9,200	2	15,258	4	24,458

Source: Bank Data; *Since prior evaluation

Qualified Investments

MapleMark made use of 17 qualified investments totaling approximately \$9.1 million during the evaluation period, including 9 donations totaling approximately \$73 thousand. The total volume of qualified investments equates to 0.8 percent of average total assets and 8.2 percent of average total securities of \$110.8 million. This reflects a decrease from the 1.2 percent of average total assets and 11.1 percent of average securities reported at the previous evaluation.

A majority of the dollar volume of the bank’s qualified investments benefited affordable housing efforts in the bank’s assessment areas, demonstrating responsiveness to an identified community development need for both rated areas. The following tables illustrate the bank’s qualified investments by rated area, purpose, and year.

Qualified Investments by Assessment Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Oklahoma	1	1,005	5	740	1	500	0	0	7	2,245
Texas	1	1,570	5	59	2	2,250	0	0	8	3,879
Nationwide Activities	2	2,963	0	0	0	0	0	0	2	2,963
Total	4	5,538	10	799	3	2,750	0	0	17	9,087

Source: Bank Data

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	4	5,538	1	726	3	2,750	0	0	8	9,014
2022*	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0
2024 YTD	0	0	0	0	0	0	0	0	0	0
Subtotal	4	5,538	1	726	3	2,750	0	0	8	9,014
Qualified Grants & Donations	0	0	9	73	0	0	0	0	9	73
Total	4	5,538	10	799	3	2,750	0	0	17	9,087

Source: Bank Data; *Since prior evaluation

The following point highlights an example of a qualified investment benefitting the broader nationwide area.

- **Affordable Housing** – The bank retained approximately \$3.0 million in mortgage-backed securities with the underlying loans to finance single-family housing for low- and moderate-income individuals.

Community Development Services

The bank provided 55 community development services since the previous evaluation. This level reflects a notable increase over the 15 community development services at the prior evaluation. The services involve bank personnel’s use of their technical expertise to benefit organizations or projects with a primary purpose of community development, as defined by the CRA regulation. The following tables show services benefited community service organizations that provide services to low- and moderate-income individuals, which demonstrates responsiveness to an identified community development need for both rated areas. The following tables detail the bank’s community development services by rated area, purpose, and year.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Oklahoma	0	21	0	0	21
Texas	0	34	0	0	34
Total	0	55	0	0	55

Source: Bank Data

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022*	0	0	0	0	0
2023	0	44	0	0	44
2024 YTD	0	11	0	0	11
Total	0	55	0	0	55

*Source: Bank Data; *Since Prior Evaluation*

As shown in the following table, the bank operates two branches with one branch located in a low-income geography. The bank does not operate any branches in moderate-income geographies.

The following table details the geographic distribution of the branches and ATMs in relation to the assessment area demographics.

Branch and ATM Distribution by Geography Income Level								
Tract Income Level	Census Tracts		Population		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	120	14.1	497,967	15.2	1	50.0	0	0.0
Moderate	289	33.9	1,152,173	35.1	0	0.0	0	0.0
Middle	213	25.0	839,863	25.6	0	0.0	0	0.0
Upper	219	25.6	763,306	23.2	1	50.0	0	0.0
NA	12	1.4	29,509	0.9	0	0.0	0	0.0
Total	853	100.0	3,282,818	100.0	2	100.0	0	0.0

Source: 2020 U.S. Census; Bank Data

While the bank does not have ATMs, the bank does not charge a fee for foreign ATM transactions, although the owner of the ATMs may charge a fee. The bank provides alternative delivery systems that help avail the bank’s services to low- and moderate-income individuals. MapleMark offers 24-hour telephone banking services, internet, text, and mobile banking services including mobile deposits, bill pay, and internal/external fund transfer capabilities. The bank offers all of these alternative delivery system services free of charge to all bank customers.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

STATE OF OKLAHOMA – Full-Scope Review

CRA RATING FOR STATE OF OKLAHOMA: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF OKLAHOMA

MapleMark designated one assessment area in the State of Oklahoma: the Tulsa MSA assessment area. The bank did not make any changes to this assessment area since the prior evaluation. The assessment area conforms to CRA regulatory requirements.

