



## Community Reinvestment Act Policy

Revised: January 2026

- I. **Purpose:** The Community Reinvestment Act of 1977 (“CRA”) and the federal banking regulators’ CRA Regulations were enacted to help ensure that banks meet the credit needs of their communities. The Regulations provide guidance with regard to the methods regulators will use in assessing the Bank’s CRA performance. Each bank must delineate one or more “assessment areas” within which the regulators will evaluate the Bank’s record of helping to meet the credit needs of its community. Each bank must also make available to the public certain CRA related information. CRA encourages lenders to establish dialogues with local community members regarding their credit needs and to make efforts, within sound credit practices, to help meet those needs. The Board of Directors recognizes its responsibility to establish and implement policies and procedures to achieve compliance with the requirements of the CRA and to serve the community’s credit needs, including the needs of low and moderate income areas.
- II. **Statement:** The Board of Directors and senior management of FirstOak Bank will take an active role in assuring overall compliance with the CRA. The Board of Directors of the Bank will review and approve the Bank’s CRA policy, including the reasonableness of the delineated assessment area, at least annually and after each material change. All CRA-related discussions are to be documented in minutes of the Board of Director’s meetings. Further, the Board of Directors will review periodic self-assessments of the Bank’s CRA compliance efforts. The Bank will make reasonable efforts to ascertain the credit needs of the community and to develop and market products and services to meet those needs. All of the Bank’s directors, officers and employees are encouraged to be familiar with the Bank’s CRA goals and responsibilities. It is the Bank’s policy to comply with the standards imposed by CRA and related regulations by making safe and sound loans and investments and providing safe and sound services on which the Bank expects to make a profit. The Bank will develop and apply flexible underwriting standards for loans that benefit low or moderate income geographies or individuals which are consistent with safe and sound banking practices. The implementing regulations to the Community Reinvestment Act of 1977 (“CRA”) were revised for small banks effective January 1, 2016 to include banks with assets under \$304 million. Small banks operating under this definition are to be evaluated under the small bank lending test. Under the small bank lending test, small banks are to be assessed by their loan-to-deposit ratio (including community development loans and qualified investments), their percentage of loans in their assessment area, their record of lending to

different income levels and businesses and farms of different sizes, the geographic distribution of their loans, and their record of taking action in response to written complaints about their performance in helping to meet credit needs in their assessment area. This bank will be prepared to be evaluated under the small bank lending test and does not elect to be assessed under the lending, investment, and services tests, does not elect to be assessed under the community development test, and has not adopted an approved CRA strategic plan.

- III. **CRA Compliance Officer:** Christi Kuehn-Culver is designated as CRA Compliance Officer, the person responsible for coordinating, documenting, and monitoring the Bank's CRA program. Shanda Chambers will serve as the backup CRA Officer. The Bank's Board of Directors recognizes that CRA regulations are subject to change and that certain CRA regulations may or may not be effective to the Bank, or may become effective to the Bank on different dates, depending on certain factors and alternative forms of CRA compliance which are available to the Bank under applicable regulations. The Board of Directors, with the guidance and assistance of the Compliance Officer, intends to ensure that the Bank complies with such regulations in a proper and timely manner. The CRA Compliance Officer's responsibilities will include reporting periodically, but not less than annually, to the Board of Directors concerning the Bank's CRA efforts, performance, and, if appropriate, areas for improvement.
- IV. **Assessment Areas:** The Bank's designated assessment areas is available in the attached Exhibit "A". Proposed Nashville Assessment Area which includes Williamson County in its entirety was added in preparation for the Nashville branch opening late 2026. Williamson County is one of 13 counties within the Nashville-Davidson-Murfreesboro Franklin MSA.
- V. **CRA Notice:** The Bank will provide in the lobby of its main office and each of its branches a public CRA Notice which conforms in form and substance with the applicable regulatory requirements as set forth in the attached Exhibit "B".
- VI. **CRA Public File:** The Bank will maintain a public file, in which it will assemble all information and documents required by then effective regulations applicable to the Bank. Upon request, the Bank will provide copies of the information in its public file to any persons requesting such information in its public file to any persons requesting such information. Such information will be provided in paper or other form acceptable to the person making the request. If the Bank charges fees for such service, the fees will be reasonable and will not exceed copying and mailing costs (if applicable). The information contained in the Bank's public file will be made available at the Bank's main office. The Bank will make available at each of its branches:
- a. A copy of the public section of its most recent CRA performance evaluation and a list of services provided by the branch; and
  - b. Within five calendar days of a request, all the information in the public file relating to the assessment area in which the branch is located.
- The Bank will update its public file in order to ensure that the information contained therein will be current as of April 1 of each year.