The Tulsa MSA assessment area consists of all 208 census tracts that make up Tulsa County, one of seven counties located in the Tulsa MSA. The bank operates one full-service office in this area and does not operate any ATMs. The bank did not open or close any full-service offices in this area since the prior evaluation. The office maintains hours consistent with the area and the industry. The bank's delivery systems and range of products and services remain consistent with those reflected at the institution level.

Economic and Demographic Data

The assessment area's census tracts reflect the following income designations based on 2020 U.S. Census data: 13 low-, 66 moderate-, 53 middle-, 75 upper-income census tracts, and 1 census tract without an income designation. The following table provides additional demographic and economic data for the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Tulsa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	208	6.3	31.7	25.5	36.1	0.5
Population by Geography	669,279	6.1	30.7	26.0	36.8	0.5
Housing Units by Geography	284,341	6.9	31.5	27.3	34.0	0.4
Owner-Occupied Units by Geography	151,162	3.6	23.2	27.7	45.4	0.1
Occupied Rental Units by Geography	102,747	11.0	40.6	27.0	20.6	0.8
Vacant Units by Geography	30,432	9.3	41.6	25.9	22.2	0.9
Businesses by Geography	115,870	4.1	24.3	28.6	42.8	0.1
Farms by Geography	2,901	3.7	22.1	35.0	39.0	0.2
Family Distribution by Income Level	159,053	21.5	17.3	18.9	42.4	0.0
Household Distribution by Income Level	253,909	24.0	16.5	17.4	42.1	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$72,203	Median Housing Value			\$164,872
			Median Gross Rent			\$897
			Families Below Poverty Level			10.9%

Source: 2020 U.S. Census Data and 2023 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

D&B Business Demographic data shows that 115,870 total non-farm businesses are in the Tulsa MSA assessment area. The analysis of small business loans under the borrower profile criterion compares the distribution of businesses by gross annual revenue level. Approximately 91.1 percent of all non-farm businesses reported gross annual revenues of \$1 million or less, 2.9 percent reported gross annual revenues of more than \$1 million, and 6.0 percent reported no gross annual revenue information.

The services industry continues to maintain the largest portion of businesses at 33.4 percent, followed by non-classifiable establishments at 27.2 percent, and the finance, insurance, and real estate sector at 11.6 percent. Approximately 60.7 percent of businesses report having 1 to 4 employees, 33.4 percent report 5 to 9 employees, 5.0 percent report more than 10 employees, and 0.9 percent did not report employee sizes.

According to Moody's Analytics, the area's largest employers include: Saint Francis Health System, Hillcrest Healthcare System, American Airlines Maintenance Base, and Ascension St. John.

The following table shows the unemployment rates for Tulsa County in comparison to state and national averages reported for the prior three full calendar years. As illustrated, the unemployment rate in Tulsa County reflected similar levels to that of the State of Oklahoma and maintained slightly lower rates than the national average.

Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Tulsa County	4.2	3.1	3.2
State of Oklahoma	4.0	3.0	3.2
National Average	5.4	3.6	3.6
<i>Source: Bureau of Labor Statistics</i>			

Competition

This area contains a moderate level of competition from other chartered banks based on the area’s population, with 197 branch offices representing 49 institutions serving about 5,154 people, on average. According to FDIC Deposit Market Share data as of June 30, 2023, MapleMark ranks 32nd with 0.6 percent of the area’s deposit market. The largest 10 institutions by deposit market share encompassed 103 branches and captured approximately 71.4 percent of all deposit market share.

Credit and Community Development Needs and Opportunities

Considering information obtained from bank management, as well demographic and economic data, examiners determined that the area’s primary credit need is small business lending.