**VII. Data Collection, Reporting, and Disclosure:** The Bank will assemble, collect and maintain such CRA related information as may be required by applicable regulations in form and substance which are fully compliant with such regulations.

Exhibit "A"

**Southeast Kansas Assessment Areas**

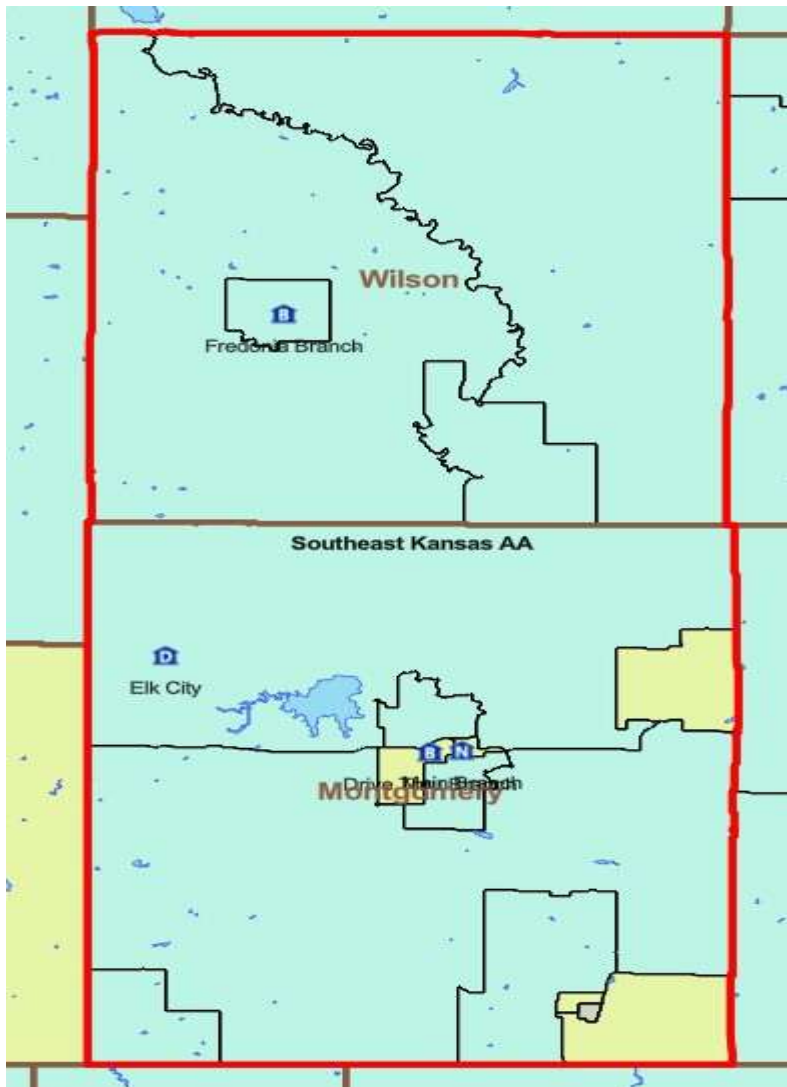
The Southeast Kansas Assessment Areas includes Montgomery and Wilson Counties in their entirety. Following is a listing of 2025 census tracts within each county:

**Montgomery County**

9501.00	9502.00	9503.00	9504.00	9505.00	9506.00
9507.00	9508.00	9510.00	9511.00	9513.00	9514.00