Regarding the area’s community development needs, demographic data shows over one-third, or 38.8 percent of the area’s families reported low- and moderate-income and 10.9 percent reported incomes below the poverty level. These levels suggest a need for activities that benefit organizations or projects that provide community services to these families. Additionally, the demographic data showing 38.0 percent of the assessment area’s census tracts receiving low- and moderate-income designations suggests a community development need for activities that revitalize or stabilize such geographies. Further, a need exists to expand affordable housing stock in low- and moderate-income geographies and to low- and moderate-income individuals.

SCOPE OF EVALUATION – STATE OF OKLAHOMA

For the State of Oklahoma, examiners performed a full-scope review of the Tulsa MSA assessment area. Examiners considered the same review period and lending products discussed at the institution level. Consequently, examiners considered small business loans in the Tulsa MSA assessment area.

Regarding the Community Development Test, the scope for this rated area remains consistent with that of the institution as a whole. Refer to the institution level Scope of Evaluation section for additional information.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF OKLAHOMA

LENDING TEST

MapleMark demonstrated reasonable Lending Test performance in the State of Oklahoma. Reasonable performance regarding borrower profile outweighed poor performance regarding geographic distribution to support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects poor dispersion throughout the Tulsa MSA assessment area. Poor performance regarding small business lending supports this conclusion. Examiners considered the loan product type reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the Tulsa MSA assessment area. The following table shows that the bank did not originate any loans to small businesses in low-income census tracts, reflecting poor performance. For moderate-income census tracts, the bank’s lending falls below demographics by 8.5 percentage points, also reflecting poor performance.

Geographic Distribution of Small Business Loans					
Assessment Area: Tulsa MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	4.1	0	0.0	0	0.0
Moderate	24.3	3	15.8	272	5.2
Middle	28.6	7	36.8	2,872	54.7
Upper	42.8	9	47.4	2,107	40.1
Not Available	0.1	0	0.0	0	0.0
Totals	100.0	19	100.0	5,251	100.0

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

Borrower Profile

The distribution of borrowers reflects, given the demographics of the Tulsa MSA assessment area, reasonable penetration among businesses of different sizes. Reasonable performance regarding small business loans supports this conclusion. Examiners considered the loan product type reviewed relative to the available comparable data and any performance context issues when arriving at this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. The following table shows the bank originated 74.0 percent or more than seven out of ten small

business loans to businesses with gross annual revenues of \$1 million or less, evidencing reasonable performance.

Detailed Distribution of Small Business Loans by Gross Annual Revenues Assessment Area: Tulsa MSA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	69.4	5	26.3	109	2.1
\$100,000 - \$249,999	16.0	3	15.8	715	13.6
\$250,000 - \$499,999	3.7	2	10.5	200	3.8
\$500,000 - \$1,000,000	1.9	4	21.1	1,875	35.7
Subtotal <= \$1,000,000	91.1	14	74.0	2,899	55.0
>\$1,000,000	2.9	4	21.1	2,350	44.8
Revenue Not Available	6.0	1	5.3	2	0.0
Total	100.0	19	100.0	5,251	100.0

Source: 2023 D&B Data, Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

COMMUNITY DEVELOPMENT TEST

MapleMark demonstrates adequate responsiveness to community development needs in the State of Oklahoma area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development.

Community Development Loans

As noted at the institution level, the bank originated one community loan totaling \$1.2 million in the Tulsa MSA assessment area. This level reflects an increase over no community development loans in this assessment area at the prior evaluation. The current dollar amount equates to 4.9 percent of the bank’s total community development loans. As noted, this rated area contributed 25.0 percent of the bank’s total dollar volume of loans.

The following point highlights an example of a community development loan in the Tulsa MSA assessment area.

- **Economic Development** – The bank renewed a \$1.2 million loan to a company that meets the size and purpose eligibility standards and supports permanent job creation and retention for low- and moderate-income individuals.