**Wilson County**

0971.00	0972.00	0973.00	0974.00		
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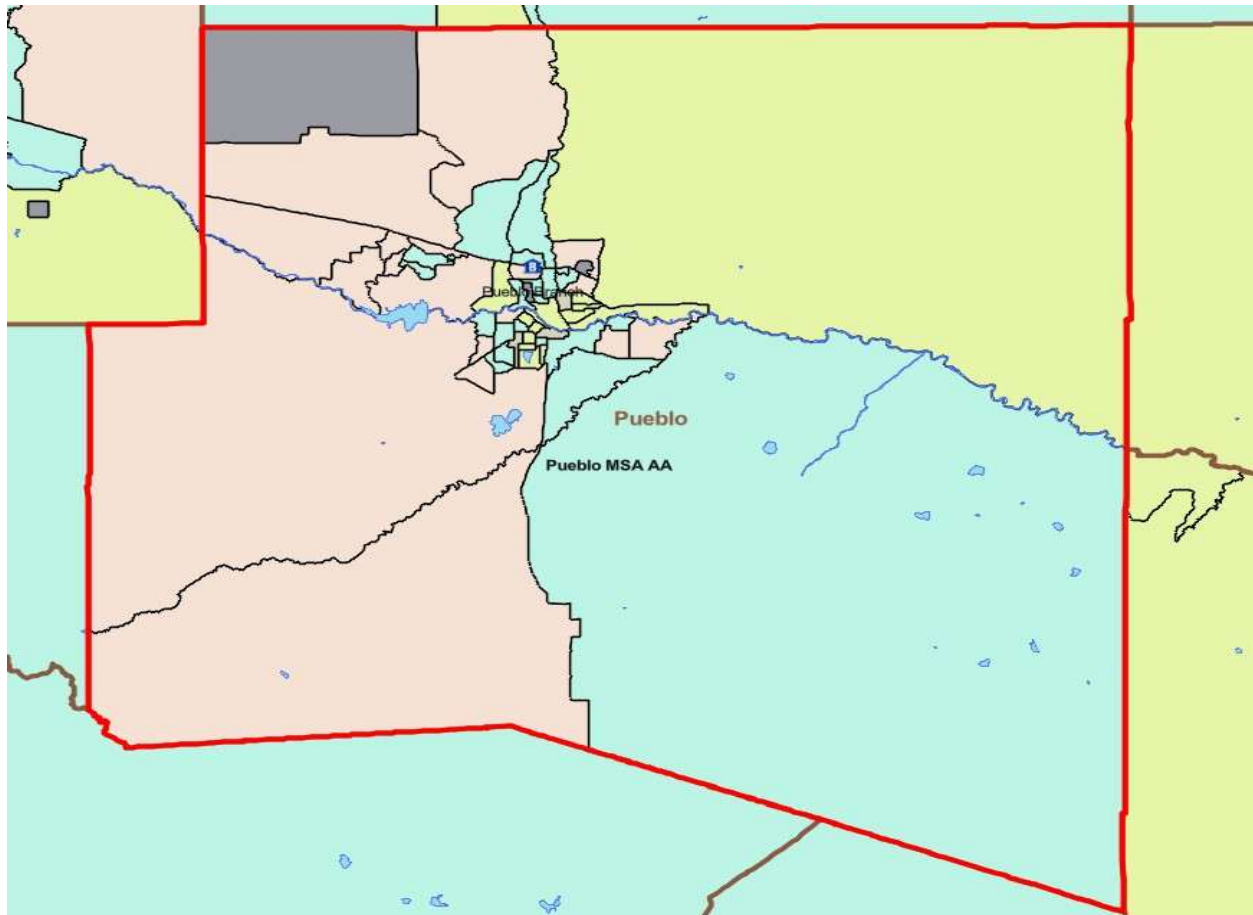


## Pueblo MSA Assessment Area

The Pueblo MSA Assessment Area includes the entire Pueblo County. Following is a listing of 2025 census tracts within Pueblo County:

### Pueblo County

0001.00	0002.00	0003.00	0004.00	0005.00	0006.00
0008.00	0009.02	0009.03	0009.04	0009.05	0010.00
0011.00	0012.00	0014.00	0015.00	0016.00	0017.00
0018.00	0019.00	0020.00	0021.00	0022.00	0023.00
0024.00	0025.00	0026.00	0027.00	0028.01	0028.02
0028.04	0028.06	0028.07	0028.08	0029.01	0029.06
0029.11	0029.12	0029.13	0029.14	0029.15	0029.16
0029.17	0029.19	0029.20	0029.21	0029.22	0029.23
0030.01	0030.04	0031.03	0031.04	0031.05	0031.06
0032.00	0035.00	0036.00	9801.00		