Qualified Investments

The bank made use of seven qualified investments totaling \$2.2 million in the Tulsa MSA assessment area as noted at the institution level. This reflects a decrease from the 10 qualified investments totaling \$3.1 million in this assessment area at the prior evaluation. The current dollar amount equates to 24.7 percent of the bank’s total qualified investments compared to this rated area containing 16.3 percent of the bank’s total deposits.

The following point highlights an example of a qualified investment in the Tulsa MSA assessment area.

- **Community Services** – The bank made an investment for approximately \$726 thousand in a school bond to construct and renovate facilities where a majority of the students qualify for free or reduced lunch. Thus, the activity primarily benefits low- or moderate-income individuals.

Community Development Services

As noted at the institution level, the bank provided 21 community development services in the Tulsa MSA assessment area. This figure reflects an increase from no community development services at the prior evaluation. The current level represents 38.2 percent of the bank’s total community development services. Comparatively, the State of Oklahoma contains 50.0 percent of the bank’s total branches.

The following point highlights an example of a community development service in the Tulsa MSA assessment area.

- **Community Service** – Bank employees taught several financial literacy classes to students where the majority qualify for free or reduced lunch. Thus, the activity primarily benefits low- or moderate-income individuals.

The alternative delivery systems in the State of Oklahoma remain consistent with that discussed at the institution level.

STATE OF TEXAS – Full-Scope Review

CRA RATING FOR STATE OF TEXAS: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN STATE OF TEXAS

MapleMark designated one assessment area in the State of Texas: the Dallas MD assessment area. The bank did not make any changes to this assessment area since the prior evaluation. The assessment area conforms to CRA regulatory requirements.

The Dallas MD assessment area consists of all 645 census tracts that make up Dallas County, one of seven counties located in the Dallas MD. The bank operates one full-service office in this area and does not operate any ATMs. The bank did not open or close any full-service offices in this area since the prior evaluation. The office maintains hours consistent with the area and the industry. The bank’s delivery systems and range of products and services remain consistent with those reflected at the institution level.

Economic and Demographic Data

The assessment area’s census tracts reflect the following income designations based on 2020 U.S. Census data: 107 low-, 223 moderate-, 160 middle-, 144 upper-income census tracts, and 11 census tracts without an income designation. The following table provides additional demographic and economic data for the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: Dallas County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	645	16.6	34.6	24.8	22.3	1.7
Population by Geography	2,613,539	17.5	36.2	25.5	19.8	1.0
Housing Units by Geography	1,027,813	17.7	33.4	25.7	21.9	1.2
Owner-Occupied Units by Geography	476,375	10.5	32.6	29.1	27.4	0.4
Occupied Rental Units by Geography	469,621	24.4	34.5	22.8	16.3	2.0
Vacant Units by Geography	81,817	22.1	31.8	21.7	22.4	2.0
Businesses by Geography	500,270	8.6	22.5	29.1	38.7	1.1
Farms by Geography	6,413	7.5	23.0	27.7	40.8	1.0
Family Distribution by Income Level	607,453	30.4	20.1	18.5	31.1	0.0
Household Distribution by Income Level	945,996	28.5	19.5	18.1	33.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$88,315	Median Housing Value			\$234,735
			Median Gross Rent			\$1,197
			Families Below Poverty Level			11.4%

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

D&B Business Demographic data shows that 500,270 total non-farm businesses are in the Dallas MD assessment area. The analysis of small business loans under the borrower profile criterion compares the distribution of businesses by gross annual revenue level. Approximately 91.5 percent of all non-farm businesses reported gross annual revenues of \$1 million or less, 2.8 percent reported gross annual revenues of more than \$1 million, and 5.8 percent reported no gross annual revenue information.

The services industry continues to maintain the largest portion of businesses at 32.7 percent, followed by non-classifiable establishments at 29.2 percent, and the finance, insurance, and real estate sector at 13.3 percent. Approximately 59.3 percent of businesses report having 1 to 4 employees, 34.6 percent report 5 to 9 employees, 5.0 percent report more than 10 employees, and 1.1 percent did not report employee sizes.

According to Moody’s Analytics, the area’s largest employers include: Walmart Inc., UT Southwestern Medical Center, Baylor Scott & White Health, and Lockheed Martin.

The following table shows the unemployment rates for Dallas County in comparison to state and national averages reported for the prior three full calendar years. As illustrated, the unemployment rate in Dallas County reflected slightly lower rates than the State of Texas and national averages.

Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Dallas County	5.0	3.5	3.7
State of Texas	5.6	3.9	4.0
National Average	5.4	3.6	3.6

Source: Bureau of Labor Statistics

Competition

This area contains a high level of competition from other chartered banks based on the area’s population, with 574 branch offices representing 113 institutions serving about 554 people, on average. According to FDIC Deposit Market Share data as of June 30, 2023, MapleMark ranks 30th with 0.3 percent of the area’s deposit market. The largest 10 institutions by deposit market share encompassed 271 branches and captured approximately 84.08 percent of all deposit market share.

Community Contact

As part of the evaluation process examiners obtain information from third parties knowledgeable of the assessment area to assist in identifying needs of the area. This information helps determine financial institutions’ responsiveness to these needs and shows available credit and community development opportunities. Examiners utilized a recent community contact interview with a community member representing a Community Development Financial Institution knowledgeable of the area’s local economic, demographic, and housing environment to help assess the area’s current economic conditions, community credit needs, and potential opportunities for bank involvement.

The contact noted there is a shortage of affordable homes and businesses are still recovering from the COVID-19 pandemic. The organization has a loan product and down-payment assistance program for home buyers; however, there are not enough affordable homes within the area to fully utilize this product. Investors are purchasing a majority of the affordable homes resulting in increases to home prices and taxes. Wages in the area are still low and a majority of individuals do not make a living wage. Due to the decline of service industry jobs during the pandemic, individuals are turning to the organization for workforce development. Businesses in the area still have not fully recovered from the COVID-19 pandemic as supplier costs have continued to increase and it is hard for smaller businesses to catch up. Restaurant businesses were hit the hardest in the area. The contact stated that small organizations such as theirs, are in need of bank investments and to provide lending capital in order to deploy their consumer loan program on a larger effort. The contact noted that the differing amount of lending products within the area and the Special Purpose Programs have helped to provide good and useful options to the people served in the area.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact, bank management, as well demographic and economic data, examiners determined that the area's primary credit need is small business lending.

Regarding the area's community development needs, demographic data shows over one-half, or 50.5 percent of the area's families reported low- and moderate-income and 11.4 percent reported incomes below the poverty level. These levels suggest a need for activities that benefit organizations or projects that provide community services to these families. Additionally, the demographic data showing 51.2 percent of the assessment area's census tracts receiving low- and moderate-income designations suggests a community development need for activities that revitalize or stabilize such geographies. Further, a need exists to expand affordable housing stock in low- and moderate-income geographies and to low- and moderate-income individuals.

SCOPE OF EVALUATION – STATE OF TEXAS

For the State of Texas, examiners performed a full-scope review of the Dallas MD assessment area. Examiners considered the same review period and lending products discussed at the institution level. Consequently, examiners considered small business loans in the Dallas MD assessment area.

Regarding the Community Development Test, the scope for this rated area remains consistent with that of the institution as a whole. Refer to the institution level Scope of Evaluation section for additional information.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXAS

LENDING TEST

MapleMark demonstrated reasonable Lending Test performance in the State of Texas. Reasonable performance regarding geographic distribution and borrower profile supports this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Dallas MD assessment. Reasonable performance regarding small business lending supports this conclusion. Examiners considered the loan product type reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the Dallas MD assessment area. The following table shows that the bank's level of lending in the low-income census tracts falls below demographics by 3.3 percentage points, reflecting reasonable performance. For moderate-income census tracts, the bank's lending exceeds demographics by 6.4 percentage points, also reflecting reasonable performance.