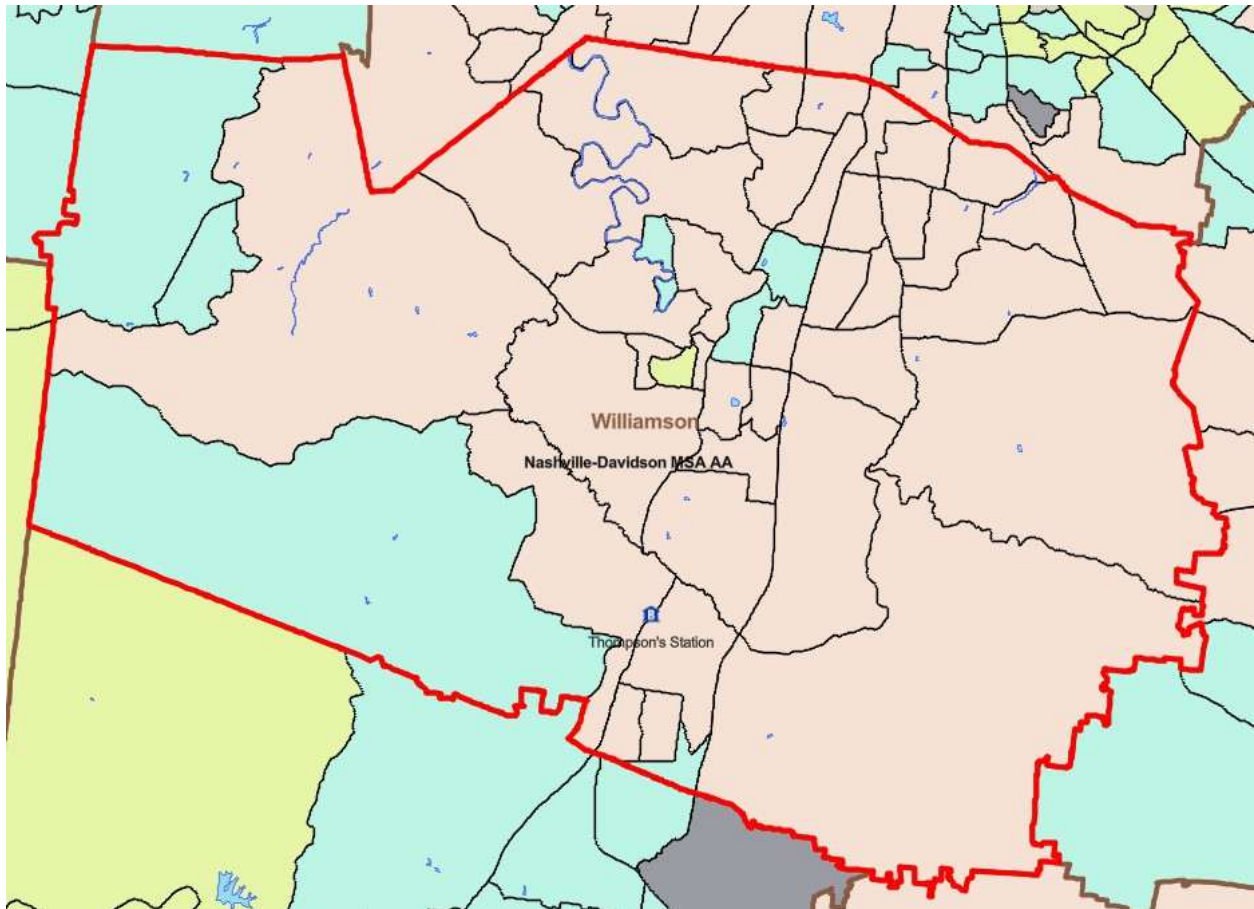


## Proposed Nashville Assessment Area

The proposed Nashville Assessment Area includes Williamson County in its entirety. Williamson County is one of 13 counties within the Nashville-Davidson-Murfreesboro Franklin MSA. Following is a list of the 2025 census tracts in Williamson County.

### Williamson County

0501.02	0501.03	0501.04	0501.05	0502.04	0502.05
0502.06	0502.07	0502.09	0502.10	0502.11	0502.12
0503.03	0503.04	0503.05	0503.06	0503.07	0504.03
0504.04	0504.05	0504.06	0505.02	0505.03	0505.04
0506.01	0506.03	0506.04	0507.01	0507.02	0508.01
0508.02	0509.04	0509.05	0509.06	0509.07	0509.08
0509.09	0512.06	0512.07	0512.08		



## Exhibit “B”

### COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA performance evaluation, prepared by the Federal Reserve Bank of Kansas City (Reserve Bank); and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198. You may send written comments about our performance in helping to meet community credit needs to President Brad Oakes, 113 North Penn, PO Box 868, Independence, KS 67301 and Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of FNB Bancshares, Inc., a bank holding company. You may request from Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198 an announcement of applications covered by the CRA filed by bank holding companies.