Geographic Distribution of Small Business Loans					
Assessment Area: Dallas MD					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	8.6	2	5.3	44	0.4
Moderate	22.5	11	28.9	197	1.7
Middle	29.1	11	28.9	4,347	36.9
Upper	38.7	14	36.8	7,194	61.1
Not Available	1.1	0	0.0	0	0.0
Totals	100.0	38	100.0	11,782	100.0

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

Borrower Profile

The distribution of borrowers reflects, given the demographics of the Dallas MD assessment area, reasonable penetration among businesses of different sizes. Reasonable performance regarding small business loans supports this conclusion. Examiners considered the loan product type reviewed relative to the available comparable data and any performance context issues when arriving at this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. The following table shows the bank originated 66.0 percent or more than six out of ten small business loans to businesses with gross annual revenues of \$1 million or less, evidencing reasonable performance.

Detailed Distribution of Small Business Loans by Gross Annual Revenues					
Assessment Area: Dallas MD					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	70.0	8	21.1	559	4.7
\$100,000 - \$249,999	16.1	5	13.2	1,072	9.1
\$250,000 - \$499,999	3.5	8	21.1	367	3.1
\$500,000 - \$1,000,000	1.8	4	10.5	473	4.0
Subtotal <= \$1,000,000	91.5	25	66.0	2,471	21.0
>\$1,000,000	2.8	10	26.3	7,061	59.9
Revenue Not Available	5.8	3	7.9	2,250	19.1
Total	100.0	38	100.0	11,782	100.0

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

COMMUNITY DEVELOPMENT TEST

MapleMark demonstrates adequate responsiveness to community development needs in the State of Texas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development.

Community Development Loans

As noted at the institution level, the bank originated three community loans totaling \$23.3 million in the Dallas MD assessment area. These levels reflect a decrease over the five community development loans totaling \$40.6 million in this assessment area at the prior evaluation. The current dollar amount equates to 95.1 percent of the bank's total community development loans. As noted, this rated area contributed 75.0 percent of the bank's total dollar volume of loans.

The following point highlights an example of a community development loan in the Dallas MD assessment area.

- ***Revitalize or Stabilize*** – The bank originated a loan for approximately \$4.3 million to revitalize a warehouse in a moderate-income census tract. Thus, the activity revitalizes and stabilizes a qualifying geography by helping to attract new or retain existing businesses or residents.

Qualified Investments

The bank made use of eight qualified investments totaling \$3.9 million in the Dallas MD assessment area as noted at the institution level. This reflects a decrease from the 22 qualified investments totaling \$7.1 million in this assessment area at the prior evaluation. The current dollar amount equates to 42.7 percent of the bank's total qualified investments compared to this rated area containing 83.7 percent of the bank's total deposits.

The following point highlights an example of a qualified investment in the Dallas MD assessment area.

- ***Affordable Housing*** – The bank made one investment totaling approximately \$1.6 million to finance multi-family housing for low- and moderate-income individuals.

Community Development Services

As noted at the institution level, the bank provided 34 community development services in the Dallas MD assessment area. This figure reflects an increase from 15 community development services indicated at the prior evaluation. The current level represents 61.8 percent of the bank's total community development services. Comparatively, the State of Texas contains 50.0 percent of the bank's total branches.

The following point highlights an example of a community development service in the Dallas MD assessment area.

- ***Community Service*** – Bank employees assisted new homeowners with budget preparation in conjunction with Habitat for Humanity to aid residents in homeownership.

The alternative delivery systems in the State of Texas remain consistent with that discussed at the institution level.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

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

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

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
OKLAHOMA	SATISFACTORY	SATISFACTORY	SATISFACTORY
TEXAS	SATISFACTORY	SATISFACTORY	SATISFACTORY

GLOSSARY

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

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

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

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

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

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

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

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

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

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

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

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

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

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

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

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

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

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